

STATE OF NEW YORK
CITY COURT: CITY OF MIDDLETOWN

-----X
The People of the State of New York

vs.

FELONY COMPLAINT

Traquane Dolson, DOB 8/4/96
Defendant

-----X
STATE OF NEW YORK)
:ss:
COUNTY OF ORANGE)

I, Andrew Rosen, being duly sworn, depose and say that:

I am the complainant herein and am a POLICE OFFICER with the City of Middletown Police Department, Middletown, Orange County, New York.

I accuse the above-mentioned defendant, along with his co-defendants, JALEEL DOLSON, MICHAEL JACKSON, DEVELLE WILLIAMS, TYREE MANNINGS, MASON MILLIGAN, SEAN LENNON, and URSULA BERRY, in this action, and charge that the said defendants, acting individually, and in concert with each other and/or others, on or about and in between January 1, 2015 and August 20, 2018 in the City of Middletown, Orange County, New York, with having committed the Class E Felony of CONSPIRACY IN THE FOURTH DEGREE, in violation of Section 105.10, Subdivision 1, of the Penal Law of the State of New York.

The said defendants, acting individually and in concert with each other and/or others, on or about and in between January 1, 2015 and August 20, 2018, with intent that conduct constituting a class B felonies, to wit: CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39, Subdivision 1 of the Penal Law of the State of New York, and CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16, Subdivision 1 of the Penal Law of the State of New York be performed, did agree with one or more persons to engage in or cause the performance of such conduct as would constitute the above mentioned crimes, in that the defendants and those others agreed to: knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

It was the object of the conspiracy to sell narcotics on and around the Linden Avenue area of Middletown, Orange County, New York, and elsewhere. It was also an object to the conspiracy to discourage others not approved by the conspirators from selling narcotics in the Linden Avenue of Middletown, by among other methods, intimidating them and by committing violent acts. It was the method and plan of this conspiracy to sell and exchange cocaine among members of the conspiracy so that members of the conspiracy could sell cocaine and crack cocaine to other individuals outside of the conspiracy. In order to maintain control of the area, a number of the conspirators identify themselves a group called "Coke Wave." "Coke Wave" is an organization of individuals including, but not limited to, TRAQUANE DOLSON, MASON MILLIGAN, JALEEL DOLSON,

MICHAEL JACKSON, DEVELLE WILLIAMS, TYREE MANNINGS, SEAN LENNON, and URSULA BERRY are associates of "Coke Wave" who sold narcotics in conjunction and/or with the permission of "Coke Wave" members, and/or provided assistance to members of "Coke Wave."

Members of "Coke Wave" and their associates (1) are the exclusive sellers of narcotics in and around Linden Avenue, City of Middletown, County of Orange, State of New York (2) obtain and deliver narcotics, including cocaine, to customers; (3) protect and store quantities of narcotic drugs and the proceeds from the sale of narcotic drugs; (4) share in the proceeds from the sale of narcotic drugs; (5) provide surveillance of law enforcement on behalf of the members of the conspiracy in and around the City of Middletown, County of Orange, State of New York (6) protect other members of "Coke Wave" against any conflict with rival groups, including but not limited to "Guap Gang," by committing or threatening to commit violent acts and (7) instill fear in others by identifying themselves as "Coke Wave" members in various platforms, including on social media.

One overt act in furtherance of this conspiracy included that on or about June 20, 2018, the defendant, TRAQUANE DOLSON handed cocaine to another individual in exchange for money.

SECOND COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between June 20, 2018 with having committed the Class B Felony of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully sells a narcotic drug.

To wit: On or about 6/20/18, in the area of Linden Avenue in the City of Middletown, Orange County, New York, the defendant sold a narcotic drug, to wit: cocaine to another person.

THIRD COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between June 20, 2018 with having committed the Class B Felony of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully possesses a narcotic drug with the intent to sell it.

To wit: On or about 6/20/18, in the area of Linden Avenue in the City of Middletown, Orange County, New York, the defendant possessed a narcotic drug, to wit: cocaine with the intent to sell it.

FOURTH COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between June 22, 2018 with having committed the Class B Felony of CRIMINAL SALE OF

A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully sells a narcotic drug.

To wit: On or about June 22, 2018, in the area of Linden Avenue in the City of Middletown, Orange County, New York, the defendant sold a narcotic drug, to wit: cocaine to another person.

FIFTH COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between June 22, 2018 with having committed the Class B Felony of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully possesses a narcotic drug with the intent to sell it.

To wit: On or about 6/22/18, in the area of Linden Avenue in the City of Middletown, Orange County, New York, the defendant possessed a narcotic drug, to wit: cocaine with the intent to sell it.

The above allegations of fact are made by the Complainant herein based upon a police investigation.

SIXTH COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between July 3, 2018 with having committed the Class B Felony of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully sells a narcotic drug.

To wit: On or about July 3, 2018, in the area of Linden Avenue in the City of Middletown, Orange County, New York, the defendant sold a narcotic drug, to wit: cocaine to another person.

SEVENTH COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between July 3, 2018 with having committed the Class B Felony of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully possesses a narcotic drug with the intent to sell it.

