

Approved: 
NOAH SOLOWIEJCZYK
Assistant United States Attorney

Before: THE HONORABLE FRANK MAAS
United States Magistrate Judge
Southern District of New York

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UNITED STATES OF AMERICA :
: SEALED COMPLAINT
:
- v. - : Violation of
: 21 U.S.C. § 846
:
RICHARD GALIMI, :
: COUNTY OF OFFENSE:
: MANHATTAN
Defendant. :
:
- - - - - X

SOUTHERN DISTRICT OF NEW YORK, ss.:

DERWIN D. KINSTON, being duly sworn, deposes and says that he is a Special Agent with the Drug Enforcement Administration ("DEA") and charges as follows:

COUNT ONE

1. From at least in or about 2011, up to and including in or about November 2015, in the Southern District of New York and elsewhere, RICHARD GALIMI, the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that RICHARD GALIMI, the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances involved in the offense were (i) a detectable amount of alpha-Pyrrolidinopentiophenone, otherwise known as alpha-pyrrolidinovalerophenone ("Alpha-PVP"),

which is a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C); (ii) a detectable amount of N-(1-amino-3-methyl-1-oxobutan-2-yl)-1-(cyclohexylmethyl)-1H-indazole-3-carboxamide ("AB-CHMINACA"), which is a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C); and (iii) a detectable amount of N-(1-amino-3-methyl-1-oxobutan-2-yl)-1-pentyl-1H-indazole-3-carboxamide ("AB-PINACA"), which is a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

The bases for my knowledge of the foregoing charge are, in part, as follows:

4. I have been with the DEA for approximately twenty-five years. I have been personally involved in the investigation of this matter. This affidavit is based upon my conversations with law enforcement agents and others, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

5. Based on my training, experience, participation in this investigation, and my discussions with DEA chemists, I have learned the following:

a. "Spice" is a street name applied to a synthetic cannabinoid, in green leafy form, that is intended to mimic the effects of marijuana. Historically, the stimulant effects of Spice were provided by a substance known as JWH-018, among other substances. In or about November 2010, JWH-018 and several other related substances were classified as Schedule I controlled substances. After that point, Spice frequently contained other synthetic cannabinoids, such as AB-CHMINACA and AB-PINACA. Spice is frequently sold to consumers in small packets that purport to contain incense and that feature a disclaimer that the incense should not be consumed by humans.

b. "Flakka" is the street name applied to a synthetic cathinone, that is intended to mimic the effects of an amphetamine. Flakka can come in a rocky crystalline form and often comes in capsules. Flakka typically contains Alpha-PVP,

and is a derivative of the synthetic drug commonly known as "bath salts." Historically, the stimulant effect of bath salts was provided by methylenedioxypyrovalerone ("MDPV"), among other substances. Subsequent to the classification of MDPV as a Schedule I controlled substance in or about September 2011, bath salts frequently contain Alpha-PVP, which has a similar stimulant effect and is considered a controlled substance analogue to MDPV. Alpha-PVP was classified as a Schedule I controlled substance on or about March 7, 2014. Flakka is frequently sold to consumers in small packets.

GALIMI'S SALES OF SPICE

6. Based on my conversations with a cooperating source assisting the DEA ("CS-1")¹, I have learned, among other things, the following:

a. In or about 2011, CS-1 was operating a smoke shop located in New Jersey and received an unsolicited telephone call from RICHARD GALIMI, the defendant. During the telephone call, GALIMI offered to provide CS-1 with a powerful chemical spice known as "Hydro." CS-1 began purchasing packets of Hydro from GALIMI and sold these packets to customers at his smoke shop for a profit.

b. In or about 2011, GALIMI asked CS-1 to pick up Damiana leaves from a warehouse located in New Jersey and to transport these Damiana leaves to GALIMI in Brooklyn. CS-1 went to the location in New Jersey provided by GALIMI, and obtained the Damiana leaves from another individual not named herein ("CC-1"). CS-1 then brought the Damiana leaves to GALIMI in Brooklyn, New York. In exchange for transporting the Damiana leaves to GALIMI, GALIMI allowed CS-1 to purchase Hydro at a discount from him.

c. Based on my training and experience and my participation in this investigation, I know that in order to create Spice, lab-synthesized chemicals, such as AB-CHMINACA and

¹CS-1 was charged with federal narcotics crimes in or about 2013. CS-1 is providing information to law enforcement in the hopes of entering into a cooperation agreement with the Government and obtaining lenient treatment at sentencing. Information provided by CS-1 has proven reliable in the past and has been corroborated by, among other things, surveillance by law enforcement.

