

INDICTMENT

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

THE PEOPLE OF THE STATE OF NEW YORK

AGAINST

X. MICHAEL DONOVAN  
DEFENDANT

X. ROBERT OTTOFARO  
DEFENDANT

X. ANTHONY DONOFRIO  
DEFENDANT

X. ANTONIO DEANGELIS  
DEFENDANT

X. MOHAMMED FARRAJ  
DEFENDANT

INDICTMENT NO. 1703/2012  
  
NON-ALIGNED  
  
MAJOR NARCOTICS  
INVESTIGATIONS BUREAU

COUNTS

- CONSPIRACY IN THE SECOND DEGREE (1 COUNT)
- CONSPIRACY IN THE FOURTH DEGREE (1 COUNT)
- CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE (3 COUNTS)
- CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE (19 COUNTS)
- CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE (19 COUNTS)
- CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SEVENTH DEGREE (5 COUNTS)
- CRIMINAL SALE OF MARIHUANA IN THE THIRD DEGREE (1 COUNT)
- CRIMINAL POSSESSION OF MARIHUANA IN THE FIFTH DEGREE (1 COUNT)

A TRUE BILL

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FOREPERSON

CHARLES J. HYNES  
DISTRICT ATTORNEY

## FIRST COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANTS, MICHAEL DONOVAN, ROBERT OTTOFARO, ANTHONY DONOFRIO, ANTONIO DEANGELIS, AND MOHAMMED FARRAJ OF THE CRIME OF CONSPIRACY IN THE SECOND DEGREE [P.L. 105.15] COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT AND BETWEEN DECEMBER 7, 2011 AND MAY 30, 2012, IN THE COUNTY OF KINGS, WITH INTENT THAT CONDUCT CONSTITUTING A CLASS "A" FELONY BE PERFORMED, NAMELY: CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, AGREED WITH ONE OR MORE PERSONS TO ENGAGE IN OR CAUSE THE PERFORMANCE OF SUCH CONDUCT;

AND IN FURTHERANCE OF THIS CONSPIRACY AND IN ORDER TO EFFECT THE OBJECT THEREOF, THE FOLLOWING OVERT ACTS, AMONG OTHERS, WERE DONE AND PERFORMED BY CERTAIN OF THE PARTIES TO THIS UNLAWFUL CONSPIRACY, TO WIT:

1. THE DEFENDANT, ANTHONY DONOFRIO, ON OR ABOUT DECEMBER 7, 2011, IN THE COUNTY OF KINGS CITY AND STATE OF NEW YORK, KNOWINGLY AND UNLAWFULLY HANDED A NARCOTIC DRUG, NAMELY COCAINE, TO A PERSON KNOWN TO THE GRAND JURY IN EXCHANGE FOR QUANTITY OF UNITED STATES CURRENCY.
2. THE DEFENDANT, ANTHONY DONOFRIO, ON OR ABOUT DECEMBER 7, 2011, IN THE COUNTY OF KINGS CITY AND STATE OF NEW YORK, DID DIRECT A PERSON KNOWN TO THE GRAND JURY, TO MICHAEL DONOVAN, AND DID PROVIDE THE PHONE NUMBER FOR MICHAEL DONOVAN, FOR A FUTURE SALE OF A NARCOTIC DRUG, NAMELY OXYCODONE.
3. THE DEFENDANT, MICHAEL DONOVAN, ON OR ABOUT DECEMBER 9, 2011, IN THE COUNTY OF KINGS CITY AND STATE OF NEW YORK, KNOWINGLY AND UNLAWFULLY HANDED A NARCOTIC DRUG, NAMELY

OXYCODONE, TO A PERSON KNOWN TO THE GRAND JURY IN EXCHANGE FOR A QUANTITY OF UNITED STATES CURRENCY.