To wit: On or about July 3, 2018, in the area of Linden Avenue in the City of Middletown, Orange County, New York, the defendant possessed a narcotic drug, to wit: cocaine with the intent to sell it.

EIGHTH COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between July 6, 2018 with having committed the Class B Felony of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully sells a narcotic drug.

To wit: On or about July 6, 2018, in the area of 142 Linden Avenue in the City of Middletown, Orange County, New York, the defendant sold a narcotic drug, to wit: cocaine to another person.

NINTH COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between July 6, 2018 with having committed the Class B Felony of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully possesses a narcotic drug with the intent to sell it.

To wit: On or about July 6, 2018, in the area of Linden Avenue in the City of Middletown, Orange County, New York, the defendant possessed a narcotic drug, to wit: cocaine with the intent to sell it.

TENTH COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between August 13, 2018 with having committed the Class B Felony of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully sells a narcotic drug.

To wit: On or about August 13, 2018, in the area of 142 Linden Avenue in the City of Middletown, Orange County, New York, the defendant sold a narcotic drug, to wit: cocaine to another person.

ELEVENTH COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between August 13, 2018 with having committed the Class B Felony of CRIMINAL

POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully possesses a narcotic drug with the intent to sell it.

To wit: On or about August 13, 2018, in the area of Linden Avenue in the City of Middletown, Orange County, New York, the defendant possessed a narcotic drug, to wit: cocaine with the intent to sell it.

The above allegations of fact are made by the Complainant herein based upon a police investigation.

STATE OF NEW YORK
CITY COURT: CITY OF MIDDLETOWN

-----X
The People of the State of New York

vs.

FELONY COMPLAINT

Mason Milligan, DOB 4/9/99

Defendant

-----X
STATE OF NEW YORK)

:ss:

COUNTY OF ORANGE)

I, Andrew Rosen, being duly sworn, depose and say that:

I am the complainant herein and am a POLICE OFFICER with the City of Middletown Police Department, Middletown, Orange County, New York.

I accuse the above-mentioned defendant, along with his co-defendants, JALEEL DOLSON, MICHAEL JACKSON, DEVELLE WILLIAMS, TYREE MANNINGS, TRAQUANE DOLSON, SEAN LENNON, and URSULA BERRY, in this action, and charge that the said defendants, acting individually, and in concert with each other and/or others, on or about and in between January 1, 2015 and August 20, 2018 in the City of Middletown, Orange County, New York, with having committed the Class E Felony of CONSPIRACY IN THE FOURTH DEGREE, in violation of Section 105.10, Subdivision 1, of the Penal Law of the State of New York.

The said defendants, acting individually and in concert with each other and/or others, on or about and in between January 1, 2015 and August 20, 2018, with intent that conduct constituting a class B felonies, to wit: CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39, Subdivision 1 of the Penal Law of the State of New York, and CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16, Subdivision 1 of the Penal Law of the State of New York be performed, did agree with one or more persons to engage in or cause the performance of such conduct as would constitute the above mentioned crimes, in that the defendants and those others agreed to: knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

It was the object of the conspiracy to sell narcotics on and around the Linden Avenue area of Middletown, Orange County, New York, and elsewhere. It was also an object to the conspiracy to discourage others not approved by the conspirators from selling narcotics in the Linden Avenue of Middletown, by among other methods, intimidating them and by committing violent acts. It was the method and plan of this conspiracy to sell and exchange cocaine among members of the conspiracy so that members of the conspiracy could sell cocaine and crack cocaine to other individuals outside of the conspiracy. In order to maintain control of the area, a number of the conspirators identify themselves a group called "Coke Wave." "Coke Wave" is an organization of individuals including, but not limited to, TRAQUANE DOLSON, MASON MILLIGAN, JALEEL DOLSON,

MICHAEL JACKSON, DEVELLE WILLIAMS, TYREE MANNINGS, SEAN LENNON, and URSULA BERRY are associates of "Coke Wave" who sold narcotics in conjunction and/or with the permission of "Coke Wave" members, and/or provided assistance to members of "Coke Wave."

Members of "Coke Wave" and their associates (1) are the exclusive sellers of narcotics in and around Linden Avenue, City of Middletown, County of Orange, State of New York (2) obtain and deliver narcotics, including cocaine, to customers; (3) protect and store quantities of narcotic drugs and the proceeds from the sale of narcotic drugs; (4) share in the proceeds from the sale of narcotic drugs; (5) provide surveillance of law enforcement on behalf of the members of the conspiracy in and around the City of Middletown, County of Orange, State of New York (6) protect other members of "Coke Wave" against any conflict with rival groups, including but not limited to "Guap Gang," by committing or threatening to commit violent acts and (7) instill fear in others by identifying themselves as "Coke Wave" members in various platforms, including on social media.

One overt act in furtherance of this conspiracy included that on or about August 2, 2017, the defendant, MASON MILLIGAN handed cocaine to another individual in exchange for money.

SECOND COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between August 2, 2017 with having committed the Class B Felony of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully sells a narcotic drug.

To wit: On or about 8/2/17, in the area of Low Ave and Smith St. in the City of Middletown, Orange County, New York, the defendant sold a narcotic drug, to wit: cocaine to another person.

THIRD COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between August 2, 2017 with having committed the Class B Felony of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully possesses a narcotic drug with the intent to sell it.