AB-PINACA, are mixed with other non-controlled substances, such as acetone or flavoring additives, and then sprayed onto leafy materials, including Damiana leaves.

7. Based on my conversations and instructions to CS-1, as well as my surveillance of meetings attended by CS-1, my review of recordings made by CS-1, and my discussions with DEA chemists, I have learned, among other things, the following:

a. On or about January 23, 2015, CS-1, at the direction of the DEA, contacted RICHARD GALIMI, the defendant, by telephone, which conversation was recorded. CS-1 was located in Manhattan, New York at the time CS-1 placed the telephone call to GALIMI. During the telephone conversation, GALIMI and CS-1 discussed, in substance and in part, meeting later that day so that CS-1 could purchase quantities of Spice from GALIMI. On or about January 23, 2015, CS-1 met with GALIMI inside of a warehouse located on Cropsey Avenue in Brooklyn, New York ("Warehouse-1"). During the meeting, CS-1, using currency that had been provided by the DEA prior to the meeting, purchased packets of suspected synthetic cannabinoids, i.e. Spice, from GALIMI.

b. On or about February 24, 2015, at the direction of the DEA, CS-1 met with GALIMI inside of Warehouse-1 and, using currency that had been provided by the DEA prior to the meeting, purchased \$2,000 worth of packets of suspected synthetic cannabinoids, i.e. Spice, from GALIMI.

c. Based on my debriefing of CS-1, I have learned that, prior to the February 24, 2015 meeting, CS-1 advised GALIMI, in substance and in part, that GALIMI should make the product CS-1 was purchasing "strong." During the meeting inside of Warehouse-1, CS-1 observed approximately three men and two women scooping suspected chemical spice from a large plastic container, placing this suspected chemical spice into packets, and then sealing the packets. CS-1 further advised me that, during the meeting inside of Warehouse-1, CS-1 stated to GALIMI, in substance and in part, that he was getting customers lined up to purchase Spice at a location in Manhattan, New York, and that CS-1 wanted the Spice he was purchasing from GALIMI to be strong to ensure that customers continued to come back to CS-1. Later during the meeting, GALIMI provided CS-1 with samples of a synthetic cannabinoid with the brand name "Jeffrey," that GALIMI stated was three times stronger than typical Spice. CS-1 also asked GALIMI whether GALIMI could send people who worked for GALIMI to make deliveries of Spice to Manhattan. GALIMI stated in response that this was possible. GALIMI further

indicated to CS-1, in substance and in part, that the men who were working for GALIMI inside of Warehouse-1 could be trusted.

d. Directly following the February 24, 2015 meeting with GALIMI, CS-1 provided me with the packets he had purchased from GALIMI. Based on my discussions with a DEA chemist, as well as my review of reports prepared by a DEA laboratory, I have learned that substances CS-1 purchased from GALIMI on or about February 24, 2015 tested positive for the presence of AB-CHMINACA. Based on my conversations with a DEA chemist, I have learned that AB-CHMINACA was classified as a Schedule I controlled substance on or about January 30, 2015. Furthermore, I have learned that the five sample packets of suspected synthetic cannabinoids provided by GALIMI to CS-1 on or about February 24, 2015, tested positive for the presence of AB-PINACA. Based on my conversations with a DEA chemist, I have learned that AB-PINACA was classified as a Schedule I controlled substance on or about January 30, 2015.

GALIMI'S SALES OF FLAKKA

8. On or about September 15, 2015, at the direction of the DEA, CS-1 placed a telephone call to RICHARD GALIMI, the defendant, which telephone call was recorded. Based on my debriefing of CS-1 following the telephone call, I have learned, among other things, the following:

a. During the telephone call, CS-1 informed GALIMI, in substance and in part, that CS-1 had identified a potential buyer that could purchase synthetic controlled substances from GALIMI.

b. GALIMI and CS-1 agreed, in sum and substance, that GALIMI, CS-1, and the potential buyer would meet in order to discuss the potential synthetic controlled substance transaction further. CS-1 and GALIMI agreed to meet the next day at a restaurant located on Emmons Avenue in Brooklyn, New York ("Restaurant-1").

