

INDICTMENT
SUPREME COURT OF THE STATE OF NEW YORK
BRONX COUNTY

PEOPLE OF THE STATE OF NEW YORK

INDICTMENT #:

AGAINST

GRAND JURY #:
43236/2017

JOHN DOE, A.K.A. SAUL, A.K.A. ALEX
CARLOS RODRIGUEZ SANTANA
CHARLIE RODRIGUEZ
ROBERT GOLDBERG
RAFAEL RODRIGUEZ
JOSE JAQUEZ
SANTIAGO JOSE MARTINEZ SANCHEZ, A.K.A.
EDUITO
SILVIA VIDAL
ROBERTO GONZALEZ FRANCO
MARIO ALBERTO URBINA GARCIA, A.K.A.
MONSTRO
OSCAR ALESSANDRO GARCIA, A.K.A. JUNIOR

COUNTS:

P.L. 220.77(1)	Operating as a Major Trafficker	(1 Count)
P.L. 220.77(3)	Operating as a Major Trafficker	(3 Counts)
P.L. 220.77(2)	Operating as a Major Trafficker	(1 Count)
P.L. 220.43(1)	Criminal Sale of a Controlled Substance in the First Degree	(7 Counts)
P.L. 220.21(1)	Criminal Possession of a Controlled Substance in the First Degree	(7 Counts)
P.L. 220.41(1)	Criminal Sale of a Controlled Substance in the Second Degree	(4 Counts)
P.L. 220.18(1)	Criminal Possession of a Controlled Substance in the Second Degree	(6 Counts)
P.L. 105.15	Conspiracy in the Second Degree	(1 Count)
P.L. 220.39(1)	Criminal Sale of a Controlled Substance in the Third Degree	(76 Counts)
P.L. 220.16(1)	Criminal Possession of a Controlled Substance in the Third Degree	(117 Counts)
P.L. 220.16(12)	Criminal Possession of a Controlled Substance in the Third Degree	(4 Counts)
P.L. 220.09(1)	Criminal Possession of a Controlled Substance in the Fourth Degree	(7 Counts)
P.L. 105.10(1)	Conspiracy in the Fourth Degree	(2 Counts)

S Panel, 3rd Term

Date: 05/22/2019

A TRUE BILL

FOREPERSON

DARCEL D. CLARK
DISTRICT ATTORNEY

APPENDIX

JOHN DOE, A.K.A. SAUL, A.K.A. ALEX

COUNT 1 - 105.15
COUNT 3 - 105.10(1)
COUNT 7 - 220.77(3)
COUNT 8 - 220.77(2)
COUNT 176 - 220.39(1)
COUNT 177 - 220.16(1)
COUNT 179 - 220.43(1)
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COUNT 182 - 220.16(1)
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CARLOS RODRIGUEZ SANTANA

COUNT 1 - 105.15
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CHARLIE RODRIGUEZ

COUNT 1 - 105.15
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ROBERT GOLDBERG

COUNT 2 - 105.10(1)
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RAFAEL RODRIGUEZ

COUNT 2 - 105.10(1)
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JOSE JAQUEZ

COUNT 2 - 105.10(1)
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**SANTIAGO JOSE
MARTINEZ SANCHEZ,
A.K.A. EDUITO**

COUNT 2 - 105.10(1)
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SILVIA VIDAL

COUNT 2 - 105.10(1)
COUNT 3 - 105.10(1)

**ROBERTO GONZALEZ
FRANCO**

COUNT 3 - 105.10(1)
COUNT 4 - 220.77(1)
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COUNT 203 - 220.16(1)
COUNT 208 - 220.43(1)
COUNT 209 - 220.39(1)

MARIO ALBERTO
URBINA GARCIA, A.K.A.
MONSTRO

COUNT 3 - 105.10(1)

OSCAR ALESSANDRO
GARCIA, A.K.A. JUNIOR

COUNT 3 - 105.10(1)
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COUNT: 1

THE DEFENDANT(S) **JOHN DOE, A.K.A. SAUL, A.K.A. ALEX, CARLOS RODRIGUEZ SANTANA, AND CHARLIE RODRIGUEZ**, ACTING IN CONCERT WITH EACH OTHER, ROBERTO GONZALEZ FRANCO, MARIO ALBERTO URBINA GARCIA, OSCAR ALESSANDRO GARCIA, AND OTHERS BOTH KNOWN AND UNKNOWN TO THE GRAND JURY, COMMITTED THE CRIME OF CONSPIRACY IN THE SECOND DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 105.15, COMMITTED AS FOLLOWS:

The Defendant(s) **John Doe, a.k.a. Saul, a.k.a. Alex, Carlos Rodriguez Santana, and Charlie Rodriguez**, acting in concert with Each Other, Roberto Gonzalez Franco, Mario Alberto Urbina Garcia, Oscar Alessandro Garcia, and Others Both Known and Unknown to the Grand Jury, **on or about and between September 15, 2018 and February 8, 2019**, in Bronx County, New York, Chicago, Illinois, and elsewhere, intending that conduct constituting a class A felony be performed, that felony being Criminal Possession of a Controlled Substance in the First Degree, agreed with one or more persons to engage in or cause the performance of such conduct.

PREAMBLE

It was the purpose of this conspiracy to possess, transport, sell, and distribute narcotics in various locations throughout the United States, including Bronx County, and Philadelphia, Pennsylvania.

It was a part of this conspiracy that Roberto Gonzalez Franco and Mario Alberto Urbina Garcia obtained narcotics for distribution.

It was part of this conspiracy that narcotics be transported from Illinois to the Northeastern United States using motor vehicles with hidden compartments.

It was part of this conspiracy that members of the conspiracy follow the motor vehicle containing the narcotics with another additional motor vehicle.

It was a part of this conspiracy that Roberto Gonzalez Franco, Mario Alberto Urbina Garcia, and Oscar Alessandro Garcia would supply narcotics to **John Doe, a.k.a. Saul, a.k.a. Alex** in Bronx County.

It was a part of this conspiracy that **John Doe, a.k.a. Saul, a.k.a. Alex** would supply narcotics to **Carlos Rodriguez Santana** and **Charlie Rodriguez**.

It was a part of this conspiracy that **Carlos Rodriguez Santana** and **Charlie Rodriguez** would distribute narcotics in Bronx County and elsewhere.

It was also part of this conspiracy for its members to communicate with each other and others over cellular telephones using coded, guarded, and cryptic language.

OVERT ACTS

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

- 1) On or about September 15, 2018, Roberto Gonzalez Franco, Oscar Alessandro Garcia, and Mario Alberto Urbina Garcia, met inside of a Panera Bread located in Bronx County, and discussed the transport and distribution of narcotics into Bronx County and other locations in the Northeastern United States.
- 2) On or about October 26, 2018, **Carlos Rodriguez Santana** and **Charlie Rodriguez** engaged in a conversation, during which **Carlos Rodriguez Santana** stated, "There are thirty-seven bundles," and **Charlie Rodriguez** responded, "I'm going to call him...in fact I'm going to wait because he's only getting twenty-three, he said to take them over there and said if-if he doesn't like it he is going to come over here."
- 3) On or about October 29, 2018, Roberto Gonzalez Franco, Mario Alberto Urbina Garcia, **John Doe, a.k.a. Saul, a.k.a. Alex** and other individuals both known and unknown to the Grand Jury, met inside a restaurant located at 240 West 231st Street, in Bronx County, and discussed the distribution of narcotics in Bronx County and other locations in the Northeastern United States.
- 4) On or about November 4, 2018, **John Doe, a.k.a., Saul, a.k.a. Alex** and **Carlos Rodriguez Santana**, engaged in a conversation, during which **Carlos Rodriguez Santana** stated, "Try it, and give me samples of those to see if people like it."
- 5) On or about November 6, 2018, **John Doe, a.k.a., Saul, a.k.a. Alex** and **Carlos Rodriguez Santana**, engaged in a conversation, during which **John Doe, a.k.a., Saul, a.k.a. Alex** stated, "They are preparing something for me right here."
- 6) On or about November 6, 2018, **Carlos Rodriguez Santana** and **Charlie Rodriguez** engaged in a conversation, during which **Carlos Rodriguez Santana** stated, "Look...later, I'm going to call you later, to give you a

sample that they're bringing me" and **Charlie** responded, "Okay. I'll pass right now then..."