To wit: On or about 8/2/17, in the area of Low Ave and Smith St. in the City of Middletown, Orange County, New York, the defendant possessed a narcotic drug, to wit: cocaine with the intent to sell it.

FOURTH COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between August 4, 2017 with having committed the Class B Felony of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully sells a narcotic drug.

To wit: On or about 8/4/17, in the area of Academy Avenue in the City of Middletown, Orange County, New York, the defendant sold a narcotic drug, to wit: cocaine to another person.

FIFTH COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between August 4, 2017 with having committed the Class B Felony of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully possesses a narcotic drug with the intent to sell it.

To wit: On or about 8/4/17, in the area of Academy Avenue in the City of Middletown, Orange County, New York, the defendant possessed a narcotic drug, to wit: cocaine with the intent to sell it.

SIXTH COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between August 9, 2017 with having committed the Class B Felony of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully sells a narcotic drug.

To wit: On or about 8/9/17, in the area of Wickham Avenue in the City of Middletown, Orange County, New York, the defendant sold a narcotic drug, to wit: cocaine to another person.

SEVENTH COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between August 9, 2017 with having committed the Class B Felony of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully possesses a narcotic drug with the intent to sell it.

To wit: On or about 8/9/17, in the area of Wickham Avenue in the City of Middletown, Orange County, New York, the defendant possessed a narcotic drug, to wit: cocaine with the intent to sell it.

EIGHTH COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between March 13, 2018 with having committed the Class B Felony of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully sells a narcotic drug.

To wit: On or about 3/13/18, in the area of 142 Linden Avenue in the City of Middletown, Orange County, New York, the defendant sold a narcotic drug, to wit: cocaine to another person.

NINTH COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between March 13, 2018 with having committed the Class B Felony of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully possesses a narcotic drug with the intent to sell it.

To wit: On or about 3/13/18, in the area of Wickham Avenue in the City of Middletown, Orange County, New York, the defendant possessed a narcotic drug, to wit: cocaine with the intent to sell it.

The above allegations of fact are made by the Complainant herein based upon a police investigation.

STATE OF NEW YORK
CITY COURT: CITY OF MIDDLETOWN

-----X
The People of the State of New York

vs.

FELONY COMPLAINT

Michael Jackson, DOB 6/13/88
Defendant

-----X
STATE OF NEW YORK)
:ss:
COUNTY OF ORANGE)

I, Andrew Rosen, being duly sworn, depose and say that:

I am the complainant herein and am a POLICE OFFICER with the City of Middletown Police Department, Middletown, Orange County, New York.

I accuse the above-mentioned defendant, along with his co-defendants, MASON MILLIGAN, JALEEL DOLSON, DEVELLE WILLIAMS, TYREE MANNINGS, TRAQUANE DOLSON, SEAN LENNON, and URSULA BERRY, in this action, and charge that the said defendants, acting individually, and in concert with each other and/or others, on or about and in between January 1, 2015 and August 20, 2018 in the City of Middletown, Orange County, New York, with having committed the Class E Felony of CONSPIRACY IN THE FOURTH DEGREE, in violation of Section 105.10, Subdivision 1, of the Penal Law of the State of New York.

The said defendants, acting individually and in concert with each other and/or others, on or about and in between January 1, 2015 and August 20, 2018, with intent that conduct constituting a class B felonies, to wit: CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39, Subdivision 1 of the Penal Law of the State of New York, and CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16, Subdivision 1 of the Penal Law of the State of New York be performed, did agree with one or more persons to engage in or cause the performance of such conduct as would constitute the above mentioned crimes, in that the defendants and those others agreed to: knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

It was the object of the conspiracy to sell narcotics on and around the Linden Avenue area of Middletown, Orange County, New York, and elsewhere. It was also an object to the conspiracy to discourage others not approved by the conspirators from selling narcotics in the Linden Avenue of Middletown, by among other methods, intimidating them and by committing violent acts. It was the method and plan of this conspiracy to sell and exchange cocaine among members of the conspiracy so that members of the conspiracy could sell cocaine and crack cocaine to other individuals outside of the conspiracy. In order to maintain control of the area, a number of the conspirators identify themselves a group called "Coke Wave." "Coke Wave" is an organization of individuals including, but not limited to, TRAQUANE DOLSON, MASON MILLIGAN, JALEEL DOLSON,

MICHAEL JACKSON, DEVELLE WILLIAMS, TYREE MANNINGS, SEAN LENNON, and URSULA BERRY are associates of "Coke Wave" who sold narcotics in conjunction and/or with the permission of "Coke Wave" members, and/or provided assistance to members of "Coke Wave."

Members of "Coke Wave" and their associates (1) are the exclusive sellers of narcotics in and around Linden Avenue, City of Middletown, County of Orange, State of New York (2) obtain and deliver narcotics, including cocaine, to customers; (3) protect and store quantities of narcotic drugs and the proceeds from the sale of narcotic drugs; (4) share in the proceeds from the sale of narcotic drugs; (5) provide surveillance of law enforcement on behalf of the members of the conspiracy in and around the City of Middletown, County of Orange, State of New York (6) protect other members of "Coke Wave" against any conflict with rival groups, including but not limited to "Guap Gang," by committing or threatening to commit violent acts and (7) instill fear in others by identifying themselves as "Coke Wave" members in various platforms, including on social media.

One overt act in furtherance of this conspiracy included that on or about March 12, 2018, the defendant, MICHAEL JACKSON handed cocaine to another individual in exchange for money.

SECOND COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between March 12, 2018 with having committed the Class B Felony of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully sells a narcotic drug.

To wit: On or about 3/12/18 at approximately 7:24 p.m. in the area of Linden Avenue in the City of Middletown, Orange County, New York, the defendant sold a narcotic drug, to wit: cocaine to another person.

THIRD COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between March 12, 2018 with having committed the Class B Felony of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully possesses a narcotic drug with the intent to sell it.

To wit: On or about 3/12/18 at approximately 7:24 p.m. in the area of Linden Avenue in the City of Middletown, Orange County, New York, the defendant possessed a narcotic drug, to wit: cocaine with the intent to sell it.

FOURTH COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between March 12, 2018 with having committed the Class B Felony of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully sells a narcotic drug.

To wit: On or about 3/12/18 at approximately 7:51 p.m. in the area of Linden Avenue in the City of Middletown, Orange County, New York, the defendant sold a narcotic drug, to wit: cocaine to another person.

FIFTH COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between March 12, 2018 with having committed the Class B Felony of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully possesses a narcotic drug with the intent to sell it.

To wit: On or about 3/12/18 at approximately 7:51 p.m. in the area of Linden Avenue in the City of Middletown, Orange County, New York, the defendant possessed a narcotic drug, to wit: cocaine with the intent to sell it.

The above allegations of fact are made by the Complainant herein based upon a police investigation.

STATE OF NEW YORK
CITY COURT: CITY OF MIDDLETOWN

-----X
The People of the State of New York

vs.

FELONY COMPLAINT

Ursula Berry, DOB 12/30/94

Defendant

-----X
STATE OF NEW YORK)

:ss:

COUNTY OF ORANGE)

I, David Ruderfer, being duly sworn, depose and say that:

I am the complainant herein and am an INVESTIGATOR with the New York State Police, Middletown, Orange County, New York.

I accuse the above-mentioned defendant, along with his co-defendants, MASON MILLIGAN, MICHAEL JACKSON, JALEEL DOLSON, TYREE MANNINGS, TRAQUANE DOLSON, SEAN LENNON, and DEVELLE WILLIAMS in this action, and charge that the said defendants, acting individually, and in concert with each other and/or others, on or about and in between January 1, 2015 and August 20, 2018 in the City of Middletown, Orange County, New York, with having committed the Class E Felony of CONSPIRACY IN THE FOURTH DEGREE, in violation of Section 105.10, Subdivision 1, of the Penal Law of the State of New York.

The said defendants, acting individually and in concert with each other and/or others, on or about and in between January 1, 2015 and August 20, 2018, with intent that conduct constituting a class B felonies, to wit: CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39, Subdivision 1 of the Penal Law of the State of New York, and CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16, Subdivision 1 of the Penal Law of the State of New York be performed, did agree with one or more persons to engage in or cause the performance of such conduct as would constitute the above mentioned crimes, in that the defendants and those others agreed to: knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

It was the object of the conspiracy to sell narcotics on and around the Linden Avenue area of Middletown, Orange County, New York, and elsewhere. It was also an object to the conspiracy to discourage others not approved by the conspirators from selling narcotics in the Linden Avenue of Middletown, by among other methods, intimidating them and by committing violent acts. It was the method and plan of this conspiracy to sell and exchange cocaine among members of the conspiracy so that members of the conspiracy could sell cocaine and crack cocaine to other individuals outside of the conspiracy. In order to maintain control of the area, a number of the conspirators identify themselves a group called "Coke Wave." "Coke Wave" is an organization of individuals including, but not limited to, TRAQUANE DOLSON, MASON MILLIGAN, JALEEL DOLSON,

MICHAEL JACKSON, DEVELLE WILLIAMS, TYREE MANNINGS, SEAN LENNON, and URSULA BERRY are associates of "Coke Wave" who sold narcotics in conjunction and/or with the permission of "Coke Wave" members, and/or provided assistance to members of "Coke Wave."

Members of "Coke Wave" and their associates (1) are the exclusive sellers of narcotics in and around Linden Avenue, City of Middletown, County of Orange, State of New York (2) obtain and deliver narcotics, including cocaine, to customers; (3) protect and store quantities of narcotic drugs and the proceeds from the sale of narcotic drugs; (4) share in the proceeds from the sale of narcotic drugs; (5) provide surveillance of law enforcement on behalf of the members of the conspiracy in and around the City of Middletown, County of Orange, State of New York (6) protect other members of "Coke Wave" against any conflict with rival groups, including but not limited to "Guap Gang," by committing or threatening to commit violent acts and (7) instill fear in others by identifying themselves as "Coke Wave" members in various platforms, including on social media.

One overt act in furtherance of this conspiracy included that on or about June 22, 2018, the defendant, URSULA BERRY handed cocaine to another individual in exchange for money.

SECOND COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between June 22, 2018 with having committed the Class B Felony of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully sells a narcotic drug.

To wit: On or about 6/22/18 in the area of 26 Cortland St. in the City of Middletown, Orange County, New York, the defendant sold a narcotic drug, to wit: cocaine to another person.

THIRD COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between June 22, 2018 with having committed the Class B Felony of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully possesses a narcotic drug with the intent to sell it.

To wit: On or about 6/22/18, in the area of 26 Cortland St. in the City of Middletown, Orange County, New York, the defendant possessed a narcotic drug, to wit: cocaine with the intent to sell it.

FOURTH COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between July 12, 2018 with having committed the Class B Felony of CRIMINAL SALE OF

A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully sells a narcotic drug.

To wit: On or about July 12, 2018, in the area of 26 Cortland St. in the City of Middletown, Orange County, New York, the defendant sold a narcotic drug, to wit: cocaine to another person.

FIFTH COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between July 12, 2018 with having committed the Class B Felony of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully possesses a narcotic drug with the intent to sell it.

To wit: On or about 7/12/18, in the area of 26 Cortland St. in the City of Middletown, Orange County, New York, the defendant possessed a narcotic drug, to wit: cocaine with the intent to sell it.

SIXTH COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between August 14, 2018 with having committed the Class B Felony of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully sells a narcotic drug.

To wit: On or about 8/14/18, in the area of 26 Cortland St. in the City of Middletown, Orange County, New York, the defendant sold a narcotic drug, to wit: cocaine to another person.

SEVENTH COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between August 14, 2018 with having committed the Class B Felony of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully possesses a narcotic drug with the intent to sell it.

To wit: On or about 8/14/18, in the area of 26 Cortland St. in the City of Middletown, Orange County, New York, the defendant possessed a narcotic drug, to wit: cocaine with the intent to sell it.

The above allegations of fact are made by the Complainant herein based upon a police investigation.

STATE OF NEW YORK
CITY COURT: CITY OF MIDDLETOWN

-----X
The People of the State of New York

vs.

FELONY COMPLAINT

Jaleel Dolson, DOB 12/7/93

Defendant

-----X
STATE OF NEW YORK)

:ss:

COUNTY OF ORANGE)

I, Andrew Rosen, being duly sworn, depose and say that:

I am the complainant herein and am a POLICE OFFICER with the City of Middletown Police Department, Middletown, Orange County, New York.

I accuse the above-mentioned defendant, along with his co-defendants, MASON MILLIGAN, MICHAEL JACKSON, DEVELLE WILLIAMS, TYREE MANNINGS, TRAQUANE DOLSON, SEAN LENNON, and URSULA BERRY, in this action, and charge that the said defendants, acting individually, and in concert with each other and/or others, on or about and in between January 1, 2015 and August 20, 2018 in the City of Middletown, Orange County, New York, with having committed the Class E Felony of CONSPIRACY IN THE FOURTH DEGREE, in violation of Section 105.10, Subdivision 1, of the Penal Law of the State of New York.

The said defendants, acting individually and in concert with each other and/or others, on or about and in between January 1, 2015 and August 20, 2018, with intent that conduct constituting a class B felonies, to wit: CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39, Subdivision 1 of the Penal Law of the State of New York, and CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16, Subdivision 1 of the Penal Law of the State of New York be performed, did agree with one or more persons to engage in or cause the performance of such conduct as would constitute the above mentioned crimes, in that the defendants and those others agreed to: knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

It was the object of the conspiracy to sell narcotics on and around the Linden Avenue area of Middletown, Orange County, New York, and elsewhere. It was also an object to the conspiracy to discourage others not approved by the conspirators from selling narcotics in the Linden Avenue of Middletown, by among other methods, intimidating them and by committing violent acts. It was the method and plan of this conspiracy to sell and exchange cocaine among members of the conspiracy so that members of the conspiracy could sell cocaine and crack cocaine to other individuals outside of the conspiracy. In order to maintain control of the area, a number of the conspirators identify themselves a group called "Coke Wave." "Coke Wave" is an organization of individuals including,

but not limited to, TRAQUANE DOLSON, MASON MILLIGAN, JALEEL DOLSON, MICHAEL JACKSON, DEVELLE WILLIAMS, TYREE MANNINGS, SEAN LENNON, and URSULA BERRY are associates of "Coke Wave" who sold narcotics in conjunction and/or with the permission of "Coke Wave" members, and/or provided assistance to members of "Coke Wave."

Members of "Coke Wave" and their associates (1) are the exclusive sellers of narcotics in and around Linden Avenue, City of Middletown, County of Orange, State of New York (2) obtain and deliver narcotics, including cocaine, to customers; (3) protect and store quantities of narcotic drugs and the proceeds from the sale of narcotic drugs; (4) share in the proceeds from the sale of narcotics drugs; (5) provide surveillance of law enforcement on behalf of the members of the conspiracy in and around the City of Middletown, County of Orange, State of New York (6) protect other members of "Coke Wave" against any conflict with rival groups, including but not limited to "Guap Gang," by committing or threatening to commit violent acts and (7) instill fear in others by identifying themselves as "Coke Wave" members in various platforms, including on social media.

One overt act in furtherance of this conspiracy included that on or about January 20, 2018, the defendant, JALEEL DOLSON handed cocaine to another individual in exchange for money.