9. On or about September 16, 2015, at the direction of the DEA, CS-1 and another cooperating source ("CS-2")² met

²CS-2 is a paid informant who has been providing information to the DEA for approximately 2 years. Information provided by CS-2 has proven reliable in the past and has been corroborated by, among other things, surveillance by law enforcement.

with RICHARD GALIMI, the defendant, at Restaurant-1, which meeting was surveilled by DEA agents, including myself, and recorded at the direction of the DEA.³ Based on my debriefing of CS-1 and CS-2 following the meeting, I have learned that the following occurred:

a. During the meeting, CS-2 indicated to GALIMI, in substance and in part, that he was interested in purchasing Flakka from GALIMI.

b. GALIMI responded, in substance and in part, that he had to get Flakka from China, and that GALIMI had recently lost a shipment of chemicals that was seized by law enforcement at John F. Kennedy International Airport.

c. GALIMI further stated, in substance and in part, that he uses four brokers to get Flakka from China to New York, via various forms of international mail service. GALIMI estimated that he ships approximately 3,000 capsules of Flakka from China to the United States on a regular basis. GALIMI also explained that his Flakka supply comes from multiple cities in China, including Shenzhen and Guangdong, is then shipped to Hong Kong, and is then shipped to the United States for distribution. GALIMI also mentioned that he receives empty baggies from China that he uses for distribution purposes.

d. GALIMI stated, in substance and in part, that he wanted to bring approximately 2 kegs of Flakka from China, which he indicated is approximately 2,000 packets or capsules of Flakka.

e. During the meeting CS-2 informed GALIMI, in substance and in part, that he wanted samples of Flakka from GALIMI that he could give to CS-2's buyers. CS-2 also stated to GALIMI, in substance and in part, that CS-2 wanted the product to be of a high quality.

f. GALIMI responded, in substance and in part, that he would obtain approximately 3,000 capsules of Flakka for CS-2. GALIMI also informed CS-2 that GALIMI did currently have

³ I and other DEA agents conducted surveillance of the meeting, and I positively identified RICHARD GALIMI, the defendant, as the individual meeting with CS-1 and CS-2 inside of Restaurant-1. I recognized GALIMI based on my prior review of GALIMI's drivers' license photograph and a booking photo associated with a prior arrest.

Flakka in his warehouse, but that he considered this product to be of poor quality and that, accordingly, he would not provide it to CS-2 as a sample.

g. During the meeting, GALIMI also stated, in substance and in part, that he has approximately ten warehouses that he maintains for the purpose of manufacturing Flakka and other synthetic controlled substances, and that he has never had any of his warehouses raided by law enforcement. GALIMI further stated, in substance and in part, that he had been getting more business recently as the result of the arrest of a group of Yemeni synthetic controlled substance distributors in Harlem, New York.

10. On or about September 21, 2015, CS-1 sent a text message to RICHARD GALIMI, the defendant, regarding meeting later that day at a restaurant located in the vicinity of Emmons Avenue in Brooklyn, New York ("Restaurant-2"). Later that same day, GALIMI sent a text message to CS-1 inquiring, in substance and in part, whether CS-1 and CS-2 were on their way to Restaurant-2. CS-1 sent a text message to GALIMI to confirm the meeting location at Restaurant-2.

11. On or about September 21, 2015, at the direction of the DEA, CS-1 and CS-2 met with RICHARD GALIMI, the defendant, at Restaurant-2, which meeting was surveilled by DEA agents including myself, and recorded at the direction of the DEA. A DEA agent conducting surveillance of the meeting ("Agent-1") observed GALIMI park a vehicle bearing New York license plate GUP-1426 ("Vehicle-1") in the nearby vicinity of Restaurant-2, exit Vehicle-1, and enter Restaurant-2.⁴ CS-1 and CS-2 were subsequently observed arriving at Restaurant-2, entering Restaurant-2, and then sitting down at a table with GALIMI. Based on the surveillance of the meeting, as well as my discussions with CS-1 and CS-2, I have learned, among other things, the following:

a. Approximately twenty minutes after CS-1 and CS-2 arrived at the meeting at Restaurant-2, I observed CS-1 stand up from the table at Restaurant-2, exit Restaurant-2, and walk towards Vehicle-1. CS-2 and GALIMI remained seated at the table after CS-1 exited Restaurant-2.