- 7) On or about February 3, 2019, **John Doe, a.k.a., Saul, a.k.a. Alex** and **Carlos Rodriguez Santana**, engaged in a conversation, during which **John Doe, a.k.a., Saul, a.k.a. Alex** asked, "Carlos, five hundred or how much" and **Carlos Rodriguez Santana** responded, "Whatever you can. What you can," and **John Doe, a.k.a., Saul, a.k.a. Alex** stated, "Look, they are coming to bring it to me now."
- 8) On or about February 3, 2019, **John Doe, a.k.a., Saul, a.k.a. Alex** and Oscar Alessandro Garcia, engaged in a conversation, during which Oscar Alessandro Garcia stated, "I'm around here on fifty-six," and **John Doe, a.k.a., Saul, a.k.a. Alex** responded, "Alright then, come over here."
- 9) On or about February 6, 2019, Mario Alberto Urbina Garcia rented a red Dodge Charger (Pennsylvania registration KLJ1398) from a car rental company in Philadelphia, Pennsylvania.
- 10) On or about February 7, 2019, Roberto Gonzalez Franco, Oscar Alessandro Garcia, and Mario Alberto Urbina Garcia, and other individuals both known and unknown to the Grand Jury, met at the Cicero Hotel, located at 4501 South Cicero Avenue in Chicago, Illinois.
- 11) On or about February 8, 2019, Oscar Alessandro Garcia and Mario Alberto Urbina Garcia placed fentanyl into a Chevrolet Traverse in the parking lot of the Cicero Hotel.
- 12) On or about February 8, 2019, at approximately 5:12 a.m., Mario Alberto Urbina Garcia departed the Cicero Hotel parking lot inside of a Chevrolet Traverse.
- 13) On or about February 8, 2019, at approximately 5:12 a.m., Roberto Gonzalez Franco and Oscar Alessandro Garcia were in the red Dodge Charger (Pennsylvania registration KLJ1398) as Oscar Alessandro Garcia drove it out of the parking lot of the Cicero Hotel.
- 14) Roberto Gonzalez Franco discussed the transportation of narcotics from Chicago, Illinois to the Northeastern United States.

COUNT: 2

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA, CHARLIE RODRIGUEZ, ROBERT GOLDBERG, RAFAEL RODRIGUEZ, JOSE JAQUEZ, SANTIAGO JOSE MARTINEZ SANCHEZ, AND SILVIA VIDAL,** ACTING IN CONCERT WITH EACH OTHER AND OTHERS BOTH KNOWN AND UNKNOWN TO THE GRAND JURY, COMMITTED THE CRIME OF CONSPIRACY IN THE FOURTH DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 105.10(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana, Charlie Rodriguez, Robert Goldberg, Rafael Rodriguez, Jose Jaquez, Santiago Jose Martinez Sanchez,** and **Silvia Vidal,** acting in concert with Each Other and Others Both Known and Unknown to the Grand Jury, **on or about and between October 17, 2017 and May 22, 2019,** in Bronx County and elsewhere, intending that conduct constituting a class B or class C felony be performed, those felonies being Criminal Sale of a Controlled Substance in the Third Degree and Criminal Possession of a Controlled Substance in the Third Degree, agreed with one or more persons to engage in or cause the performance of such conduct.

PREAMBLE

It was the purpose of this conspiracy to possess, transport, sell, and distribute narcotics in various locations, including Bronx County, and other locations New York State.

It was part of this conspiracy that **Jose Jaquez** and **Santiago Jose Martinez Sanchez** supplied narcotics to **Carlos Rodriguez Santana** and **Charlie Rodriguez.**

It was part of this conspiracy that **Carlos Rodriguez Santana** worked with **Charlie Rodriguez** to prepare narcotics and distribute narcotics to individuals both known and unknown.

It was part of this conspiracy that **Charlie Rodriguez** provided narcotics to **Robert Goldberg** and **Rafael Rodriguez.**

It was part of this conspiracy that **Charlie Rodriguez** and **Silvia Vidal** prepared narcotics for distribution.

It was also part of this conspiracy for its members to communicate with each other and others over cellular telephones using coded, guarded, and cryptic language.

OVERT ACTS

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

- 1) On or about February 17, 2018, **Charlie Rodriguez** and **Rafael Rodriguez** engaged in a conversation, during which **Rafael Rodriguez** stated, “Alright and yo, man. The same number, fourteen. And if you got one or two loose ones, that’d be cool.”
- 2) On or about February 21, 2018, **Charlie Rodriguez** and **Rafael Rodriguez** engaged in a conversation, during which **Rafael Rodriguez** asked, “You know what I’m talking about” and **Rafael Rodriguez** later stated, “The dog food,” and “Two packages” to which **Charlie Rodriguez** responded, “Alright.”
- 3) On or about May 2, 2018, **Carlos Rodriguez Santana** and **Jose Jaquez** engaged in a conversation, during which **Carlos Rodriguez Santana** stated, “I don’t have any of—any of this on. The other white stuff, I have a lot” and **Jose Jaquez** responded, “Alright. Alright, no problem. I’ll get you something later.”
- 4) On or about May 29, 2018, **Charlie Rodriguez** and **Jose Jaquez** engaged in a conversation, during which **Charlie Rodriguez** stated, “They liked it, but they said that the other one was better” and **Jose Jaquez** asked “Oh. That it’s not good,” to which **Charlie Rodriguez** responded, “That—that it’s good, but the other one was better. They gave the other one two more points.”
- 5) On or about July 8, 2018, **Charlie Rodriguez** and **Silvia Vidal** engaged in a conversation, during which **Silvia Vidal** stated, “I still gotta finish the boxes. I’ve just been so busy this weekend but I will finish them okay”
- 6) On or about July 11, 2018, **Charlie Rodriguez** and **Robert Goldberg** engaged in a conversation, during which **Robert Goldberg** asked, “Did you change the bags” and **Charlie Rodriguez** responded, “Yeah, I did that for you.”
- 7) On or about July 12, 2018, **Charlie Rodriguez** and **Silvia Vidal** engaged in a conversation, during which **Silvia Vidal** asked, “You have a box with a stamp in it that says X in it. Is that one supposed to be stamped with it”

- and **Charlie Rodriguez**, responded, “Yes. That’s what I meant, I meant to tell you that but I didn’t think you were gonna be working on it so.”
- 8) On or about July 30, 2018, **Charlie Rodriguez** and **Robert Goldberg** engaged in a conversation, during which **Robert Goldberg** stated, “Now listen. I think I’ma be hungry Wednesday.”
 - 9) On or about October 29, 2018, **Carlos Rodriguez Santana** and **Santiago Jose Martinez Sanchez** engaged in a conversation, during which **Santiago Jose Martinez Sanchez** stated, “I—I have something to take to you later on,” to which, **Carlos Rodriguez Santana** stated, “Look. Uh, come so you can pick up some money.”
 - 10) On or about November 25, 2018, **Carlos Rodriguez Santana** and **Santiago Jose Martinez Sanchez** engaged in a conversation, during which **Santiago Jose Martinez Sanchez** asked, “You want the ones I gave you yesterday” and **Carlos Rodriguez Santana** responded, “The ones you gave me yesterday were really good and it was gone immediately.”

COUNT: 3

THE DEFENDANT(S) **ROBERTO GONZALEZ FRANCO, MARIO ALBERTO URBINA GARCIA, OSCAR ALESSANDRO GARCIA, JOHN DOE, A.K.A. SAUL, A.K.A. ALEX, CARLOS RODRIGUEZ SANTANA, CHARLIE RODRIGUEZ, ROBERT GOLDBERG, RAFAEL RODRIGUEZ, JOSE JAQUEZ, SANTIAGO JOSE MARTINEZ SANCHEZ, AND SILVIA VIDAL,** ACTING IN CONCERT WITH EACH OTHER AND OTHERS BOTH KNOWN AND UNKNOWN TO THE GRAND JURY, COMMITTED THE CRIME OF CONSPIRACY IN THE FOURTH DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 105.10(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Roberto Gonzalez Franco, Mario Alberto Urbina Garcia, Oscar Alessandro Garcia, John Doe, a.k.a. Saul, a.k.a. Alex, Carlos Rodriguez Santana, Charlie Rodriguez, Robert Goldberg, Rafael Rodriguez, Jose Jaquez, Santiago Jose Martinez Sanchez, and Silvia Vidal,** acting in concert with Each Other and Others Both Known and Unknown to the Grand Jury, **on or about and between October 17, 2017 and May 22, 2019,** in Bronx County, New York, Chicago, Illinois, and elsewhere, intending that conduct constituting a class B or class C felony be performed, that felony being Criminal Sale of a Controlled Substance in the Third Degree, agreed with one or more persons to engage in or cause the performance of such conduct.

PREAMBLE

It was the purpose of this conspiracy to possess, transport, sell, and distribute narcotics in Bronx County, New York and elsewhere.

It was a part of this conspiracy that **Roberto Gonzalez Franco, Mario Alberto Urbina Garcia, Oscar Alessandro Garcia, and John Doe, a.k.a. Saul, a.k.a. Alex,** worked together to obtain narcotics for distribution.

It was part of this conspiracy that narcotics be transported from outside of the Northeastern United States to the Northeastern United States for distribution.

It was a part of this conspiracy that **Roberto Gonzalez Franco, Mario Alberto Urbina Garcia, and Oscar Alessandro Garcia** supplied narcotics to **John Doe, a.k.a. Saul, a.k.a. Alex** for distribution in Bronx County.

It was a part of this conspiracy that **John Doe, a.k.a. Saul, a.k.a. Alex** supplied narcotics to **Carlos Rodriguez Santana and Charlie Rodriguez.**

It was part of this conspiracy that **Jose Jaquez and Santiago Jose Martinez Sanchez** supplied narcotics to **Carlos Rodriguez Santana and Charlie Rodriguez.**

It was part of this conspiracy that **Carlos Rodriguez Santana** worked with **Charlie Rodriguez** to prepare narcotics and distribute narcotics to individuals both known and unknown.

It was part of this conspiracy that **Charlie Rodriguez** provided narcotics to **Robert Goldberg** and **Rafael Rodriguez**.

It was part of this conspiracy that **Charlie Rodriguez** and **Silvia Vidal** prepared narcotics for distribution.

It was also part of this conspiracy for its members to communicate with each other and others over cellular telephones using coded, guarded, and cryptic language.

OVERT ACTS

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

- 1) On or about February 17, 2018, **Charlie Rodriguez** and **Rafael Rodriguez** engaged in a conversation, during which **Rafael Rodriguez** stated, "Alright and yo, man. The same number, fourteen. And if you got one or two loose ones, that'd be cool."
- 2) On or about February 21, 2018, **Charlie Rodriguez** and **Rafael Rodriguez** engaged in a conversation, during which **Rafael Rodriguez** asked, "You know what I'm talking about" and **Rafael Rodriguez** later stated, "The dog food," and "Two packages," to which **Charlie Rodriguez** responded, "Alright."
- 3) On or about May 2, 2018, **Carlos Rodriguez Santana** and **Jose Jaquez** engaged in a conversation, during which **Carlos Rodriguez Santana** stated, "I don't have any of—any of this on. The other white stuff, I have a lot." and **Jose Jaquez** responded, "Alright. Alright, no problem. I'll get you something later."
- 4) On or about May 29, 2018, **Charlie Rodriguez** and **Jose Jaquez** engaged in a conversation, during which **Charlie Rodriguez** stated, "They liked it, but they said that the other one was better" and **Jose Jaquez** asked, "Oh. That it's not good," to which **Charlie Rodriguez** responded, "That—that it's good, but the other one was better. They gave the other one two more points."

- 5) On or about July 8, 2018, **Charlie Rodriguez** and **Silvia Vidal** engaged in a conversation, during which **Silvia Vidal** stated, “I still gotta finish the boxes. I’ve just been so busy this weekend but I will finish them okay.”
- 6) On or about July 11, 2018, **Charlie Rodriguez** and **Robert Goldberg** engaged in a conversation, during which **Robert Goldberg** inquired, “Did you change the bags” and **Charlie Rodriguez** responded, “Yeah, I did that for you.”
- 7) On or about July 12, 2018, **Charlie Rodriguez** and **Silvia Vidal** engaged in a conversation, during which **Silvia Vidal** asked, “You have a box with a stamp in it that says X in it. Is that one supposed to be stamped with it” and **Charlie Rodriguez**, responded, “Yes. That’s what I meant, I meant to tell you that but I didn’t think you were gonna be working on it so.”
- 8) On or about July 30, 2018, **Charlie Rodriguez** and **Robert Goldberg** engaged in a conversation, during which **Robert Goldberg** stated, “Now listen. I think I’ma be hungry Wednesday.”
- 9) On or about September 15, 2018, **Roberto Gonzalez Franco**, **Oscar Alessandro Garcia**, and **Mario Alberto Urbina Garcia**, met inside of a Panera Bread located in Bronx County, and discussed the transport and distribution of narcotics into Bronx County and other locations in the Northeastern United States.
- 10) On or about October 26, 2018, **Carlos Rodriguez Santana** and **Charlie Rodriguez** engaged in a conversation, during which **Carlos Rodriguez Santana** stated, “There are thirty-seven bundles,” and **Charlie Rodriguez** responded, “I’m going to call him...in fact I’m going to wait because he’s only getting twenty-three, he said to take them over there and said if—if he doesn’t like it he is going to come over here.”
- 11) On or about October 29, 2018, **Roberto Gonzalez Franco**, **Mario Alberto Urbina Garcia**, **John Doe**, a.k.a. **Saul**, a.k.a. **Alex** and other individuals both known and unknown to the Grand Jury, met inside a restaurant located at 240 West 231st Street, in Bronx County, and discussed the distribution of narcotics in Bronx County and other locations in the Northeastern United States.
- 12) On or about October 29, 2018, **Carlos Rodriguez Santana** and **Santiago Jose Martinez Sanchez** engaged in a conversation, during which **Santiago Jose Martinez Sanchez** stated, “I—I have something to take to you later on,” to which, **Carlos Rodriguez Santana** stated, “Look. Uh, come so you can pick up some money.”

- 13) On or about November 4, 2018, **John Doe, a.k.a., Saul, a.k.a. Alex** and **Carlos Rodriguez Santana**, engaged in a conversation, during which **Carlos Rodriguez Santana** stated, "Try it, and give me samples of those to see if people like it."
- 14) On or about November 6, 2018, **John Doe, a.k.a., Saul, a.k.a. Alex** and **Carlos Rodriguez Santana**, engaged in a conversation, during which **John Doe, a.k.a., Saul, a.k.a. Alex** stated, "They are preparing something for me right here."
- 15) On or about November 6, 2018, **Carlos Rodriguez Santana** and **Charlie Rodriguez** engaged in a conversation, during which **Carlos Rodriguez Santana** stated, "Look...later, I'm going to call you later, to give you a sample that they're bringing me" and **Charlie** responded, "Okay. I'll pass right now then..."
- 16) On or about November 25, 2018, **Carlos Rodriguez Santana** and **Santiago Jose Martinez Sanchez** engaged in a conversation, during which **Santiago Jose Martinez Sanchez** asked, "You want the ones I gave you yesterday" and **Carlos Rodriguez Santana** responded, "The ones you gave me yesterday were really good and it was gone immediately."
- 17) On or about February 3, 2019, **John Doe, a.k.a., Saul, a.k.a. Alex** and **Carlos Rodriguez Santana**, engaged in a conversation, during which **John Doe, a.k.a., Saul, a.k.a. Alex** asked, "Carlos, five hundred or how much" and **Carlos Rodriguez Santana** responded, "Whatever you can. What you can," and **John Doe, a.k.a., Saul, a.k.a. Alex** stated, "Look, they are coming to bring it to me now."
- 18) On or about February 3, 2019, **John Doe, a.k.a., Saul, a.k.a. Alex** and **Oscar Alessandro Garcia**, engaged in a conversation, during which **Oscar Alessandro Garcia** stated, "I'm around here on fifty-six," and **John Doe, a.k.a., Saul, a.k.a. Alex** responded, "Alright then, come over here."
- 19) On or about February 7, 2019, **Roberto Gonzalez Franco, Oscar Alessandro Garcia**, and **Mario Alberto Urbina Garcia**, and other individuals both known and unknown to the Grand Jury, met at the Cicero Hotel, located at 4501 South Cicero Avenue in Chicago, Illinois.
- 20) On or about February 8, 2019, **Oscar Alessandro Garcia** and **Mario Alberto Urbina Garcia** placed fentanyl into a Chevrolet Traverse in the parking lot of the Cicero Hotel.
- 21) On or about February 8, 2019, at approximately 5:12 a.m., **Mario Alberto Urbina Garcia** departed the Cicero Hotel parking lot inside of a Chevrolet Traverse.