4. THE DEFENDANT, MICHAEL DONOVAN, ON OR ABOUT JANUARY 20, 2012, IN THE COUNTY OF KINGS CITY AND STATE OF NEW YORK, DID DIRECT A PERSON KNOWN TO THE GRAND JURY TO ROBERT OTTOFARO, AND DID PROVIDE THE PHONE NUMBER FOR ROBERT OTTOFARO, FOR A SALE OF A NARCOTIC DRUG, NAMELY OXYCODONE.
5. THE DEFENDANT, ROBERT OTTOFARO, ON OR ABOUT JANUARY 20, 2012, IN THE COUNTY OF KINGS CITY AND STATE OF NEW YORK, KNOWINGLY AND UNLAWFULLY HANDED A NARCOTIC DRUG, NAMELY OXYCODONE, TO A PERSON KNOWN TO THE GRAND JURY IN EXCHANGE FOR A QUANTITY OF UNITED STATES CURRENCY.
6. THE DEFENDANT MICHAEL DONOVAN, ON OR ABOUT FEBRUARY 23, 2012, IN COUNTY OF KINGS CITY AND STATE OF NEW YORK, DID DIRECT A PERSON KNOWN TO THE GRAND JURY TO ANTHONY DEANGELIS FOR A SALE OF A NARCOTIC DRUG, NAMELY OXYCODONE.
7. THE DEFENDANT ANTHONY DEANGELIS, ON OR ABOUT FEBRUARY 23, 2012, IN COUNTY OF KINGS CITY AND STATE OF NEW YORK, DID DIRECT A PERSON KNOWN TO THE GRAND JURY TO MOHAMMED FARRAJ FOR A SALE OF A NARCOTIC DRUG, NAMELY OXYCODONE.
8. THE DEFENDANT, MOHAMMED FARRAJ, ON OR ABOUT FEBRUARY 23, 2012, IN THE COUNTY OF KINGS CITY AND STATE OF NEW YORK, KNOWINGLY AND UNLAWFULLY HANDED A NARCOTIC DRUG, NAMELY OXYCODONE, TO A PERSON KNOWN TO THE GRAND JURY IN EXCHANGE FOR A QUANTITY OF UNITED STATES CURRENCY.
9. THE DEFENDANT, MICHAEL DONOVAN, ON OR ABOUT MARCH 14, 2012, IN THE COUNTY OF KINGS CITY AND STATE OF NEW YORK, DID DIRECT A PERSON KNOWN TO THE GRAND JURY TO ANTONIO DEANGELIS FOR THE SALE OF A NARCOTIC DRUG, NAMELY OXYCODONE.

10. THE DEFENDANT, ANTONIO DEANGELIS, ON OR ABOUT MARCH 14, 2012, IN THE COUNTY OF KINGS CITY AND STATE OF NEW YORK, KNOWINGLY AND UNLAWFULLY HANDED A NARCOTIC DRUG, NAMELY OXYCODONE, TO A PERSON KNOWN TO THE GRAND JURY IN EXCHANGE FOR A QUANTITY OF UNITED STATES CURRENCY, AND SAID NARCOTIC DRUG WEIGHED IN EXCESS OF ONE HALF AN OUNCE (AN A FELONY).

11. THE DEFENDANT, MICHAEL DONOVAN, ON OR ABOUT MAY 25, 2012, IN THE COUNTY OF KINGS, CITY AND STATE OF NEW YORK, DID ENGAGE IN A NARCOTICS RELATED CONVERSATION WITH A PERSON KNOWN TO THE GRAND JURY, AND NEGOTIATED THE SALE OF 180 OXYCODONE PILLS.

12. THE DEFENDANT, ANTONIO DEANGELIS, ON OR ABOUT MAY 30, 2012, IN THE COUNTY OF KINGS, CITY AND STATE OF NEW YORK, DID KNOWINGLY AND UNLAWFULLY HAND A NARCOTIC DRUG, NAMELY OXYCODONE, TO A PERSON KNOWN TO THE GRAND JURY IN EXCHANGE FOR A QUANTITY OF UNITED STATES CURRENCY.