⁴Based on my review of vehicle registration records, I have learned that Vehicle-1 is registered in New York to RICHARD GALIMI.

b. I then observed CS-1 open the trunk of Vehicle-1 and take a white U.S. Postal Priority Mail parcel ("Mail Parcel-1") out of the trunk. CS-1 was then observed walking back into Restaurant-2 while carrying Mail Parcel-1.

c. CS-1 and CS-2 were subsequently observed exiting Restaurant-2. CS-1 and CS-2 then met with DEA agents conducting surveillance of the meeting and provided me with Mail Parcel-1.

d. Based on my debriefing of CS-1 and CS-2, I have learned that CS-2 provided GALIMI with \$1,000 in U.S. currency (which had been provided by the DEA prior to the meeting) while at Restaurant-2. GALIMI then instructed CS-1 to go to Vehicle-1 and retrieve the Flakka from the trunk, which GALIMI indicated was contained in a mail parcel inside the trunk. GALIMI also informed CS-2, in substance and in part, that the Flakka GALIMI was providing was not of the best quality and that CS-2 should not judge him by this product, as he was expecting to receive a shipment of better quality Flakka from China in the coming weeks.

e. Based on my review of Mail Parcel-1, I determined that Mail Parcel-1 contained approximately 250 packets of suspected Flakka, with each packet bearing the brand name "Mandy."

12. On or about October 1, 2015, at the direction of the DEA, CS-1 and CS-2 met with RICHARD GALIMI, the defendant, at Restaurant-2, which meeting was surveilled by DEA agents including myself, and recorded at the direction of the DEA. Based on the surveillance of the meeting, as well as my discussions with CS-1 and CS-2, I have learned, among other things, the following:

a. During the meeting, GALIMI stated to CS-2, in substance and in part, that GALIMI wanted to sell CS-2 approximately 3,300 packets of Flakka for \$18,000.00, and that GALIMI was angry when CS-2 indicated, in substance and in part, that CS-2 only wanted to purchase approximately 348 packets of Flakka for \$2,000.00.

b. Following this discussion, CS-1 and GALIMI exited Restaurant-2 and walked toward Vehicle-1, which was parked in the nearby vicinity. GALIMI then opened the trunk of Vehicle-1 and GALIMI was observed giving CS-1 a black bag (the "Black Bag"). CS-1 and GALIMI then were observed walking back inside of Restaurant-2.

c. After CS-1 and GALIMI returned inside Restaurant-2, CS-1 handed the Black Bag to CS-2, and CS-2 provided GALIMI with \$2,000 in currency that had been provided by the DEA prior to the meeting. During the meeting, GALIMI stated, in substance and in part, that the Flakka CS-2 was purchasing from GALIMI was of good quality.

d. Shortly thereafter, CS-1 and CS-2 were observed exiting Restaurant-2.

13. Shortly after the meeting on October 1, 2015, I took custody of the Black Bag provided by RICHARD GALIMI, the defendant, during the meeting. Based on my examination of the Black Bag, I determined that the bag contained approximately 348 white packets of suspected Flakka inside of a large zip lock baggie. Based on my discussions with a DEA chemist, as well as my review of a DEA laboratory report, I have learned that the substance contained inside the packets sold by RICHARD GALIMI, the defendant, to CS-2 on or about October 1, 2015 tested positive for the presence of Alpha-PVP. As is described above, Alpha-PVP was classified as a Schedule I controlled substance on or about March 7, 2014.