SECOND COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between January 20, 2018 with having committed the Class B Felony of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully sells a narcotic drug.

To wit: On or about 1/20/18 in the area of Linden Avenue in the City of Middletown, Orange County, New York, the defendant sold a narcotic drug, to wit: cocaine to another person.

THIRD COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between January 20, 2018 with having committed the Class B Felony of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully possesses a narcotic drug with the intent to sell it.

To wit: On or about 1/20/18, in the area of Linden Avenue in the City of Middletown, Orange County, New York, the defendant possessed a narcotic drug, to wit: cocaine with the intent to sell it.

FOURTH COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between January 23, 2018 with having committed the Class B Felony of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully sells a narcotic drug.

To wit: On or about 1/23/18, in the area of Linden Avenue in the City of Middletown, Orange County, New York, the defendant sold a narcotic drug, to wit: cocaine to another person.

FIFTH COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between January 23, 2018 with having committed the Class B Felony of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully possesses a narcotic drug with the intent to sell it.

To wit: On or about 1/23/18, in the area of Linden Avenue in the City of Middletown, Orange County, New York, the defendant possessed a narcotic drug, to wit: cocaine with the intent to sell it.

SIXTH COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between January 25, 2018 with having committed the Class B Felony of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully sells a narcotic drug.

To wit: On or about 1/25/18, in the area of Linden Avenue in the City of Middletown, Orange County, New York, the defendant sold a narcotic drug, to wit: cocaine to another person.

SEVENTH COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between January 25, 2018 with having committed the Class B Felony of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully possesses a narcotic drug with the intent to sell it.

To wit: On or about 1/25/18, in the area of Linden Avenue in the City of Middletown, Orange County, New York, the defendant possessed a narcotic drug, to wit: cocaine with the intent to sell it.

The above allegations of fact are made by the Complainant herein based upon a police investigation.

STATE OF NEW YORK
CITY COURT: CITY OF MIDDLETOWN

-----X
The People of the State of New York

vs.

FELONY COMPLAINT

Tyree Mannings, DOB 12/23/00
Defendant

-----X
STATE OF NEW YORK)
:ss:
COUNTY OF ORANGE)

I, Andrew Rosen, being duly sworn, depose and say that:

I am the complainant herein and am a POLICE OFFICER with the City of Middletown Police Department, Middletown, Orange County, New York.

I accuse the above-mentioned defendant, along with his co-defendants, MASON MILLIGAN, MICHAEL JACKSON, DEVELLE WILLIAMS, JALEEL DOLSON, TRAQUANE DOLSON, SEAN LENNON, and URSULA BERRY, in this action, and charge that the said defendants, acting individually, and in concert with each other and/or others, on or about and in between January 1, 2015 and August 20, 2018 in the City of Middletown, Orange County, New York, with having committed the Class E Felony of CONSPIRACY IN THE FOURTH DEGREE, in violation of Section 105.10, Subdivision 1, of the Penal Law of the State of New York.

The said defendants, acting individually and in concert with each other and/or others, on or about and in between January 1, 2015 and August 20, 2018, with intent that conduct constituting a class B felonies, to wit: CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39, Subdivision 1 of the Penal Law of the State of New York, and CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16, Subdivision 1 of the Penal Law of the State of New York be performed, did agree with one or more persons to engage in or cause the performance of such conduct as would constitute the above mentioned crimes, in that the defendants and those others agreed to: knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

It was the object of the conspiracy to sell narcotics on and around the Linden Avenue area of Middletown, Orange County, New York, and elsewhere. It was also an object to the conspiracy to discourage others not approved by the conspirators from selling narcotics in the Linden Avenue of Middletown, by among other methods, intimidating them and by committing violent acts. It was the method and plan of this conspiracy to sell and exchange cocaine among members of the conspiracy so that members of the conspiracy could sell cocaine and crack cocaine to other individuals outside of the conspiracy. In order to maintain control of the area, a number of the conspirators identify themselves a group called "Coke Wave." "Coke Wave" is an organization of individuals including, but not limited to, TRAQUANE DOLSON, MASON MILLIGAN, JALEEL DOLSON,

MICHAEL JACKSON, DEVELLE WILLIAMS, TYREE MANNINGS, SEAN LENNON, and URSULA BERRY are associates of "Coke Wave" who sold narcotics in conjunction and/or with the permission of "Coke Wave" members, and/or provided assistance to members of "Coke Wave."

Members of "Coke Wave" and their associates (1) are the exclusive sellers of narcotics in and around Linden Avenue, City of Middletown, County of Orange, State of New York (2) obtain and deliver narcotics, including cocaine, to customers; (3) protect and store quantities of narcotic drugs and the proceeds from the sale of narcotic drugs; (4) share in the proceeds from the sale of narcotic drugs; (5) provide surveillance of law enforcement on behalf of the members of the conspiracy in and around the City of Middletown, County of Orange, State of New York (6) protect other members of "Coke Wave" against any conflict with rival groups, including but not limited to "Guap Gang," by committing or threatening to commit violent acts and (7) instill fear in others by identifying themselves as "Coke Wave" members in various platforms, including on social media.

One overt act in furtherance of this conspiracy included that on or about June 12, 2018, the defendant, TYREE MANNINGS handed cocaine to another individual in exchange for money.

The above allegations of fact are made by the Complainant herein based upon a police investigation.

STATE OF NEW YORK
CITY COURT: CITY OF MIDDLETOWN

-----X
The People of the State of New York

vs.

FELONY COMPLAINT

Sean Lennon, DOB 1/3/90

Defendant

-----X
STATE OF NEW YORK)

:ss:

COUNTY OF ORANGE)

I, Mario Restivo, being duly sworn, depose and say that:

I am the complainant herein and am an SENIOR INVESTIGATOR with the New York State Police, Middletown, Orange County, New York.

I accuse the above-mentioned defendant, along with his co-defendants, MASON MILLIGAN, MICHAEL JACKSON, DEVELLE WILLIAMS, TYREE MANNINGS, TRAQUANE DOLSON, JALEEL DOLSON, and URSULA BERRY, in this action, and charge that the said defendants, acting individually, and in concert with each other and/or others, on or about and in between January 1, 2015 and August 20, 2018 in the City of Middletown, Orange County, New York, with having committed the Class E Felony of CONSPIRACY IN THE FOURTH DEGREE, in violation of Section 105.10, Subdivision 1, of the Penal Law of the State of New York.

The said defendants, acting individually and in concert with each other and/or others, on or about and in between January 1, 2015 and August 20, 2018, with intent that conduct constituting a class B felonies, to wit: CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39, Subdivision 1 of the Penal Law of the State of New York, and CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16, Subdivision 1 of the Penal Law of the State of New York be performed, did agree with one or more persons to engage in or cause the performance of such conduct as would constitute the above mentioned crimes, in that the defendants and those others agreed to: knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

It was the object of the conspiracy to sell narcotics on and around the Linden Avenue area of Middletown, Orange County, New York, and elsewhere. It was also an object to the conspiracy to discourage others not approved by the conspirators from selling narcotics in the Linden Avenue of Middletown, by among other methods, intimidating them and by committing violent acts. It was the method and plan of this conspiracy to sell and exchange cocaine among members of the conspiracy so that members of the conspiracy could sell cocaine and crack cocaine to other individuals outside of the conspiracy. In order to maintain control of the area, a number of the conspirators identify themselves a group called "Coke Wave." "Coke Wave" is an organization of individuals including,

but not limited to, TRAQUANE DOLSON, MASON MILLIGAN, JALEEL DOLSON, MICHAEL JACKSON, DEVELLE WILLIAMS, TYREE MANNINGS, SEAN LENNON, and URSULA BERRY are associates of "Coke Wave" who sold narcotics in conjunction and/or with the permission of "Coke Wave" members, and/or provided assistance to members of "Coke Wave."

Members of "Coke Wave" and their associates (1) are the exclusive sellers of narcotics in and around Linden Avenue, City of Middletown, County of Orange, State of New York (2) obtain and deliver narcotics, including cocaine, to customers; (3) protect and store quantities of narcotic drugs and the proceeds from the sale of narcotic drugs; (4) share in the proceeds from the sale of narcotics drugs; (5) provide surveillance of law enforcement on behalf of the members of the conspiracy in and around the City of Middletown, County of Orange, State of New York (6) protect other members of "Coke Wave" against any conflict with rival groups, including but not limited to "Guap Gang," by committing or threatening to commit violent acts and (7) instill fear in others by identifying themselves as "Coke Wave" members in various platforms, including on social media.

One overt act in furtherance of this conspiracy included that on or about July 6, 2018, the defendant, SEAN LENNON handed cocaine to another individual in exchange for money.

SECOND COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between July 6, 2018 with having committed the Class B Felony of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully sells a narcotic drug.

To wit: On or about 7/6/18 in the area of Knapp St. in the City of Middletown, Orange County, New York, the defendant sold a narcotic drug, to wit: cocaine to another person.

THIRD COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between July 6, 2018 with having committed the Class B Felony of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully possesses a narcotic drug with the intent to sell it.

To wit: On or about 7/6/18, in the area of Knapp St. in the City of Middletown, Orange County, New York, the defendant possessed a narcotic drug, to wit: cocaine with the intent to sell it.

FOURTH COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between July 9, 2018 with having committed the Class B Felony of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully sells a narcotic drug.

To wit: On or about 7/9/18, in the area of Wickham Ave. in the City of Middletown, Orange County, New York, the defendant sold a narcotic drug, to wit: cocaine to another person.

FIFTH COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between July 9, 2018 with having committed the Class B Felony of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully possesses a narcotic drug with the intent to sell it.

To wit: On or about 7/9/18, in the area of Wickham Ave. in the City of Middletown, Orange County, New York, the defendant possessed a narcotic drug, to wit: cocaine with the intent to sell it.

The above allegations of fact are made by the Complainant herein based upon a police investigation.

STATE OF NEW YORK
CITY COURT: CITY OF MIDDLETOWN

-----X
The People of the State of New York

vs.

FELONY COMPLAINT

Develle Williams, DOB 12/30/94
Defendant

-----X
STATE OF NEW YORK)

:ss:
COUNTY OF ORANGE)

I, Andrew Rosen, being duly sworn, depose and say that:

I am the complainant herein and am a POLICE OFFICER with the City of Middletown Police Department, Middletown, Orange County, New York.