#### SECOND COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANTS, MICHAEL DONOVAN, ROBERT OTTOFARO, ANTHONY DONOFRIO, ANTONIO DEANGELIS, AND MOHAMMED FARRAJ OF THE CRIME OF CONSPIRACY IN THE FOURTH DEGREE [P.L. 105.10-1] COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT AND BETWEEN DECEMBER 7, 2011 AND MAY 30, 2012, IN THE COUNTY OF KINGS, WITH INTENT THAT CONDUCT CONSTITUTING A CLASS "B" FELONY BE PERFORMED, NAMELY: 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;

AND IN FURTHERANCE OF THIS CONSPIRACY AND IN ORDER TO EFFECT THE OBJECT THEREOF, THE FOLLOWING OVERT ACTS, AMONG OTHERS, WERE DONE AND PERFORMED BY CERTAIN OF THE PARTIES TO THIS UNLAWFUL CONSPIRACY, TO WIT:

ALL THE ACTS OUTLINED ABOVE IN COUNT ONE, PARAGRAPHS 1-12 .

#### THIRD COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANT, ANTHONY DONOFRIO, OF THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L. 220.39] COMMITTED AS FOLLOWS:

THE DEFENDANT, ON DECEMBER 7, 2011, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY SOLD A NARCOTIC DRUG: NAMELY COCAINE TO A PERSON KNOWN TO THE GRAND JURY.

#### FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANT, ANTHONY DONOFRIO, OF THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L. 220.16-1] COMMITTED AS FOLLOWS:

THE DEFENDANT, ON DECEMBER 7, 2011, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY POSSESSED A NARCOTIC DRUG, NAMELY: COCAINE, WITH INTENT TO SELL IT.

#### FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANT, ANTHONY DONOFRIO, OF THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SEVENTH DEGREE [P.L. 220.03] COMMITTED AS FOLLOWS:

THE DEFENDANT, ON DECEMBER 7, 2011, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY POSSESSED A CONTROLLED SUBSTANCE, NAMELY: COCAINE.

#### SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANT, MICHAEL DONOVAN, OF THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L. 220.39] COMMITTED AS FOLLOWS:

THE DEFENDANT ON DECEMBER 9, 2011, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY SOLD A NARCOTIC DRUG: NAMELY OXYCODONE TO A PERSON KNOWN TO THE GRAND JURY.

#### SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANT, MICHAEL DONOVAN, OF THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L. 220.16-1] COMMITTED AS FOLLOWS:

THE DEFENDANT, ON DECEMBER 9, 2011, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY POSSESSED A NARCOTIC DRUG, NAMELY: OXYCODONE, WITH INTENT TO SELL IT.

#### EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANT, MICHAEL DONOVAN, OF THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SEVENTH DEGREE [P.L. 220.03] COMMITTED AS FOLLOWS:

THE DEFENDANT, ON DECEMBER 9, 2011, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY POSSESSED A CONTROLLED SUBSTANCE, NAMELY: OXYCODONE.

#### NINTH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANT, ROBERT OTTOFARO, OF THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L. 220.39] COMMITTED AS FOLLOWS:

THE DEFENDANT ON JANUARY 20, 2012, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY SOLD A NARCOTIC DRUG: NAMELY OXYCODONE TO A PERSON KNOWN TO THE GRAND JURY.

#### TENTH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANT, ROBERT OTTOFARO, OF THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L. 220.39] COMMITTED AS FOLLOWS:

THE DEFENDANT ON JANUARY 20, 2012, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY SOLD A NARCOTIC DRUG: NAMELY OXYCODONE TO A PERSON KNOWN TO THE GRAND JURY.

**THE SUBJECT MATTER OF THIS COUNT BEING DIFFERENT FROM THAT SET FORTH IN THE NINTH COUNT.**

#### ELEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANT, ROBERT OTTOFARO, OF THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L. 220.16-1] COMMITTED AS FOLLOWS:

THE DEFENDANT, ON JANUARY 20, 2012, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY POSSESSED A NARCOTIC DRUG, NAMELY: OXYCODONE, WITH INTENT TO SELL IT.

#### TWELFTH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANT, ROBERT OTTOFARO, OF THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L. 220.16-1] COMMITTED AS FOLLOWS:

THE DEFENDANT, ON JANUARY 20, 2012, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY POSSESSED A NARCOTIC DRUG, NAMELY: OXYCODONE, WITH INTENT TO SELL IT.

**THE SUBJECT MATTER OF THIS COUNT BEING DIFFERENT FROM THAT SET FORTH IN THE ELEVENTH COUNT.**

#### THIRTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANT, ROBERT OTTOFARO, OF THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SEVENTH DEGREE [P.L. 220.03] COMMITTED AS FOLLOWS:

THE DEFENDANT, ON JANUARY 20, 2012, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY POSSESSED A CONTROLLED SUBSTANCE, NAMELY: OXYCODONE.

#### FOURTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANT, ROBERT OTTOFARO, OF THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L. 220.39] COMMITTED AS FOLLOWS:

THE DEFENDANT ON JANUARY 23, 2012, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY SOLD A NARCOTIC DRUG: NAMELY OXYCODONE TO A PERSON KNOWN TO THE GRAND JURY.



#### FIFTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANT, ROBERT OTTOFARO, OF THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L. 220.39] COMMITTED AS FOLLOWS:

THE DEFENDANT ON JANUARY 23, 2012, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY SOLD A NARCOTIC DRUG: NAMELY COCAINE TO A PERSON KNOWN TO THE GRAND JURY.

#### SIXTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANT, ROBERT OTTOFARO, OF THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L. 220.16-1] COMMITTED AS FOLLOWS:

THE DEFENDANT, ON JANUARY 23, 2012, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY POSSESSED A NARCOTIC DRUG, NAMELY: OXYCODONE, WITH INTENT TO SELL IT.

#### SEVENTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANT, ROBERT OTTOFARO, OF THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L. 220.16-1] COMMITTED AS FOLLOWS:

THE DEFENDANT, ON JANUARY 23, 2012, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY POSSESSED A NARCOTIC DRUG, NAMELY: COCAINE, WITH INTENT TO SELL IT.

#### EIGHTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANT, ROBERT OTTOFARO, OF THE CRIME OF CRIMINAL

SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L. 220.39]  
COMMITTED AS FOLLOWS:

THE DEFENDANT ON JANUARY 25, 2012, IN THE COUNTY OF KINGS,  
KNOWINGLY AND UNLAWFULLY SOLD A NARCOTIC DRUG: NAMELY  
OXYCODONE TO A PERSON KNOWN TO THE GRAND JURY.

#### NINETEENTH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANT, ROBERT OTTOFARO, OF THE CRIME OF CRIMINAL  
POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L.  
220.16-1] COMMITTED AS FOLLOWS:

THE DEFENDANT, ON JANUARY 25, 2012, IN THE COUNTY OF KINGS,  
KNOWINGLY AND UNLAWFULLY POSSESSED A NARCOTIC DRUG, NAMELY:  
OXYCODONE, WITH INTENT TO SELL IT.

#### TWENTIETH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS, MICHAEL DONOVAN, ANTONIO DEANGELIS, AND  
MOHAMMED FARRAJ OF THE CRIME OF CRIMINAL SALE OF A CONTROLLED  
SUBSTANCE IN THE THIRD DEGREE [P.L. 220.39] COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH ACTING IN CONCERT WITH EACH OTHER, ON  
FEBRUARY 13, 2012, IN THE COUNTY OF KINGS, KNOWINGLY AND  
UNLAWFULLY SOLD A NARCOTIC DRUG: NAMELY OXYCODONE TO A PERSON  
KNOWN TO THE GRAND JURY.

#### TWENTY-FIRST COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANT, MOHAMMED FARRAJ, OF THE CRIME OF CRIMINAL  
POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L.  
220.16-1] COMMITTED AS FOLLOWS:

THE DEFENDANT, ON FEBRUARY 13, 2012, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY POSSESSED A NARCOTIC DRUG, NAMELY: OXYCODONE, WITH INTENT TO SELL IT.

#### TWENTY-SECOND COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANT, MOHAMMED FARRAJ, OF THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SEVENTH DEGREE [P.L. 220.03] COMMITTED AS FOLLOWS:

THE DEFENDANT, ON FEBRUARY 13, 2012, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY POSSESSED A CONTROLLED SUBSTANCE, NAMELY: OXYCODONE.

#### TWENTY-THIRD COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANTS, ANTONIO DEANGELIS AND MOHAMMED FARRAJ OF THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L. 220.39] COMMITTED AS FOLLOWS:

THE DEFENDANTS, WHILE ACTING IN CONCERT WITH EACH OTHER, ON FEBRUARY 15, 2012, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY SOLD A NARCOTIC DRUG: NAMELY OXYCODONE TO A PERSON KNOWN TO THE GRAND JURY.

#### TWENTY-FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANT, MOHAMMED FARRAJ, OF THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L. 220.16-1] COMMITTED AS FOLLOWS:

THE DEFENDANT, ON FEBRUARY 15, 2012, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY POSSESSED A NARCOTIC DRUG, NAMELY: OXYCODONE, WITH INTENT TO SELL IT.

TWENTY-FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANT, ANTONIO DEANGELIS, OF THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L. 220.39] COMMITTED AS FOLLOWS:

THE DEFENDANTS ON FEBRUARY 21, 2012, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY SOLD A NARCOTIC DRUG: NAMELY OXYCODONE TO A PERSON KNOWN TO THE GRAND JURY.

TWENTY-SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANT, ANTONIO DEANGELIS, OF THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L. 220.16-1] COMMITTED AS FOLLOWS:

THE DEFENDANT, ON FEBRUARY 21, 2012, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY POSSESSED A NARCOTIC DRUG, NAMELY: OXYCODONE, WITH INTENT TO SELL IT.

TWENTY-SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANT, ANTONIO DEANGELIS, OF THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SEVENTH DEGREE [P.L. 220.03] COMMITTED AS FOLLOWS:

THE DEFENDANT, ON FEBRUARY 21, 2012, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY POSSESSED A CONTROLLED SUBSTANCE, NAMELY: OXYCODONE.

TWENTY-EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANT, ANTONIO DEANGELIS, OF THE CRIME OF

CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L. 220.39] COMMITTED AS FOLLOWS:

THE DEFENDANTS ON FEBRUARY 27, 2012, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY SOLD A NARCOTIC DRUG: NAMELY OXYCODONE TO A PERSON KNOWN TO THE GRAND JURY.

#### TWENTY-NINTH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANT, ANTONIO DEANGELIS, OF THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L. 220.16-1] COMMITTED AS FOLLOWS:

THE DEFENDANT, ON FEBRUARY 27, 2012, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY POSSESSED A NARCOTIC DRUG, NAMELY: OXYCODONE, WITH INTENT TO SELL IT.

#### THIRTIETH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANT, ANTONIO DEANGELIS, OF THE CRIME OF CRIMINAL SALE OF MARIHUANA IN THE THIRD DEGREE [P.L. 221.45] COMMITTED AS FOLLOWS:

THE DEFENDANT, ON MARCH 1, 2012, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY SOLD MARIHUANA AND SAID MARIHUANA WAS AN AGGREGATE WEIGHT OF MORE THAN TWENTY-FIVE GRAMS.

#### THIRTY-FIRST COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANT, ANTONIO DEANGELIS, OF THE CRIME OF CRIMINAL POSSESSION OF MARIHUANA IN THE FIFTH DEGREE [P.L. 221.10-2] COMMITTED AS FOLLOWS:

THE DEFENDANT ON MARCH 1, 2012, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY POSSESSED MARIHUANA, AND SAID

MARIHUANA WAS AN AGGREGATE WEIGHT OF MORE THAN TWENTY FIVE GRAMS.

#### THIRTY-SECOND COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANT, ANTONIO DEANGELIS, OF THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L. 220.39] COMMITTED AS FOLLOWS:

THE DEFENDANT ON MARCH 13, 2012, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY SOLD A NARCOTIC DRUG: NAMELY OXYCODONE TO A PERSON KNOWN TO THE GRAND JURY TO A PERSON KNOWN TO THE GRAND JURY.

#### THIRTY-THIRD COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANT, ANTONIO DEANGELIS, OF THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L. 220.16-1] COMMITTED AS FOLLOWS:

THE DEFENDANT, ON MARCH 13, 2012, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY POSSESSED A NARCOTIC DRUG, NAMELY: OXYCODONE, WITH INTENT TO SELL IT.