14. On or about November 6, 2015, CS-2, at the direction of the DEA, contacted RICHARD GALIMI, the defendant, by telephone, which call was recorded. At the time CS-2 placed the telephone call to GALIMI, CS-2 was located in Manhattan, New York. During the telephone call, CS-2 advised GALIMI, in substance and in part, that he would not be able to meet with GALIMI that day to purchase Flakka, but that he would contact GALIMI early the next week to set up the purchase. CS-2 further stated, in substance and in part, that GALIMI should have the product ready for CS-2 by the next week.

15. On or about November 11, 2015, CS-2, at the direction of the DEA, contacted RICHARD GALIMI, the defendant, by telephone, which telephone call was recorded. During the telephone call with GALIMI, CS-2 stated, in substance and in part, that he wanted to purchase \$2,500 worth of Flakka from GALIMI. GALIMI responded, in substance and in part, that he would meet CS-2 at Restaurant-2, within the next hour. Following the telephone call, GALIMI sent CS-2 a text message with the address of Restaurant-2.

16. At the time CS-2 placed the telephone call to RICHARD GALIMI, the defendant, I was conducting surveillance in

the vicinity of the location where GALIMI was believed to reside in Brooklyn, New York ("Residence-1").⁵ Shortly after the telephone call between GALIMI and CS-2 occurred, I observed GALIMI exit Residence-1 and enter the driver's seat of Vehicle-1, which was parked in the nearby vicinity of Residence-1. I then observed Vehicle-1 pull away from Residence-1, and I continued to conduct surveillance of Vehicle-1 as GALIMI drove Vehicle-1 onto the Belt Parkway.

17. At approximately the time when Vehicle-1 exited the Belt Parkway, another DEA agent participating in this investigation ("Agent-1") began to conduct surveillance of Vehicle-1 and I stopped conducting surveillance of Vehicle-1. Agent-1 continued to conduct surveillance of Vehicle-1 until Vehicle-1 arrived at a warehouse located on West 16th Street in Brooklyn, New York ("Warehouse-2"). Agent-1 and another DEA agent participating in this investigation ("Agent-2") then observed RICHARD GALIMI, the defendant, park Vehicle-1 in front of the garage door of Warehouse-2. Agent-1 and Agent-2 then observed GALIMI exit Vehicle-1 and unlock the steel roll up door of Warehouse-2 and then enter Warehouse-2.

18. Approximately fifteen minutes after RICHARD GALIMI, the defendant, entered Warehouse-2, Agent-1 observed GALIMI exit Warehouse-2 carrying a large weighted cardboard box ("Box-1"). Agent-1 then observed GALIMI place Box-1 into the trunk of Vehicle-1. GALIMI then entered the driver's seat of Vehicle-1 and drove away from Warehouse-2. Agent-1 and Agent-2 continued to conduct surveillance of Vehicle-1 after it departed from Warehouse-2, and observed Vehicle-1 drive from Warehouse-2 to Restaurant-2 and then park in the vicinity of Restaurant-2. After GALIMI parked Vehicle-1, Agent-1 and Agent-2 observed GALIMI exit Vehicle-1 and enter Restaurant-2.

19. I was also conducting surveillance in the

⁵ On or about October 13, 2015, the Honorable Kevin Nathaniel Fox, Magistrate Judge, Southern District of New York, approved a Warrant and Order for prospective and historical location information and pen register information for a cellular telephone believed to be used by RICHARD GALIMI (the "GALIMI Phone"). This Order authorized the collection of prospective location information from the GALIMI Phone for a period of forty-five days and pen register data for a period of sixty days. Utilizing prospective location information, I was able to conduct surveillance of GALIMI and, through this surveillance, I determined that GALIMI was likely residing at Residence-1.

vicinity of Restaurant-2 and, shortly thereafter, I observed CS-2 arrive in his vehicle and park in the vicinity of Restaurant-2. CS-2 then exited his vehicle and entered Restaurant-2. CS-2 then proceeded to meet with GALIMI inside of Restaurant-2, which meeting was recorded. Prior to meeting with GALIMI inside of Restaurant-2, CS-2 had been provided with \$2,500 in United States currency by the DEA, which CS-2 was instructed to provide to GALIMI in exchange for suspected Flakka.