I accuse the above-mentioned defendant, along with his co-defendants, MASON MILLIGAN, MICHAEL JACKSON, JALEEL DOLSON, TYREE MANNINGS, TRAQUANE DOLSON, SEAN LENNON, and URSULA BERRY, in this action, and charge that the said defendants, acting individually, and in concert with each other and/or others, on or about and in between January 1, 2015 and August 20, 2018 in the City of Middletown, Orange County, New York, with having committed the Class E Felony of CONSPIRACY IN THE FOURTH DEGREE, in violation of Section 105.10, Subdivision 1, of the Penal Law of the State of New York.

The said defendants, acting individually and in concert with each other and/or others, on or about and in between January 1, 2015 and August 20, 2018, with intent that conduct constituting a class B felonies, to wit: CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39, Subdivision 1 of the Penal Law of the State of New York, and CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16, Subdivision 1 of the Penal Law of the State of New York be performed, did agree with one or more persons to engage in or cause the performance of such conduct as would constitute the above mentioned crimes, in that the defendants and those others agreed to: knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

It was the object of the conspiracy to sell narcotics on and around the Linden Avenue area of Middletown, Orange County, New York, and elsewhere. It was also an object to the conspiracy to discourage others not approved by the conspirators from selling narcotics in the Linden Avenue of Middletown, by among other methods, intimidating them and by committing violent acts. It was the method and plan of this conspiracy to sell and exchange cocaine among members of the conspiracy so that members of the conspiracy could sell cocaine and crack cocaine to other individuals outside of the conspiracy. In order to maintain control of the area, a number of the conspirators identify themselves a group called "Coke Wave." "Coke Wave" is an organization of individuals including, but not limited to, TRAQUANE DOLSON, MASON MILLIGAN, JALEEL DOLSON,

MICHAEL JACKSON, DEVELLE WILLIAMS, TYREE MANNINGS, SEAN LENNON, and URSULA BERRY are associates of "Coke Wave" who sold narcotics in conjunction and/or with the permission of "Coke Wave" members, and/or provided assistance to members of "Coke Wave."

Members of "Coke Wave" and their associates (1) are the exclusive sellers of narcotics in and around Linden Avenue, City of Middletown, County of Orange, State of New York (2) obtain and deliver narcotics, including cocaine, to customers; (3) protect and store quantities of narcotic drugs and the proceeds from the sale of narcotic drugs; (4) share in the proceeds from the sale of narcotics drugs; (5) provide surveillance of law enforcement on behalf of the members of the conspiracy in and around the City of Middletown, County of Orange, State of New York (6) protect other members of "Coke Wave" against any conflict with rival groups, including but not limited to "Guap Gang," by committing or threatening to commit violent acts and (7) instill fear in others by identifying themselves as "Coke Wave" members in various platforms, including on social media.

One overt act in furtherance of this conspiracy included that on or about April 26, 2018, the defendant, DEVELLE WILLIAMS handed cocaine to another individual in exchange for money.

SECOND COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between April 26, 2018 with having committed the Class B Felony of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully sells a narcotic drug.

To wit: On or about 4/26/18 in the area of Tall Oaks Drive in the City of Middletown, Orange County, New York, the defendant sold a narcotic drug, to wit: cocaine to another person.

THIRD COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between April 26, 2018 with having committed the Class B Felony of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully possesses a narcotic drug with the intent to sell it.

To wit: On or about 4/26/18, in the area of Tall Oaks Drive in the City of Middletown, Orange County, New York, the defendant possessed a narcotic drug, to wit: cocaine with the intent to sell it.

FOURTH COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between May 2, 2018 with having committed the Class B Felony of CRIMINAL SALE OF A

CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully sells a narcotic drug.

To wit: On or about 5/2/18, in the area of Tall Oaks Drive in the City of Middletown, Orange County, New York, the defendant sold a narcotic drug, to wit: cocaine to another person.

FIFTH COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between May 2, 2018 with having committed the Class B Felony of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully possesses a narcotic drug with the intent to sell it.

To wit: On or about 5/2/18, in the area of Tall Oaks Drive in the City of Middletown, Orange County, New York, the defendant possessed a narcotic drug, to wit: cocaine with the intent to sell it.

SIXTH COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between May 9, 2018 with having committed the Class B Felony of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully sells a narcotic drug.

To wit: On or about 5/9/18, in the area of Hanford St. in the City of Middletown, Orange County, New York, the defendant sold a narcotic drug, to wit: cocaine to another person.

SEVENTH COUNT

I further accuse the above-mentioned defendant in this action, and charge that, on or about and in between May 9, 2018 with having committed the Class B Felony of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16, Subdivision 1, of the Penal Law of the State of New York.

A Person is guilty of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE when he knowingly and unlawfully possesses a narcotic drug with the intent to sell it.

To wit: On or about 5/9/18, in the area of Hanford St. in the City of Middletown, Orange County, New York, the defendant possessed a narcotic drug, to wit: cocaine with the intent to sell it.

The above allegations of fact are made by the Complainant herein based upon a police investigation.