#### THIRTY-FORTH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANTS, MICHAEL DONOVAN AND ANTONIO DEANGELIS, OF THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE [P.L. 220.41-1] COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH ACTING IN CONCERT WITH EACH OTHER, ON MARCH 14, 2012, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY SOLD ONE OR MORE PREPARATIONS, COMPOUNDS, MIXTURES, OR SUBSTANCES CONTAINING A NARCOTIC DRUG, NAMELY: OXYCODONE, AND

SAID PREPARATIONS, COMPOUNDS, MIXTURES, OR SUBSTANCES WERE OF AN AGGREGATE WEIGHT OF ONE-HALF OUNCE OR MORE TO A PERSON KNOWN TO THE GRAND JURY.

#### THIRTY-FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANTS, MICHAEL DONOVAN AND ANTONIO DEANGELIS, OF THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L. 220.39] COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH ACTING IN CONCERT WITH EACH OTHER, ON MARCH 14, 2012, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY SOLD A NARCOTIC DRUG: NAMELY OXYCODONE TO A PERSON KNOWN TO THE GRAND JURY.

#### THIRTY-SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANT, ANTONIO DEANGELIS, OF THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L. 220.16-1] COMMITTED AS FOLLOWS:

THE DEFENDANT, ON MARCH 14, 2012, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY POSSESSED A NARCOTIC DRUG, NAMELY: OXYCODONE, WITH INTENT TO SELL IT.

#### THIRTY-SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANT, ANTONIO DEANGELIS, OF THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L. 220.39] COMMITTED AS FOLLOWS:

THE DEFENDANT ON MARCH 20, 2012, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY SOLD A NARCOTIC DRUG: NAMELY OXYCODONE TO A PERSON KNOWN TO THE GRAND JURY.

#### THIRTY-EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANT, ANTONIO DEANGELIS, OF THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L. 220.16-1] COMMITTED AS FOLLOWS:

THE DEFENDANT, ON MARCH 20, 2012, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY POSSESSED A NARCOTIC DRUG, NAMELY: OXYCODONE, WITH INTENT TO SELL IT.

#### THIRTY-NINTH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANT, MOHAMMED FARRAJ, OF THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L. 220.39] COMMITTED AS FOLLOWS:

THE DEFENDANT ON APRIL 18, 2012, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY SOLD A NARCOTIC DRUG: NAMELY OXYCODONE TO A PERSON KNOWN TO THE GRAND JURY.

#### FORTIETH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANT, MOHAMMED FARRAJ, OF THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L. 220.16-1] COMMITTED AS FOLLOWS:

THE DEFENDANT, ON APRIL 18, 2012, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY POSSESSED A NARCOTIC DRUG, NAMELY: OXYCODONE, WITH INTENT TO SELL IT.

#### FORTY-FIRST COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANT, MOHAMMED FARRAJ, OF THE CRIME OF CRIMINAL



SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L. 220.39]  
COMMITTED AS FOLLOWS:

THE DEFENDANT ON MAY 9, 2012, IN THE COUNTY OF KINGS,  
KNOWINGLY AND UNLAWFULLY SOLD A NARCOTIC DRUG: NAMELY  
OXYCODONE TO A PERSON KNOWN TO THE GRAND JURY.

#### FORTY-SECOND COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANT, MOHAMMED FARRAJ, OF THE CRIME OF CRIMINAL  
POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L.  
220.16-1] COMMITTED AS FOLLOWS:

THE DEFENDANT, ON MAY 9, 2012, IN THE COUNTY OF KINGS,  
KNOWINGLY AND UNLAWFULLY POSSESSED A NARCOTIC DRUG, NAMELY:  
OXYCODONE, WITH INTENT TO SELL IT.

#### FORTY-THIRD COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANT, MOHAMMED FARRAJ, OF THE CRIME OF CRIMINAL  
SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE [P.L. 220.41-1]  
COMMITTED AS FOLLOWS:

THE DEFENDANT, ON MAY 15, 2012, IN THE COUNTY OF KINGS,  
KNOWINGLY AND UNLAWFULLY SOLD ONE OR MORE PREPARATIONS,  
COMPOUNDS, MIXTURES, OR SUBSTANCES CONTAINING A NARCOTIC DRUG,  
NAMELY: OXYCODONE, AND SAID PREPARATIONS, COMPOUNDS, MIXTURES,  
OR SUBSTANCES WERE OF AN AGGREGATE WEIGHT OF ONE-HALF OUNCE OR  
MORE TO A PERSON KNOWN TO THE GRAND JURY.

#### FORTY-FORTH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANT, MOHAMMED FARRAJ, OF THE CRIME OF CRIMINAL

SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L. 220.39]  
COMMITTED AS FOLLOWS:

THE DEFENDANT ON MAY 15, 2012, IN THE COUNTY OF KINGS,  
KNOWINGLY AND UNLAWFULLY SOLD A NARCOTIC DRUG: NAMELY  
OXYCODONE TO A PERSON KNOWN TO THE GRAND JURY.

#### FORTY-FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANT, MOHAMMED FARRAJ, OF THE CRIME OF CRIMINAL  
POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L.  
220.16-1] COMMITTED AS FOLLOWS:

THE DEFENDANT, ON MAY 15, 2012, IN THE COUNTY OF KINGS,  
KNOWINGLY AND UNLAWFULLY POSSESSED A NARCOTIC DRUG, NAMELY:  
OXYCODONE, WITH INTENT TO SELL IT.

#### FORTY-SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANT, MOHAMMED FARRAJ, OF THE CRIME OF CRIMINAL  
SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L. 220.39]  
COMMITTED AS FOLLOWS:

THE DEFENDANT ON MAY 23, 2012, IN THE COUNTY OF KINGS,  
KNOWINGLY AND UNLAWFULLY SOLD A NARCOTIC DRUG: NAMELY  
OXYCODONE TO A PERSON KNOWN TO THE GRAND JURY.

#### FORTY-SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANT, MOHAMMED FARRAJ, OF THE CRIME OF CRIMINAL  
POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L.  
220.16-1] COMMITTED AS FOLLOWS:

THE DEFENDANT, ON MAY 23, 2012, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY POSSESSED A NARCOTIC DRUG, NAMELY: OXYCODONE, WITH INTENT TO SELL IT.

#### FORTY-EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANTS, MICHAEL DONOVAN AND ANTONIO DEANGELIS, OF THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE [P.L. 220.41-1] COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH ACTING IN CONCERT WITH EACH OTHER, ON MAY 30, 2012, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY OFFERED TO SELL ONE OR MORE PREPARATIONS, COMPOUNDS, MIXTURES, OR SUBSTANCES CONTAINING A NARCOTIC DRUG, NAMELY: OXYCODONE, AND SAID PREPARATIONS, COMPOUNDS, MIXTURES, OR SUBSTANCES WERE OF AN AGGREGATE WEIGHT OF ONE-HALF OUNCE OR MORE TO A PERSON KNOWN TO THE GRAND JURY.

#### FORTY-NINTH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANTS, MICHAEL DONOVAN AND ANTONIO DEANGELIS, WHILE ACTING IN CONCERT WITH EACH OTHER, OF THE CRIME OF CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L. 220.39] COMMITTED AS FOLLOWS:

THE DEFENDANTS ON MAY 30, 2012, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY SOLD A NARCOTIC DRUG: NAMELY OXYCODONE TO A PERSON KNOWN TO THE GRAND JURY.

FIFTIETH COUNT

THE GRAND JURY OF THE COUNTY OF KINGS BY THIS INDICTMENT, ACCUSES THE DEFENDANT, ANTONIO DEANGELIS, OF THE CRIME OF CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [P.L. 220.16-1] COMMITTED AS FOLLOWS:

THE DEFENDANT, ON MAY 30, 2012, IN THE COUNTY OF KINGS, KNOWINGLY AND UNLAWFULLY POSSESSED A NARCOTIC DRUG, NAMELY: OXYCODONE, WITH INTENT TO SELL IT.

CHARLES J. HYNES  
DISTRICT ATTORNEY