20. Based on my and other DEA agents' surveillance of the November 11, 2015, meeting, which included my listening to portions of the conversation between CS-2 and RICHARD GALIMI, the defendant, through the use of a Kel receiver, as well as my debriefing of CS-2 following the meeting, I have learned that, during the meeting, the following took place, in substance and in part:

a. During the meeting, CS-2 stated, in substance and in part, that he wanted to buy \$2,500 of Flakka from GALIMI and that he had brought \$2,500 with him to the meeting.

b. GALIMI responded, in substance and in part, that he had brought 2,500 pieces of Flakka with him rather than \$2,500 worth of Flakka, and that he would have to separate out the appropriate portion of the 2,500 pieces to give to CS-2. GALIMI further stated, in substance and in part, that he had expected CS-2 to purchase all 2,500 pieces.

c. GALIMI then stated, in substance and in part, that he would have to go back to get the Flakka, and asked CS-2 to watch his bag. Prior to GALIMI exiting Restaurant-2, CS-2 provided GALIMI with the \$2,500 that had been provided to CS-2 by the DEA prior to the meeting.

d. Shortly thereafter, Agent-2 and I observed GALIMI exit Restaurant-2 and walk toward Vehicle-1. Another agent participating in this investigation who was also conducting surveillance in the vicinity of Restaurant-1 ("Agent-3") then observed GALIMI open the trunk of Vehicle-1 and GALIMI then stood in front of the open trunk of Vehicle-1 for approximately ten minutes, before closing the trunk. At no time was GALIMI observed opening any other doors of Vehicle-1 during this time period.

e. GALIMI was then observed walking toward Restaurant-2. I observed that GALIMI was carrying what appeared to be a white, plastic bag in his hand as he walked from

Vehicle-1 towards Restaurant-2. GALIMI then reentered Restaurant-2.

f. After GALIMI returned to Restaurant-2, he provided the white, plastic bag to CS-2. CS-2 stated to GALIMI, in substance and in part, that GALIMI should hold on to the remainder of the Flakka that GALIMI had brought with him to the meeting and that CS-2 would make arrangements to purchase the remainder of the Flakka in the event CS-2's customers liked the product. GALIMI responded, in substance and in part, that the product was very good and that GALIMI expected that CS-2's customers would be happy with the product.

g. GALIMI further stated to CS-2, in substance and in part, that CS-2 should be careful if CS-2 ever dealt with anyone in Passaic, New Jersey, because the people there are informants for the police. Shortly thereafter, CS-2 exited Restaurant-2.

21. After leaving Restaurant-2, CS-2 drove back to a nearby pre-designated meeting location in Brooklyn and then gave the white, plastic bag he had received from RICHARD GALIMI, the defendant, to me. After examining the bag that GALIMI had provided to CS-2, I determined that GALIMI had provided CS-2 with two white plastic bags, with one bag inside of the other, and that inside the two white plastic bags was a large, clear Ziploc bag. The Ziploc bag contained approximately 406 white packets of suspected Flakka.

22. Based on my discussions with a DEA chemist, I have learned that the substance contained inside the packets sold by RICHARD GALIMI, the defendant, to CS-2 on or about November 11, 2015 tested positive for the presence of Alpha-PVP. As is described above, Alpha-PVP was classified as a Schedule I controlled substance on or about March 7, 2014.

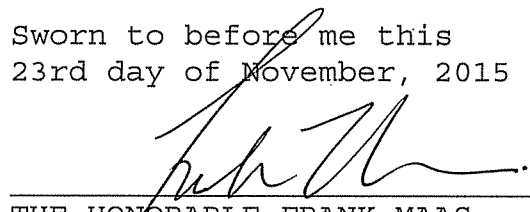
23. Shortly after the meeting between CS-2 and RICHARD GALIMI, the defendant, occurred, GALIMI sent a text message to CS-2 which stated, in substance and in part, the following: "The bag should have 400 or more pieces in it, disregard the numbers written on the bag."

WHEREFORE, the deponent respectfully requests that a warrant issue for the arrest of RICHARD GALIMI, the defendant, and that he be arrested and imprisoned, or bailed, as the case may be.



DERWIN D. KINSTON
SPECIAL AGENT
DRUG ENFORCEMENT ADMINISTRATION

Sworn to before me this
23rd day of November, 2015



THE HONORABLE FRANK MAAS
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK