

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF QUEENS

-----X  
THE PEOPLE OF THE STATE OF NEW YORK

-against-

QUEENS COUNTY  
INDICTMENT NO.  
72800/24

- X. SATVEER SAINI (a.k.a. "SAV");
- X. MATEO CASTRO-AGUDELO (a.k.a. "MATTPERCZ");
- X. HARGENY FERNANDEZ-GONZALEZ;
- X. ADAM YOUSSEF SENHAJI-RIVAS (a.k.a. "BANDO");
- X. MILANJIT SIDHU

DEFENDANTS.

-----X

**COUNT 1**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI, MATEO CASTRO-AGUDELO, HARGENY FERNANDEZ-GONZALEZ, ADAM YOUSSEF SENHAJI-RIVAS, and MILANJIT SIDHU** of the crime of **CONSPIRACY IN THE FOURTH DEGREE**, in violation of § 105.10(1) of the Penal Law of the State of New York, committed as follows:

On or about and between December 12, 2023 and June 6, 2024 in Queens County, Nassau County, and elsewhere inside and outside the State of New York, including the State of Indiana, with intent that conduct constituting the crime of Criminal Sale of a Firearm in the First Degree, in violation of Section 265.13(2), said crime being a class B felony, be committed, the defendants did knowingly and intentionally agree with each other and with others, known and unknown, to engage in and cause the performance of such conduct as would constitute the above-mentioned class B felony.

## PREAMBLE

It was the purpose of this conspiracy to obtain, assemble, possess, control, sell and transport firearms in Queens County, Nassau County, the State of Indiana, and elsewhere inside and outside the State of New York, and to collect the proceeds from the sale of those firearms.

It was the role of **SATVEER SAINI, MATEO CASTRO-AGUDELO,** and **ADAM YOUSSEF SENHAJI-RIVAS** to obtain, possess, and transport firearms and accessories, and sell firearms and accessories to others.

It was the role of **HARGENY FERNANDEZ-GONZALEZ** to obtain, possess, and transport firearms from Nassau County to Queens County.

It was the role of **SATVEER SAINI, HARGENY FERNANDEZ-GONZALEZ,** and **ADAM YOUSSEF SENHAJI-RIVAS** to transfer funds to purchase and possess firearms from the State of Indiana and to ultimately sell firearms in Queens County.

It was the role of **MILANJIT SIDHU** to obtain, possess, and transport firearms from the State of Indiana to Queens County.

## OVERT ACTS

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

1. On or about December 12, 2023, **HARGENY FERNANDEZ-GONZALEZ** transferred \$3,010 to a co-conspirator, who is known to the Grand Jury.
2. On or about December 16, 2023, in Medina County, Ohio, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** knowingly possessed nine firearms.
3. On or about January 31, 2024, in Queens County, **SATVEER SAINI** sold two ghost gun firearms, magazines, and ammunition, to an individual known to the Grand Jury.

4. On or about February 7, 2024, **SATVEER SAINI** sent the following text message to an individual known to the Grand Jury: “My plugs taking from me 8,000”.
5. On or about February 9, 2024, **MATEO CASTRO-AGUDELO** transported **SATVEER SAINI, HARGENY FERNANDEZ-GONZALEZ**, and a quantity of firearms to the vicinity of 24-47 83<sup>rd</sup> Street in Queens County.
6. On or about February 9, 2024, in Queens County, **SATVEER SAINI** stated to an individual known to the Grand Jury, in sum and substance: “It’s gonna take like at least two weeks, and then on top of that, one more week, because he gotta go to the gun stores and he gotta go get it . . . this is like 12 hours away, in Indiana.”
7. On or about February 19, 2024, **ADAM YOUSSEF SENHAJI-RIVAS** transferred \$2,000 to a co-conspirator, who is known to the Grand Jury.
8. On or about February 19, 2024, **HARGENY FERNANDEZ-GONZALEZ** transferred \$1,000 to a co-conspirator, who is known to the Grand Jury.
9. On or about February 19, 2024, **SATVEER SAINI** transferred \$2,080 to a co-conspirator, who is known to the Grand Jury.
10. On or about February 21, 2024, in Queens County, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** sold six ghost gun firearms, and a quantity of magazines and ammunition to an individual known to the Grand Jury.
11. On or about March 2, 2024, **HARGENY FERNANDEZ-GONZALEZ** transferred \$3,176 to a co-conspirator, who is known to the Grand Jury.
12. On or about March 2, 2024, **SATVEER SAINI** texted a photograph displaying numerous firearms offered for sale to an individual known to the Grand Jury.

13. On or about March 2, 2024, **HARGENY FERNANDEZ-GONZALEZ** transferred \$325 to **MILANJIT SIDHU**.
14. On or about and between March 2, 2024 and March 3, 2024, **MILANJIT SIDHU** transported firearms in a white Honda Accord (Indiana license plate “3SIDHU”) from Indianapolis, Indiana to Queens County, New York.
15. On March 3, 2024, in Queens County, **MILANJIT SIDHU** met with **SATVEER SAINI**, **MATEO CASTRO-AGUDELO**, **HARGENY FERNANDEZ-GONZALEZ**, and **ADAM YOUSSEF SENHAJI-RIVAS**, in order to transfer firearms.
16. On or about March 3, 2024, **HARGENY FERNANDEZ-GONZALEZ** transported firearms into 86-74 106th Street, Queens County.
17. On or about March 3, 2024, **HARGENY FERNANDEZ-GONZALEZ** and **MATEO CASTRO-AGUDELO** transported firearms into 30-04 83rd Street, Queens County.
18. On or about March 7, 2024, **SATVEER SAINI** engaged in a telephone conversation with an individual known to the Grand Jury, wherein **SATVEER SAINI** stated in sum and substance: “Last price I can do, and that’s even coming out of my own stuff, I can go 17-flat.”
19. On or about March 8, 2024, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** sold an assault weapon, two 9-millimeter Glock pistols, and four ghost gun firearms to an individual known to the Grand Jury.
20. On or about March 16, 2024, **HARGENY FERNANDEZ-GONZALEZ** transported ghost gun firearms from Nassau County.

21. On or about March 21, 2024, in Queens County, **MATEO CASTRO-AGUDELO** sold an assault weapon, a 9-millimeter Glock pistol, and five ghost gun firearms to an individual known to the Grand Jury.
22. On or about and between April 12, 2024 and April 13, 2024, **MILANJIT SIDHU** transported firearms in a white Honda Accord (Indiana license plate “3SIDHU”) from Indianapolis, Indiana to Queens County, New York.
23. On or about April 22, 2024, **MATEO CASTRO-AGUDELO** texted an individual known to the Grand Jury a photograph of a guitar case and sent the following message, in pertinent part: “brother get yourself one of these and start learning how to play the guitar / Gut the inside . . . Well just keep swapping them I give you the stuff and I take the empty one / And it make the process easier that way I don’t have to take everything out my bag and put it in yours”.
24. On or about April 24, 2024, **MATEO CASTRO-AGUDELO** sold fourteen firearms to an individual known to the Grand Jury.
25. On or about May 16, 2024, **MATEO CASTRO-AGUDELO**, while carrying a guitar case, exited the garage located at 87-10 56<sup>th</sup> Avenue in Queens County.
26. On or about June 3, 2024, **MATEO CASTRO-AGUDELO** called an individual known to the Grand Jury and stated in sum and substance: “I have five AR-556’s, I have one 9-millimeter foldable, and I have 7 3-Ds.”
27. On or about June 6, 2024, **HARGENY FERNANDEZ-GONZALEZ** and **MATEO CASTRO-AGUDELO**, while carrying a guitar case, exited the garage located at 87-10 56<sup>th</sup> Street in Queens County.

**COUNT 2**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE** in violation of §265.13(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between January 17, 2024 and January 26, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a period of not more than one year, to wit: four 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 405380, 405382, 420928, and 420923).

**COUNT 3**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 17, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: two 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 405380 and 405382).

**COUNT 4**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD**

**DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 17, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405380).

**COUNT 5**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 17, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405380), with intent to sell it.

**COUNT 6**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 17, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405380).

### **COUNT 7**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 17, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405380), and such possession took place outside the defendant's home or place of business.

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

### **COUNT 8**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 17, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405380).



**COUNT 9**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A FIREARM, RIFLE, OR SHOTGUN IN A SENSITIVE LOCATION** in violation of §265.01-e of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 17, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405380), in a sensitive location, inside of the Louis C. Moser Playground, and the defendant knew or reasonably should have known that such location is a sensitive location.

**COUNT 10**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 17, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405382).

**COUNT 11**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF**

**A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 17, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405382), with intent to sell it.

**COUNT 12**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 17, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405382).

**COUNT 13**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 17, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405382), and such possession took place outside the defendant's home or place of business.

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

#### **COUNT 14**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 17, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405382).

#### **COUNT 15**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A FIREARM, RIFLE, OR SHOTGUN IN A SENSITIVE LOCATION** in violation of §265.01-e of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 17, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405382), in a sensitive

location, inside of the Louis C. Moser Playground, and the defendant knew or reasonably should have known that such location is a sensitive location.

### COUNT 16

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 17, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001066805, Invoice Item 6, Lab Item 6.1), with a capacity of more than ten rounds of ammunition.

### COUNT 17

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 17, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001066805, Invoice Item 6, Lab Item 6.1), with a capacity of more than ten rounds of ammunition.

**COUNT 18**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 17, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001066805, Invoice Item 6, Lab Item 6.2), with a capacity of more than ten rounds of ammunition.

**COUNT 19**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 17, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001066805, Invoice Item 6, Lab Item 6.2), with a capacity of more than ten rounds of ammunition.

**COUNT 20**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 26, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: two 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 420928 and 420923).

**COUNT 21**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 26, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420928).

**COUNT 22**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD**

**DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 26, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420928), with intent to sell it.

**COUNT 23**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 26, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420928).

**COUNT 24**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 26, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420928), and such possession took place outside the defendant's home or place of business.

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

**COUNT 25**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 26, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420928).

**COUNT 26**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 26, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420923).

**COUNT 27**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD**



**DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 26, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420923), with intent to sell it.

**COUNT 28**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 26, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420923).

**COUNT 29**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 26, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420923), and such possession took place outside the defendant's home or place of business.

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

**COUNT 30**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 26, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420923).

**COUNT 31**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 26, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001069906, Invoice Item 4, Lab Item 4), with a capacity of more than ten rounds of ammunition.

**COUNT 32**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 26, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001069906, Invoice Item 4, Lab Item 4), with a capacity of more than ten rounds of ammunition.

**COUNT 33**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 26, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001069906, Invoice Item 4, Lab Item 4.1), with a capacity of more than ten rounds of ammunition.

**COUNT 34**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE**

**THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 26, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001069906, Invoice Item 4, Lab Item 4.1), with a capacity of more than ten rounds of ammunition.

**COUNT 35**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 31, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: two 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 420889 and 420873).

**COUNT 36**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 31, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420889).

**COUNT 37**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between January 30, 2024 and January 31, 2024, in Queens County and Nassau County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420889), with intent to sell it.

**COUNT 38**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 31, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420889).

**COUNT 39**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 31, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420889), and such possession took place outside the defendant's home or place of business.

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

**COUNT 40**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between January 30, 2024 and January 31, 2024, in Queens County and Nassau County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420889).

**COUNT 41**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD**

**DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 31, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420873).

**COUNT 42**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between January 30, 2024 and January 31, 2024, in Queens County and Nassau County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420873), with intent to sell it.

**COUNT 43**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 31, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420873).

#### **COUNT 44**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 31, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420873), and such possession took place outside the defendant's home or place of business.

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

#### **COUNT 45**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between January 30, 2024 and January 31, 2024, in Queens County and Nassau County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420873).



**COUNT 46**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 31, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001071448, Invoice Item 4, Lab Item 4), with a capacity of more than ten rounds of ammunition.

**COUNT 47**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 31, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001071448, Invoice Item 4, Lab Item 4), with a capacity of more than ten rounds of ammunition.

**COUNT 48**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD**

**DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 31, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001071448, Invoice Item 4, Lab Item 4.1), with a capacity of more than ten rounds of ammunition.

**COUNT 49**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 31, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001071448, Invoice Item 4, Lab Item 4.1), with a capacity of more than ten rounds of ammunition.

**COUNT 50**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE** in violation of §265.13(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 9, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a period of not more than one year, to wit: four 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 420892, 420887, 420903, and 420883).

**COUNT 51**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 9, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: four 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 420892, 420887, 420903, and 420883).

**COUNT 52**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(5)(i) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 9, 2024, in Queens County, did possess three or more firearms, to wit: four 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 420892, 420887, 420903, and 420883).

**COUNT 53**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 9, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420892).

**COUNT 54**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between February 8, 2024 and February 9, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420892), with intent to sell it.

**COUNT 55**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF**

**A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 9, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420892).

**COUNT 56**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 9, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420892), and such possession took place outside the defendants' homes or places of business.

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

**COUNT 57**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL**

**POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between February 8, 2024 and February 9, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420892).

**COUNT 58**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 9, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420887).

**COUNT 59**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and February 9, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully

possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420887), with intent to sell it.

**COUNT 60**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 9, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420887).

**COUNT 61**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 9, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420887), and such possession took place outside the defendants' homes or places of business.

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

**COUNT 62**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 9, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420887).

**COUNT 63**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 9, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420903).



**COUNT 64**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between February 8, 2024 and February 9, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420903), with intent to sell it.

**COUNT 65**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 9, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420903).

**COUNT 66**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL**

**POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 9, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420903), and such possession took place outside the defendants' homes or places of business.

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

**COUNT 67**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between February 8, 2024 and February 9, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420903).

**COUNT 68**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 9, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420883).

**COUNT 69**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between February 8, 2024 and February 9, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420883), with intent to sell it.

**COUNT 70**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 9, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or

dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420883).

**COUNT 71**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 9, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420883), and such possession took place outside the defendants' homes or places of business.

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

**COUNT 72**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between February 8, 2024 and February 9, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420883).

**COUNT 73**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 9, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001074867, Invoice Item 4, Lab Item 8), with a capacity of more than ten rounds of ammunition.

**COUNT 74**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 9, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001074867, Invoice Item 4, Lab Item 8), with a capacity of more than ten rounds of ammunition.

**COUNT 75**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 9, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001074867, Invoice Item 4, Lab Item 8.1), with a capacity of more than ten rounds of ammunition.

**COUNT 76**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 9, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001074867, Invoice Item 4, Lab Item 8.1), with a capacity of more than ten rounds of ammunition.

**COUNT 77**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 9, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001074873, Invoice Item 4), with a capacity of more than ten rounds of ammunition.

**COUNT 78**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 9, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001074873, Invoice Item 4), with a capacity of more than ten rounds of ammunition.

**COUNT 79**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 9, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001076288, Invoice Item 1), with a capacity of more than ten rounds of ammunition.

**COUNT 80**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 9, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001076288, Invoice Item 1), with a capacity of more than ten rounds of ammunition.



**COUNT 81**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE** in violation of §265.13(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a period of not more than one year, to wit: six 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 405492, 405439, 405436, 405494, 405491, and 405488).

**COUNT 82**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another five or more firearms, to wit: six 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 405492, 405439, 405436, 405494, 405491, and 405488).

**COUNT 83**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: six 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 405492, 405439, 405436, 405494, 405491, and 405488).

**COUNT 84**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, did possess five or more firearms, to wit: six 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 405492, 405439, 405436, 405494, 405491, and 405488).

**COUNT 85**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL**

**POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(5)(i) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, did possess three or more firearms, to wit: six 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 405492, 405439, 405436, 405494, 405491, and 405488).

**COUNT 86**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405492).

**COUNT 87**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully

possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405492), with intent to sell it.

**COUNT 88**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405492).

**COUNT 89**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405492), and such possession took place outside the defendants' homes or places of business.

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

**COUNT 90**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405492).

**COUNT 91**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405439).

**COUNT 92**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405439), with intent to sell it.

**COUNT 93**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405439).

**COUNT 94**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL**

**POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405439), and such possession took place outside the defendants' homes or places of business.

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

**COUNT 95**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405439).

**COUNT 96**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405436).

**COUNT 97**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405436), with intent to sell it.

**COUNT 98**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange,



give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405436).

**COUNT 99**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405436), and such possession took place outside the defendants' homes or places of business.

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

**COUNT 100**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405436).

**COUNT 101**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405494).

**COUNT 102**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405494), with intent to sell it.

**COUNT 103**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL**

**SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405494).

**COUNT 104**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405494), and such possession took place outside the defendants' homes or places of business.

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

**COUNT 105**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL**

**POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405494).

**COUNT 106**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405491).

**COUNT 107**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully

possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405491), with intent to sell it.

**COUNT 108**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405491).

**COUNT 109**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405491), and such possession took place outside the defendants' homes or places of business.

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

**COUNT 110**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405491).

**COUNT 111**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405488).

**COUNT 112**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405488), with intent to sell it.

**COUNT 113**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405488).

**COUNT 114**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL**

**POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405488), and such possession took place outside the defendants' homes or places of business.

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

**COUNT 115**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405488).

**COUNT 116**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:



Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001078475, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

**COUNT 117**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001078475, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

**COUNT 118**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device,

to wit: a 9-millimeter magazine (NYPD Invoice No. 4001078511, Invoice Item 3, Lab Item 15), with a capacity of more than ten rounds of ammunition.

**COUNT 119**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001078511, Invoice Item 3, Lab Item 15), with a capacity of more than ten rounds of ammunition.

**COUNT 120**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001078511, Invoice Item 3, Lab Item 15.1), with a capacity of more than ten rounds of ammunition.

**COUNT 121**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001078511, Invoice Item 3, Lab Item 15.1), with a capacity of more than ten rounds of ammunition.

**COUNT 122**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001078511, Invoice Item 4), with a capacity of more than ten rounds of ammunition.

**COUNT 123**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 21, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001078511, Invoice Item 4), with a capacity of more than ten rounds of ammunition.

**COUNT 124**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE** in violation of §265.13(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 3, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a period of not more than one year, to wit: one .300-caliber Aero Precision pistol (Serial No. X144070), two 9-millimeter Glock pistols (Serial Nos. WCD778 and BYNF993), one 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956), one 22 Long Rifle caliber Glock pistol (Serial No. 21US2470), and one 9-millimeter SCCY CPX-2 pistol (Serial No. 842883).

**COUNT 125**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 3, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another five or more firearms, to wit: one .300-caliber Aero Precision pistol (Serial No. X144070), two 9-millimeter Glock pistols (Serial Nos. WCD778 and BYNF993), one 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956), one 22 Long Rifle caliber Glock pistol (Serial No. 21US2470), and one 9-millimeter SCCY CPX-2 pistol (Serial No. 842883).

**COUNT 126**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 3, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: one .300-caliber Aero Precision pistol (Serial No. X144070), two 9-millimeter Glock pistols (Serial Nos. WCD778 and BYNF993), one 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956), one 22 Long Rifle caliber Glock pistol (Serial No. 21US2470), and one 9-millimeter SCCY CPX-2 pistol (Serial No. 842883).

**COUNT 127**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **MANUFACTURE, TRANSPORT, DISPOSITION AND DEFACEMENT OF WEAPONS AND DANGEROUS INSTRUMENTS AND APPLIANCES**, in violation of Section 265.10(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, did transport or ship as merchandise five or more firearms, to wit: one .300-caliber Aero Precision pistol (Serial No. X144070), two 9-millimeter Glock pistols (Serial Nos. WCD778 and BYNF993), one 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956), one 22 Long Rifle caliber Glock pistol (Serial No. 21US2470), and one 9-millimeter SCCY CPX-2 pistol (Serial No. 842883).

**COUNT 128**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, did possess five or more firearms, to wit: one .300-caliber Aero Precision pistol (Serial No. X144070), two 9-millimeter Glock pistols (Serial Nos. WCD778 and BYNF993), one 5.56x45mm caliber Palmetto

State Armory pistol (Serial No. SCD710956), one 22 Long Rifle caliber Glock pistol (Serial No. 21US2470), and one 9-millimeter SCCY CPX-2 pistol (Serial No. 842883).

**COUNT 129**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(5)(i) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, did possess three or more firearms, to wit: one .300-caliber Aero Precision pistol (Serial No. X144070), two 9-millimeter Glock pistols (Serial Nos. WCD778 and BYNF993), one 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956), one 22 Long Rifle caliber Glock pistol (Serial No. 21US2470), and one 9-millimeter SCCY CPX-2 pistol (Serial No. 842883).

**COUNT 130**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 3, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a .300-caliber Aero Precision pistol (Serial No. X144070).

**COUNT 131**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a .300-caliber Aero Precision pistol (Serial No. X144070), with intent to sell it.

**COUNT 132**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **MANUFACTURE, TRANSPORT, DISPOSITION AND DEFACEMENT OF WEAPONS AND DANGEROUS INSTRUMENTS AND APPLIANCES**, in violation of Section 265.10(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, did transport or ship an assault weapon, to wit: a .300-caliber Aero Precision pistol (Serial No. X144070), which has the following assault weapon characteristics: a semi-automatic pistol that has an ability to accept a detachable magazine with the capacity to accept an ammunition magazine that attaches to the pistol outside of the pistol grip, a threaded barrel capable of accepting a barrel extender, flash suppressor, forward handgrip or silencer, and a shroud that is attached to, or partially or



completely encircles, the barrel and that permits the shooter to hold the firearms with the non-trigger hand without being burned.

**COUNT 133**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, did possess an assault weapon, to wit: a .300-caliber Aero Precision pistol (Serial No. X144070), which has the following assault weapon characteristics: a semi-automatic pistol that has an ability to accept a detachable magazine with the capacity to accept an ammunition magazine that attaches to the pistol outside of the pistol grip, a threaded barrel capable of accepting a barrel extender, flash suppressor, forward handgrip or silencer, and a shroud that is attached to, or partially or completely encircles, the barrel and that permits the shooter to hold the firearms with the non-trigger hand without being burned.

**COUNT 134**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, did possess a firearm, to wit: a .300-caliber Aero Precision pistol (Serial No. X144070).

**COUNT 135**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 3, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock pistol (Serial No. WCD778).

**COUNT 136**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock pistol (Serial No. WCD778), with intent to sell it.

**COUNT 137**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, did possess a firearm, to wit: a 9-millimeter Glock pistol (Serial No. WCD778).

**COUNT 138**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 3, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock pistol (Serial No. BYNF993).

**COUNT 139**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock pistol (Serial No. BYNF993), with intent to sell it.

**COUNT 140**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, did possess a firearm, to wit: a 9-millimeter Glock pistol (Serial No. BYNF993).

**COUNT 141**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 3, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956).

**COUNT 142**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956), with intent to sell it.

**COUNT 143**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **MANUFACTURE, TRANSPORT, DISPOSITION AND DEFACEMENT OF WEAPONS AND DANGEROUS INSTRUMENTS AND APPLIANCES**, in violation of Section 265.10(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, did transport or ship an assault weapon, to wit: a 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956), which has the following assault weapon characteristics: a semi-automatic pistol that has an ability to accept a detachable magazine with the capacity to accept an ammunition magazine that attaches to the pistol outside of the pistol grip, a threaded barrel capable of accepting a barrel extender, flash suppressor, forward handgrip or silencer, and a shroud that is attached to, or

partially or completely encircles, the barrel and that permits the shooter to hold the firearms with the non-trigger hand without being burned.

**COUNT 144**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, did possess an assault weapon, to wit: a 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956), which has the following assault weapon characteristics: a semi-automatic pistol that has an ability to accept a detachable magazine with the capacity to accept an ammunition magazine that attaches to the pistol outside of the pistol grip, a threaded barrel capable of accepting a barrel extender, flash suppressor, forward handgrip or silencer, and a shroud that is attached to, or partially or completely encircles, the barrel and that permits the shooter to hold the firearms with the non-trigger hand without being burned.