22) On or about February 8, 2019, at approximately 5:12 a.m., **Roberto Gonzalez Franco** and **Oscar Alessandro Garcia** were in the red Dodge Charger (Pennsylvania registration KLJ1398) as **Oscar Alessandro Garcia** drove it out of the parking lot of the Cicero Hotel.

23) **Roberto Gonzalez Franco** discussed the transportation of narcotics from Chicago, Illinois to the Northeastern United States.

COUNT: 4

THE DEFENDANT(S) **ROBERTO GONZALEZ FRANCO** COMMITTED THE CRIME OF OPERATING AS A MAJOR TRAFFICKER, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.77(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Roberto Gonzalez Franco** on or about and between **September 15, 2018 and February 8, 2019**, in Bronx County and elsewhere, did act as the director of a controlled substance organization, during any period of twelve months or less, during which period such controlled substance organization sold one or more controlled substances to wit, heroin and fentanyl, and the proceeds collected or due from such sale or sales had a total aggregate value of seventy-five thousand dollars or more.

COUNT: 5

THE DEFENDANT(S) **ROBERTO GONZALEZ FRANCO** COMMITTED THE CRIME OF OPERATING AS A MAJOR TRAFFICKER, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.77(3), COMMITTED AS FOLLOWS:

The Defendant(s) **Roberto Gonzalez Franco on or about and between September 15, 2018 and February 8, 2019**, in Bronx 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, fentanyl, with intent to sell the same, and such narcotic drug having a total aggregate value of seventy-five thousand dollars or more.

COUNT: 6

THE DEFENDANT(S) **OSCAR ALESSANDRO GARCIA** COMMITTED THE CRIME OF OPERATING AS A MAJOR TRAFFICKER, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.77(3), COMMITTED AS FOLLOWS:

The Defendant(s) **Oscar Alessandro Garcia on or about and between September 15, 2018 and February 8, 2019**, in Bronx 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, fentanyl, with intent to sell the same, and such narcotic drug having a total aggregate value of seventy-five thousand dollars or more.

COUNT: 7

THE DEFENDANT(S) **JOHN DOE, A.K.A. SAUL, A.K.A. ALEX** COMMITTED THE CRIME OF OPERATING AS A MAJOR TRAFFICKER, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.77(3), COMMITTED AS FOLLOWS:

The Defendant(s) **John Doe, a.k.a. Saul, a.k.a. Alex on or about and between September 15, 2018 and February 8, 2019**, in Bronx 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, fentanyl, with intent to sell the same, and such narcotic drug having a total aggregate value of seventy-five thousand dollars or more.

COUNT: 8

THE DEFENDANT(S) **JOHN DOE, A.K.A. SAUL, A.K.A. ALEX** COMMITTED THE CRIME OF OPERATING AS A MAJOR TRAFFICKER, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.77(2), COMMITTED AS FOLLOWS:

The Defendant(s) **John Doe, a.k.a. Saul, a.k.a. Alex** on or about and between **September 15, 2018 and February 8, 2019**, in Bronx County and elsewhere, as a profiteer, knowingly and unlawfully sold, on one or more occasions a narcotic drug, to wit, heroin, and the proceeds collected or due from such sale or sales have a total aggregate value of at least seventy-five thousand dollars.

COUNT: 9

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.41(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez** on or about **October 17, 2017**, in Bronx County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin and said preparations, compounds, mixtures or substances are of an aggregate weight of one-half ounce or more.

COUNT: 10

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez** on or about **October 17, 2017**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 11

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez** on or about **October 17, 2017**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 12

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(12), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about October 17, 2017**, in Bronx County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin and said preparations, compounds, mixtures or substances are of an aggregate weight of one-half ounce or more.

COUNT: 13

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about November 1, 2017**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, cocaine.

COUNT: 14

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about November 1, 2017**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT: 15

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.09(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about November 1, 2017**, in Bronx County, 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 are of an aggregate weight of one-eighth ounce or more.

COUNT: 16

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about November 6, 2017**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, cocaine.

COUNT: 17

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about November 6, 2017**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT: 18

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.09(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about November 6, 2017**, in Bronx County, 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 are of an aggregate weight of one-eighth ounce or more.

COUNT: 19

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about November 6, 2017**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 20

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about November 6, 2017**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 21

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.09(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about November 6, 2017**, in Bronx County, did knowingly and unlawfully possess: one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit heroin, and said preparations, compounds, mixtures or substances are of an aggregate weight of one-eighth ounce or more.

COUNT: 22

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.41(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about November 16, 2017**, in Bronx County, 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 are of an aggregate weight of one-half ounce or more.

COUNT: 23

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about November 16, 2017**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, cocaine.

COUNT: 24

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about November 16, 2017**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT: 25

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(12), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about November 16, 2017**, in Bronx County, 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 are of an aggregate weight of one-half ounce or more.

COUNT: 26

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.09(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about November 16, 2017**, in Bronx County, 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 are of an aggregate weight of one-eighth ounce or more.

COUNT: 27

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.43(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about December 12, 2017**, in Bronx County, 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 are of an aggregate weight of two ounces or more.

COUNT: 28

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.41(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about December 12, 2017**, in Bronx County, 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 are of an aggregate weight of one-half ounce or more.

COUNT: 29

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about December 12, 2017**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, cocaine.

COUNT: 30

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about December 12, 2017**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT: 31

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(12), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about December 12, 2017**, in Bronx County, 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 are of an aggregate weight of one-half ounce or more.

COUNT: 32

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.09(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about December 12, 2017**, in Bronx County, 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 are of an aggregate weight of one-eighth ounce or more.

COUNT: 33

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.41(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about and between February 19, 2018 and February 20, 2018**, in Bronx County, 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 are of an aggregate weight of one-half ounce or more.

COUNT: 34

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about and between February 19, 2018 and February 20, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, cocaine.

COUNT: 35

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about and between February 19, 2018 and February 20, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT: 36

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(12), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about and between February 19, 2018 and February 20, 2018**, in Bronx County, 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 are of an aggregate weight of one-half ounce or more.

COUNT: 37

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.09(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about and between February 19, 2018 and February 20, 2018**, in Bronx County, 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 are of an aggregate weight of one-eighth ounce or more.

COUNT: 38

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about and between February 19, 2018 and February 20, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 39

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about and between February 19, 2018 and February 20, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 40

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about June 26, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 41

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about June 26, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 42

THE DEFENDANT(S) **ROBERT GOLDBERG** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Robert Goldberg on or about June 27, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 43

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about February 17, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 44

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about February 17, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 45

THE DEFENDANT(S) **RAFAEL RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Rafael Rodriguez on or about February 18, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 46

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about February 21, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 47

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about February 21, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 48

THE DEFENDANT(S) **RAFAEL RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Rafael Rodriguez on or about February 22, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 49

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about March 4, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 50

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about March 4, 2018**, in Bronx County, and elsewhere did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 51

THE DEFENDANT(S) **RAFAEL RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Rafael Rodriguez on or about March 4, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 52

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about March 10, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 53

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about March 10, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 54

THE DEFENDANT(S) **RAFAEL RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Rafael Rodriguez on or about March 11, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 55

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about July 5, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 56

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about July 5, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 57

THE DEFENDANT(S) **RAFAEL RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Rafael Rodriguez on or about July 5, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 58

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about July 29, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 59

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about July 29, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 60

THE DEFENDANT(S) **RAFAEL RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Rafael Rodriguez on or about July 29, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 61

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about June 7, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 62

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about June 7, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 63

THE DEFENDANT(S) **ROBERT GOLDBERG** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Robert Goldberg on or about June 7, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 64

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about June 9, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 65

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about June 9, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 66

THE DEFENDANT(S) **ROBERT GOLDBERG** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Robert Goldberg on or about June 9 , 2018**, in Bronx County and elsewhere, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 67

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about July 8, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 68

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about July 8, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 69

THE DEFENDANT(S) **ROBERT GOLDBERG** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Robert Goldberg on or about July 8, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 70

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about July 11, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 71

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about July 11, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 72

THE DEFENDANT(S) **ROBERT GOLDBERG** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Robert Goldberg on or about July 12, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 73

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about July 30, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 74

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about July 30, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 75

THE DEFENDANT(S) **ROBERT GOLDBERG** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Robert Goldberg on or about August 1, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 76

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about August 5, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 77

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about August 5, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 78

THE DEFENDANT(S) **ROBERT GOLDBERG** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Robert Goldberg on or about August 5, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 79

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana on or about June 23, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 80

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana on or about June 23, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 81

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana on or about July 22, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, cocaine.

COUNT: 82

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana** on or about **July 22, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT: 83

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA**, ACTING IN CONCERT WITH OTHERS BOTH KNOWN AND UNKNOWN TO THE GRAND JURY, COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana**, acting in concert with Others Both Known and Unknown to the Grand Jury, on or about **August 2, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, cocaine.

COUNT: 84

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA**, ACTING IN CONCERT WITH OTHERS BOTH KNOWN AND UNKNOWN TO THE GRAND JURY, COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana**, acting in concert with Others Both Known and Unknown to the Grand Jury, on or about **August 2, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT: 85

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana** on or about **August 4, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, cocaine.

COUNT: 86

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana on or about August 4, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT: 87

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana on or about October 7, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 88

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana on or about October 7, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 89

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana on or about November 26, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT: 90

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana** on or about **November 28, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 91

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana** on or about **November 28, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 92

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA**, ACTING IN CONCERT WITH OTHERS BOTH KNOWN AND UNKNOWN TO THE GRAND JURY, COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana**, acting in concert with Others Both Known and Unknown to the Grand Jury, on or about **December 8, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 93

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA**, ACTING IN CONCERT WITH OTHERS BOTH KNOWN AND UNKNOWN TO THE GRAND JURY, COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana**, acting in concert with Others Both Known and Unknown to the Grand Jury, on or about **December 8, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 94

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana** on or about **December 14, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 95

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana** on or about **December 14, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 96

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA**, ACTING IN CONCERT WITH OTHERS BOTH KNOWN AND UNKNOWN TO THE GRAND JURY, COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana**, acting in concert with Others Both Known and Unknown to the Grand Jury, on or about **December 17, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, cocaine.

COUNT: 97

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA**, ACTING IN CONCERT WITH OTHERS BOTH KNOWN AND UNKNOWN TO THE GRAND JURY, COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana**, acting in concert with Others Both Known and Unknown to the Grand Jury, on or about **December 17, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT: 98

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana on or about February 4, 2019**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 99

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana on or about February 4, 2019**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 100

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana on or about March 1, 2019**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, cocaine.

COUNT: 101

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana on or about March 1, 2019**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT: 102

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana on or about October 11, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 103

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana on or about October 11, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 104

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana on or about June 25, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 105

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana on or about June 25, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 106

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana on or about June 25, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, cocaine.

COUNT: 107

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana on or about June 25, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it, with intent to sell it.

COUNT: 108

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana on or about July 3, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, cocaine.

COUNT: 109

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana on or about July 3, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT: 110

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana on or about July 3, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, cocaine.

COUNT: 111

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana on or about July 3, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT: 112

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana on or about January 24, 2019**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 113

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana on or about January 24, 2019**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 114

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana on or about March 26, 2019**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 115

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana on or about March 26, 2019**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 116

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana on or about April 13, 2019**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 117

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana on or about April 13, 2019**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 118

THE DEFENDANT(S) **JOSE JAQUEZ** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Jose Jaquez on or about April 8, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 119

THE DEFENDANT(S) **JOSE JAQUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Jose Jaquez on or about April 8, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 120

THE DEFENDANT(S) **JOSE JAQUEZ** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Jose Jaquez on or about April 8, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, cocaine.

COUNT: 121

THE DEFENDANT(S) **JOSE JAQUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Jose Jaquez on or about April 8, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT: 122

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA AND CHARLIE RODRIGUEZ**, ACTING IN CONCERT WITH EACH OTHER, COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana and Charlie Rodriguez**, acting in concert with each other, **on or about April 8, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 123

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA AND CHARLIE RODRIGUEZ**, ACTING IN CONCERT WITH EACH OTHER, COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana and Charlie Rodriguez**, acting in concert with each other, **on or about April 8, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT: 124

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana on or about May 2, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT: 125

THE DEFENDANT(S) **JOSE JAQUEZ** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.43(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Jose Jaquez on or about May 19, 2018**, in Bronx County, 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 are of an aggregate weight of two ounces or more.

COUNT: 126

THE DEFENDANT(S) **JOSE JAQUEZ** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Jose Jaquez on or about May 19, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, cocaine.

COUNT: 127

THE DEFENDANT(S) **JOSE JAQUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.18(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Jose Jaquez on or about May 19, 2018**, in Bronx County, 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 are of an aggregate weight of four ounces or more.

COUNT: 128

THE DEFENDANT(S) **JOSE JAQUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Jose Jaquez on or about May 19, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT: 129

THE DEFENDANT(S) **JOSE JAQUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.09(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Jose Jaquez on or about May 19, 2018**, in Bronx County, 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 are of an aggregate weight of one-eighth ounce or more.

COUNT: 130

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.18(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana on or about May 19, 2018**, in Bronx County, 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 are of an aggregate weight of four ounces or more.

COUNT: 131

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana on or about May 19, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT: 132

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about and between May 19, 2018 and May 20, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, cocaine.

COUNT: 133

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about and between May 19, 2018 and May 20, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT: 134

THE DEFENDANT(S) **JOSE JAQUEZ** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Jose Jaquez on or about May 29, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, cocaine.

COUNT: 135

THE DEFENDANT(S) **JOSE JAQUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Jose Jaquez on or about May 29, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT: 136

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA AND CHARLIE RODRIGUEZ**, ACTING IN CONCERT WITH EACH OTHER, COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana and Charlie Rodriguez**, acting in concert with each other, **on or about May 29, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT: 137

THE DEFENDANT(S) **JOSE JAQUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Jose Jaquez on or about June 1, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT: 138

THE DEFENDANT(S) **JOSE JAQUEZ** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Jose Jaquez on or about June 3, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 139

THE DEFENDANT(S) **JOSE JAQUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Jose Jaquez on or about June 3, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 140

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA AND CHARLIE RODRIGUEZ**, ACTING IN CONCERT WITH EACH OTHER, COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana and Charlie Rodriguez**, acting in concert with each other, **on or about and between June 2, 2018 and June 3, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 141

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA AND CHARLIE RODRIGUEZ**, ACTING IN CONCERT WITH EACH OTHER, COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana and Charlie Rodriguez**, acting in concert with each other, **on or about June 7, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT: 142

THE DEFENDANT(S) **JOSE JAQUEZ** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Jose Jaquez on or about June 23, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 143

THE DEFENDANT(S) **JOSE JAQUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Jose Jaquez on or about June 23, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 144

THE DEFENDANT(S) **CHARLIE RODRIGUEZ** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Charlie Rodriguez on or about June 23, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 145

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA AND CHARLIE RODRIGUEZ**, ACTING IN CONCERT WITH EACH OTHER, COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana and Charlie Rodriguez**, acting in concert with each other, **on or about July 9, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, cocaine.

COUNT: 146

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA AND CHARLIE RODRIGUEZ**, ACTING IN CONCERT WITH EACH OTHER, COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana and Charlie Rodriguez**, acting in concert with each other, **on or about July 9, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT: 147

THE DEFENDANT(S) **JOSE JAQUEZ AND SANTIAGO JOSE MARTINEZ SANCHEZ** ACTING IN CONCERT WITH EACH OTHER COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Jose Jaquez and Santiago Jose Martinez Sanchez** acting in concert with each other **on or about August 29, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 148

THE DEFENDANT(S) **JOSE JAQUEZ AND SANTIAGO JOSE MARTINEZ SANCHEZ** ACTING IN CONCERT WITH EACH OTHER COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Jose Jaquez and Santiago Jose Martinez Sanchez** acting in concert with each other **on or about August 29, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 149

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana** on or about **August 29, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 150

THE DEFENDANT(S) **JOSE JAQUEZ AND SANTIAGO JOSE MARTINEZ SANCHEZ** ACTING IN CONCERT WITH EACH OTHER COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Jose Jaquez** and **Santiago Jose Martinez Sanchez** acting in concert with each other on or about **September 8, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 151

THE DEFENDANT(S) **JOSE JAQUEZ AND SANTIAGO JOSE MARTINEZ SANCHEZ** ACTING IN CONCERT WITH EACH OTHER COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Jose Jaquez** and **Santiago Jose Martinez Sanchez** acting in concert with each other on or about **September 8, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 152

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA AND CHARLIE RODRIGUEZ**, ACTING IN CONCERT WITH EACH OTHER, COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana** and **Charlie Rodriguez**, acting in concert with each other, on or about **September 8, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 153

THE DEFENDANT(S) **JOSE JAQUEZ AND SANTIAGO JOSE MARTINEZ SANCHEZ** ACTING IN CONCERT WITH EACH OTHER COMMITTED THE

CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Jose Jaquez** and **Santiago Jose Martinez Sanchez** acting in concert with each other **on or about September 14, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 154

THE DEFENDANT(S) **JOSE JAQUEZ AND SANTIAGO JOSE MARTINEZ SANCHEZ** ACTING IN CONCERT WITH EACH OTHER COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Jose Jaquez** and **Santiago Jose Martinez Sanchez** acting in concert with each other **on or about September 14, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 155

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana** **on or about September 14, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 156

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA AND CHARLIE RODRIGUEZ**, ACTING IN CONCERT WITH EACH OTHER, COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana and Charlie Rodriguez**, acting in concert with each other, **on or about September 17, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 157

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA AND CHARLIE RODRIGUEZ**, ACTING IN CONCERT WITH EACH OTHER, COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana and Charlie Rodriguez**, acting in concert with each other, **on or about October 6, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 158

THE DEFENDANT(S) **JOSE JAQUEZ AND SANTIAGO JOSE MARTINEZ SANCHEZ** ACTING IN CONCERT WITH EACH OTHER COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Jose Jaquez and Santiago Jose Martinez Sanchez** acting in concert with each other **on or about October 7, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 159

THE DEFENDANT(S) **JOSE JAQUEZ AND SANTIAGO JOSE MARTINEZ SANCHEZ** ACTING IN CONCERT WITH EACH OTHER COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Jose Jaquez and Santiago Jose Martinez Sanchez** acting in concert with each other **on or about October 7, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 160

THE DEFENDANT(S) **JOSE JAQUEZ AND SANTIAGO JOSE MARTINEZ SANCHEZ** ACTING IN CONCERT WITH EACH OTHER COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Jose Jaquez** and **Santiago Jose Martinez Sanchez** acting in concert with each other **on or about October 25, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 161

THE DEFENDANT(S) **JOSE JAQUEZ AND SANTIAGO JOSE MARTINEZ SANCHEZ** ACTING IN CONCERT WITH EACH OTHER COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Jose Jaquez** and **Santiago Jose Martinez Sanchez** acting in concert with each other **on or about October 25, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 162

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA AND CHARLIE RODRIGUEZ**, ACTING IN CONCERT WITH EACH OTHER, COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana and Charlie Rodriguez**, acting in concert with each other, **on or about October 26, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 163

THE DEFENDANT(S) **JOSE JAQUEZ AND SANTIAGO JOSE MARTINEZ SANCHEZ** ACTING IN CONCERT WITH EACH OTHER COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Jose Jaquez** and **Santiago Jose Martinez Sanchez** acting in concert with each other **on or about October 29, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 164

THE DEFENDANT(S) **JOSE JAQUEZ AND SANTIAGO JOSE MARTINEZ SANCHEZ** ACTING IN CONCERT WITH EACH OTHER COMMITTED THE

CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Jose Jaquez** and **Santiago Jose Martinez Sanchez** acting in concert with each other **on or about October 29, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 165

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA AND CHARLIE RODRIGUEZ**, ACTING IN CONCERT WITH EACH OTHER, COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana and Charlie Rodriguez**, acting in concert with each other, **on or about October 29, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 166

THE DEFENDANT(S) **JOSE JAQUEZ AND SANTIAGO JOSE MARTINEZ SANCHEZ** ACTING IN CONCERT WITH EACH OTHER COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Jose Jaquez** and **Santiago Jose Martinez Sanchez** acting in concert with each other **on or about November 1, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 167

THE DEFENDANT(S) **JOSE JAQUEZ AND SANTIAGO JOSE MARTINEZ SANCHEZ** ACTING IN CONCERT WITH EACH OTHER COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Jose Jaquez** and **Santiago Jose Martinez Sanchez** acting in concert with each other **on or about November 1, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 168

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana** on or about **November 1, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 169

THE DEFENDANT(S) **JOSE JAQUEZ AND SANTIAGO JOSE MARTINEZ SANCHEZ** ACTING IN CONCERT WITH EACH OTHER COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Jose Jaquez and Santiago Jose Martinez Sanchez** acting in concert with each other on or about **November 12, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 170

THE DEFENDANT(S) **JOSE JAQUEZ AND SANTIAGO JOSE MARTINEZ SANCHEZ** ACTING IN CONCERT WITH EACH OTHER COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Jose Jaquez and Santiago Jose Martinez Sanchez** acting in concert with each other on or about **November 12, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 171

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana** on or about **November 12, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 172

THE DEFENDANT(S) **JOSE JAQUEZ AND SANTIAGO JOSE MARTINEZ SANCHEZ** ACTING IN CONCERT WITH EACH OTHER COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Jose Jaquez and Santiago Jose Martinez Sanchez** acting in concert with each other **on or about November 13, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 173

THE DEFENDANT(S) **JOSE JAQUEZ AND SANTIAGO JOSE MARTINEZ SANCHEZ** ACTING IN CONCERT WITH EACH OTHER COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Jose Jaquez and Santiago Jose Martinez Sanchez** acting in concert with each other **on or about November 13, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 174

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana** **on or about November 13, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 175

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA AND CHARLIE RODRIGUEZ**, ACTING IN CONCERT WITH EACH OTHER, COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana and Charlie Rodriguez**, acting in concert with each other, **on or about November 27, 2018**, in Bronx County, did

knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 176

THE DEFENDANT(S) **JOHN DOE, A.K.A. SAUL, A.K.A. ALEX** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **John Doe, a.k.a. Saul, a.k.a. Alex** on or about August 16, 2018, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 177

THE DEFENDANT(S) **JOHN DOE, A.K.A. SAUL, A.K.A. ALEX** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **John Doe, a.k.a. Saul, a.k.a. Alex** on or about August 16, 2018, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 178

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA AND CHARLIE RODRIGUEZ**, ACTING IN CONCERT WITH EACH OTHER, COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana and Charlie Rodriguez**, acting in concert with each other, **on or about August 17, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 179

THE DEFENDANT(S) **JOHN DOE, A.K.A. SAUL, A.K.A. ALEX** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.43(1), COMMITTED AS FOLLOWS:

The Defendant(s) **John Doe, a.k.a. Saul, a.k.a. Alex** on or about and between August 18, 2018 and August 25, 2018, in Bronx County, did knowingly and

unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin and said preparations, compounds, mixtures or substances are of an aggregate weight of two ounces or more.

COUNT: 180

THE DEFENDANT(S) **JOHN DOE, A.K.A. SAUL, A.K.A. ALEX** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **John Doe, a.k.a. Saul, a.k.a. Alex** on or about and between **August 18, 2018 and August 25, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 181

THE DEFENDANT(S) **JOHN DOE, A.K.A. SAUL, A.K.A. ALEX** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.18(1), COMMITTED AS FOLLOWS:

The Defendant(s) **John Doe, a.k.a. Saul, a.k.a. Alex** on or about and between **August 18, 2018 and August 25, 2018**, in Bronx County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin and said preparations, compounds, mixtures or substances are of an aggregate weight of four ounces or more.

COUNT: 182

THE DEFENDANT(S) **JOHN DOE, A.K.A. SAUL, A.K.A. ALEX** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **John Doe, a.k.a. Saul, a.k.a. Alex** on or about and between **August 18, 2018 and August 25, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 183

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA AND CHARLIE RODRIGUEZ**, ACTING IN CONCERT WITH EACH OTHER, COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.18(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana and Charlie Rodriguez**, acting in concert with each other, **on or about August 25, 2018**, in Bronx County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin and said preparations, compounds, mixtures or substances are of an aggregate weight of four ounces or more.

COUNT: 184

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA AND CHARLIE RODRIGUEZ**, ACTING IN CONCERT WITH EACH OTHER, COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana and Charlie Rodriguez**, acting in concert with each other, **on or about August 25, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 185

THE DEFENDANT(S) **ROBERTO GONZALEZ FRANCO** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.21(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Roberto Gonzalez Franco on or about September 26, 2018**, in Bronx County, State of Ohio, and elsewhere, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin and said preparations, compounds, mixtures or substances are of an aggregate weight of eight ounces or more.

COUNT: 186

THE DEFENDANT(S) **ROBERTO GONZALEZ FRANCO** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Roberto Gonzalez Franco** on or about **September 26, 2018**, in Bronx County, State of Ohio, elsewhere, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 187

THE DEFENDANT(S) **ROBERTO GONZALEZ FRANCO, OSCAR ALESSANDRO GARCIA, AND JOHN DOE, A.K.A. SAUL, A.K.A. ALEX**, ACTING IN CONCERT WITH EACH OTHER, COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.21(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Roberto Gonzalez Franco, Oscar Alessandro Garcia, and John Doe, a.k.a. Saul, a.k.a. Alex**, acting in concert with each other, **on or about and between September 26, 2018 and September 28, 2018**, in Bronx County, Boston, Massachusetts, and elsewhere, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin and said preparations, compounds, mixtures or substances are of an aggregate weight of eight ounces or more.

COUNT: 188

THE DEFENDANT(S) **ROBERTO GONZALEZ FRANCO, OSCAR ALESSANDRO GARCIA, AND JOHN DOE, A.K.A. SAUL, A.K.A. ALEX**, ACTING IN CONCERT WITH EACH OTHER, COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Roberto Gonzalez Franco, Oscar Alessandro Garcia, and John Doe, a.k.a. Saul, a.k.a. Alex**, acting in concert with each other, **on or about and between September 26, 2018 and September 28, 2018**, in Bronx County, Boston, Massachusetts, elsewhere, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 189

THE DEFENDANT(S) **ROBERTO GONZALEZ FRANCO, OSCAR ALESSANDRO GARCIA, AND JOHN DOE, A.K.A. SAUL, A.K.A. ALEX,** ACTING IN CONCERT WITH EACH OTHER, COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.21(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Roberto Gonzalez Franco, Oscar Alessandro Garcia, and John Doe, a.k.a. Saul, a.k.a. Alex,** acting in concert with each other, **on or about October 22, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin and said preparations, compounds, mixtures or substances are of an aggregate weight of eight ounces or more.

COUNT: 190

THE DEFENDANT(S) **ROBERTO GONZALEZ FRANCO, OSCAR ALESSANDRO GARCIA, AND JOHN DOE, A.K.A. SAUL, A.K.A. ALEX,** ACTING IN CONCERT WITH EACH OTHER, COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Roberto Gonzalez Franco, Oscar Alessandro Garcia, and John Doe, a.k.a. Saul, a.k.a. Alex,** acting in concert with each other, **on or about October 22, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 191

THE DEFENDANT(S) **JOHN DOE, A.K.A. SAUL, A.K.A. ALEX** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.43(1), COMMITTED AS FOLLOWS:

The Defendant(s) **John Doe, a.k.a. Saul, a.k.a. Alex** **on or about October 23, 2018**, in Bronx County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin and said preparations, compounds, mixtures or substances are of an aggregate weight of two ounces or more.

COUNT: 192

THE DEFENDANT(S) **JOHN DOE, A.K.A. SAUL, A.K.A. ALEX** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **John Doe, a.k.a. Saul, a.k.a. Alex** on or about **October 23, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 193

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.21(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana** on or about **October 23, 2018**, in Bronx County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin and said preparations, compounds, mixtures or substances are of an aggregate weight of eight ounces or more.

COUNT: 194

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana** on or about **October 23, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 195

THE DEFENDANT(S) **ROBERTO GONZALEZ FRANCO AND JOHN DOE, A.K.A. SAUL, A.K.A. ALEX**, ACTING IN CONCERT WITH EACH OTHER, COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.21(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Roberto Gonzalez Franco and John Doe, a.k.a. Saul, a.k.a. Alex** acting in concert with each other, on or about **October 25, 2018**, in Bronx County, Seattle, Washington, and elsewhere, did knowingly and unlawfully possess

one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin and said preparations, compounds, mixtures or substances are of an aggregate weight of eight ounces or more.

COUNT: 196

THE DEFENDANT(S) **ROBERTO GONZALEZ FRANCO AND JOHN DOE, A.K.A. SAUL, A.K.A. ALEX**, ACTING IN CONCERT WITH EACH OTHER, COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Roberto Gonzalez Franco and John Doe, a.k.a. Saul, a.k.a. Alex**, acting in concert with each other, **on or about October 25, 2018**, in Bronx County, Seattle, Washington, and elsewhere, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 197

THE DEFENDANT(S) **ROBERTO GONZALEZ FRANCO, OSCAR ALESSANDRO GARCIA, AND JOHN DOE, A.K.A. SAUL, A.K.A. ALEX**, ACTING IN CONCERT WITH EACH OTHER, COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.21(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Roberto Gonzalez Franco, Oscar Alessandro Garcia, and John Doe, a.k.a. Saul, a.k.a. Alex**, acting in concert with each other, **on or about October 27, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin and said preparations, compounds, mixtures or substances are of an aggregate weight of eight ounces or more.

COUNT: 198

THE DEFENDANT(S) **ROBERTO GONZALEZ FRANCO, OSCAR ALESSANDRO GARCIA, AND JOHN DOE, A.K.A. SAUL, A.K.A. ALEX**, ACTING IN CONCERT WITH EACH OTHER, COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Roberto Gonzalez Franco, Oscar Alessandro Garcia, and John Doe, a.k.a. Saul, a.k.a. Alex**, acting in concert with each other, **on or about**

October 27, 2018, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 199

THE DEFENDANT(S) **JOHN DOE, A.K.A. SAUL, A.K.A. ALEX** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **John Doe, a.k.a. Saul, a.k.a. Alex** on or about **October 27, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 200

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana** on or about **October 27, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 201

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana** on or about **October 27, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 202

THE DEFENDANT(S) **ROBERTO GONZALEZ FRANCO, OSCAR ALESSANDRO GARCIA, AND JOHN DOE, A.K.A. SAUL, A.K.A. ALEX**, ACTING IN CONCERT WITH EACH OTHER, COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Roberto Gonzalez Franco, Oscar Alessandro Garcia, and John Doe, a.k.a. Saul, a.k.a. Alex**, acting in concert with each other, on or about

and between October 31, 2018 and November 1, 2018, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 203

THE DEFENDANT(S) **ROBERTO GONZALEZ FRANCO AND JOHN DOE, A.K.A. SAUL, A.K.A. ALEX**, ACTING IN CONCERT WITH EACH OTHER, COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Roberto Gonzalez Franco and John Doe, a.k.a. Saul, a.k.a. Alex**, acting in concert with each other, **on or about November 4, 2018**, in Bronx County and elsewhere, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 204

THE DEFENDANT(S) **JOHN DOE, A.K.A. SAUL, A.K.A. ALEX** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **John Doe, a.k.a. Saul, a.k.a. Alex on or about and between November 4, 2018 and November 6, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 205

THE DEFENDANT(S) **OSCAR ALESSANDRO GARCIA AND JOHN DOE, A.K.A. SAUL, A.K.A. ALEX**, ACTING IN CONCERT WITH EACH OTHER, COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Oscar Alessandro Garcia and John Doe, a.k.a. Saul, a.k.a. Alex**, acting in concert with each other, **on or about February 3, 2019**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 206

THE DEFENDANT(S) **JOHN DOE, A.K.A. SAUL, A.K.A. ALEX** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE

THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **John Doe, a.k.a. Saul, a.k.a. Alex on or about February 4, 2019**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 207

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana on or about February 5, 2019**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 208

THE DEFENDANT(S) **ROBERTO GONZALEZ FRANCO** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.43(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Roberto Gonzalez Franco on or about February 7, 2018**, in Bronx County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin and said preparations, compounds, mixtures or substances are of an aggregate weight of two ounces or more.

COUNT: 209

THE DEFENDANT(S) **ROBERTO GONZALEZ FRANCO** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Roberto Gonzalez Franco on or about February 7, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 210

THE DEFENDANT(S) **JOHN DOE, A.K.A. SAUL, A.K.A. ALEX** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE

FIRST DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.43(1), COMMITTED AS FOLLOWS:

The Defendant(s) **John Doe, a.k.a. Saul, a.k.a. Alex** on or about **September 8, 2018**, in Bronx County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin and said preparations, compounds, mixtures or substances are of an aggregate weight of two ounces or more.

COUNT: 211

THE DEFENDANT(S) **JOHN DOE, A.K.A. SAUL, A.K.A. ALEX** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **John Doe, a.k.a. Saul, a.k.a. Alex** on or about **September 8, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 212

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA AND CHARLIE RODRIGUEZ**, ACTING IN CONCERT WITH EACH OTHER, COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.21(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana and Charlie Rodriguez**, acting in concert with each other, **on or about September 8, 2018**, in Bronx County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin and said preparations, compounds, mixtures or substances are of an aggregate weight of eight ounces or more.

COUNT: 213

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA AND CHARLIE RODRIGUEZ**, ACTING IN CONCERT WITH EACH OTHER, COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana and Charlie Rodriguez**, acting in concert with each other, **on or about September 8, 2018**, in Bronx County, did

knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 214

THE DEFENDANT(S) **JOHN DOE, A.K.A. SAUL, A.K.A. ALEX** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **John Doe, a.k.a. Saul, a.k.a. Alex** on or about **November 12, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 215

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana** on or about **November 12, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 216

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana** on or about **November 12, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 217

THE DEFENDANT(S) **JOHN DOE, A.K.A. SAUL, A.K.A. ALEX** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.43(1), COMMITTED AS FOLLOWS:

The Defendant(s) **John Doe, a.k.a. Saul, a.k.a. Alex** on or about **November 30, 2018**, in Bronx County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin and

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

COUNT: 218

THE DEFENDANT(S) **JOHN DOE, A.K.A. SAUL, A.K.A. ALEX** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **John Doe, a.k.a. Saul, a.k.a. Alex** on or about **November 30, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 219

THE DEFENDANT(S) **JOHN DOE, A.K.A. SAUL, A.K.A. ALEX** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.18(1), COMMITTED AS FOLLOWS:

The Defendant(s) **John Doe, a.k.a. Saul, a.k.a. Alex** on or about **November 30, 2018**, in Bronx County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin and said preparations, compounds, mixtures or substances are of an aggregate weight of four ounces or more.

COUNT: 220

THE DEFENDANT(S) **JOHN DOE, A.K.A. SAUL, A.K.A. ALEX** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **John Doe, a.k.a. Saul, a.k.a. Alex** on or about **November 30, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 221

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.18(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana on or about December 1, 2018**, in Bronx County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin and said preparations, compounds, mixtures or substances are of an aggregate weight of four ounces or more.

COUNT: 222

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana on or about December 1, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 223

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana on or about December 1, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 224

THE DEFENDANT(S) **JOHN DOE, A.K.A. SAUL, A.K.A. ALEX** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **John Doe, a.k.a. Saul, a.k.a. Alex on or about December 21, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 225

THE DEFENDANT(S) **JOHN DOE, A.K.A. SAUL, A.K.A. ALEX** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **John Doe, a.k.a. Saul, a.k.a. Alex** on or about **December 21, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 226

THE DEFENDANT(S) **JOHN DOE, A.K.A. SAUL, A.K.A. ALEX** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **John Doe, a.k.a. Saul, a.k.a. Alex** on or about **December 27, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 227

THE DEFENDANT(S) **JOHN DOE, A.K.A. SAUL, A.K.A. ALEX** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **John Doe, a.k.a. Saul, a.k.a. Alex** on or about **December 27, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 228

THE DEFENDANT(S) **JOHN DOE, A.K.A. SAUL, A.K.A. ALEX** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **John Doe, a.k.a. Saul, a.k.a. Alex** on or about **January 8, 2019**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 229

THE DEFENDANT(S) **JOHN DOE, A.K.A. SAUL, A.K.A. ALEX** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **John Doe, a.k.a. Saul, a.k.a. Alex** on or about **January 8, 2019**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 230

THE DEFENDANT(S) **JOHN DOE, A.K.A. SAUL, A.K.A. ALEX** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **John Doe, a.k.a. Saul, a.k.a. Alex** on or about **January 22, 2019**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 231

THE DEFENDANT(S) **JOHN DOE, A.K.A. SAUL, A.K.A. ALEX** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **John Doe, a.k.a. Saul, a.k.a. Alex** on or about **January 22, 2019**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 232

THE DEFENDANT(S) **JOHN DOE, A.K.A. SAUL, A.K.A. ALEX** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **John Doe, a.k.a. Saul, a.k.a. Alex** on or about **December 29, 2018**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 233

THE DEFENDANT(S) **JOHN DOE, A.K.A. SAUL, A.K.A. ALEX** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **John Doe, a.k.a. Saul, a.k.a. Alex** on or about **December 29, 2018**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 234

THE DEFENDANT(S) **JOHN DOE, A.K.A. SAUL, A.K.A. ALEX** COMMITTED THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.39(1), COMMITTED AS FOLLOWS:

The Defendant(s) **John Doe, a.k.a. Saul, a.k.a. Alex** on or about **January 23, 2019**, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

COUNT: 235

THE DEFENDANT(S) **JOHN DOE, A.K.A. SAUL, A.K.A. ALEX** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **John Doe, a.k.a. Saul, a.k.a. Alex** on or about **January 23, 2019**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT: 236

THE DEFENDANT(S) **CARLOS RODRIGUEZ SANTANA** COMMITTED THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, IN VIOLATION OF NEW YORK STATE PENAL LAW SECTION 220.16(1), COMMITTED AS FOLLOWS:

The Defendant(s) **Carlos Rodriguez Santana** on or about **January 23, 2019**, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

**GRAND JURY REPORT
COUNTY: BRONX**

GRAND JURY #: 43236/2017	
INDICTMENT#	FINDING: INDICTED
DEFENDANTS AND CORRESPONDING DOCKETS	
John Doe, a.k.a. Saul, a.k.a. Alex	IBNA
Carlos Rodriguez Santana	IBNA
Charlie Rodriguez	IBNA
Robert Goldberg	IBNA
Rafael Rodriguez	IBNA
Jose Jaquez	IBNA
Santiago Jose Martinez Sanchez, a.k.a. Eduito	IBNA
Silvia Vidal	IBNA
Roberto Gonzalez Franco	IBNA
Mario Alberto Urbina Garcia, a.k.a. Monstro	IBNA
Oscar Alessandro Garcia, a.k.a. Junior	IBNA

COUNTS (ordered by level of offense):

P.L. 220.77(1)	Operating as a Major Trafficker (1 Count)
P.L. 220.77(3)	Operating as a Major Trafficker (3 Counts)
P.L. 220.77(2)	Operating as a Major Trafficker (1 Count)
P.L. 220.43(1)	Criminal Sale of a Controlled Substance in the First Degree (7 Counts)
P.L. 220.21(1)	Criminal Possession of a Controlled Substance in the First Degree (7 Counts)
P.L. 220.41(1)	Criminal Sale of a Controlled Substance in the Second Degree (4 Counts)
P.L. 220.18(1)	Criminal Possession of a Controlled Substance in the Second Degree (6 Counts)
P.L. 105.15	Conspiracy in the Second Degree (1 Count)
P.L. 220.39(1)	Criminal Sale of a Controlled Substance in the Third Degree (76 Counts)
P.L. 220.16(1)	Criminal Possession of a Controlled Substance in the Third Degree (117 Counts)
P.L. 220.16(12)	Criminal Possession of a Controlled Substance in the Third Degree (4 Counts)
P.L. 220.09(1)	Criminal Possession of a Controlled Substance in the Fourth Degree (7 Counts)
P.L. 105.10(1)	Conspiracy in the Fourth Degree (2 Counts)

SCHEDULED ARRAIGNMENT DATE:

ARRAIGNMENT PART:

OTHER ASSOCIATED INDICTMENTS:

DATE COMPLETED: 05/22/2019

ADA: EDWARD O. SICLARI &
JEFFREY KIOK

BUREAU: SIB