**COUNT 145**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, did possess a firearm, to wit: a 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956).

**COUNT 146**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 3, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: 22 Long Rifle caliber Glock pistol (Serial No. 21US2470).

**COUNT 147**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: 22 Long Rifle caliber Glock pistol (Serial No. 21US2470), with intent to sell it.

**COUNT 148**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, did possess a firearm, to wit: 22 Long Rifle caliber Glock pistol (Serial No. 21US2470).

**COUNT 149**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 3, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter SCCY CPX-2 pistol (Serial No. 842883).

**COUNT 150**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:



Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter SCCY CPX-2 pistol (Serial No. 842883), with intent to sell it.

**COUNT 151**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, did possess a firearm, to wit: a 9-millimeter SCCY CPX-2 pistol (Serial No. 842883).

**COUNT 152**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 3, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a .300 caliber magazine (NYPD Invoice No. 4001083581, Invoice Item 2), with a capacity of more than ten rounds of ammunition.

**COUNT 153**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **MANUFACTURE, TRANSPORT, DISPOSITION AND DEFACEMENT OF WEAPONS AND DANGEROUS INSTRUMENTS AND APPLIANCES**, in violation of Section 265.10(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, did transport or ship a large capacity ammunition feeding device, to wit: a .300 caliber magazine (NYPD Invoice No. 4001083581, Invoice Item 2), with a capacity of more than ten rounds of ammunition.

**COUNT 154**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, did possess a large capacity ammunition feeding device, to wit: a .300 caliber magazine (NYPD Invoice No. 4001083581, Invoice Item 2), with a capacity of more than ten rounds of ammunition.

**COUNT 155**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE** in violation of §265.13(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a period of not more than one year, to wit: one .300-caliber Aero Precision pistol (Serial No. X144070), two 9-millimeter Glock pistols (Serial Nos. WCD778 and BYNF993), and four 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743835, 743802, 743854, and 743813).

**COUNT 156**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another five or more firearms, to wit: one .300-caliber Aero Precision pistol (Serial No. X144070), two 9-millimeter Glock pistols (Serial Nos. WCD778 and BYNF993), and four 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743835, 743802, 743854, and 743813).

**COUNT 157**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: one .300-caliber Aero Precision pistol (Serial No. X144070), two 9-millimeter Glock pistols (Serial Nos. WCD778 and BYNF993), and four 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743835, 743802, 743854, and 743813).

**COUNT 158**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, did possess five or more firearms, to wit: one .300-caliber Aero Precision pistol (Serial No. X144070), two 9-millimeter Glock pistols (Serial Nos. WCD778 and BYNF993), and four 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743835, 743802, 743854, and 743813).

**COUNT 159**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI, MATEO CASTRO-AGUDELO, HARGENY FERNANDEZ-GONZALEZ** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(5)(i) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between March 3, 2024 and March 8, 2024, in Queens County, did possess three or more firearms, to wit: one .300-caliber Aero Precision pistol (Serial No. X144070), and two 9-millimeter Glock pistols (Serial Nos. WCD778 and BYNF993).

**COUNT 160**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a .300-caliber Aero Precision pistol (Serial No. X144070).

**COUNT 161**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI, MATEO CASTRO-AGUDELO, HARGENY FERNANDEZ-GONZALEZ** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between March 3, 2024 and March 8, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a .300-caliber Aero Precision pistol (Serial No. X144070), with intent to sell it.

**COUNT 162**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI, MATEO CASTRO-AGUDELO, HARGENY FERNANDEZ-GONZALEZ** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between March 3, 2024 and March 8, 2024, in Queens County, did possess an assault weapon, to wit: a .300-caliber Aero Precision pistol (Serial No. X144070), which has the following assault weapon characteristics: a semi-automatic pistol that has an ability to accept a detachable magazine with the capacity to accept an ammunition magazine that attaches to the pistol outside of the pistol grip, a threaded barrel capable of accepting a barrel extender, flash suppressor, forward handgrip or

silencer, and a shroud that is attached to, or partially or completely encircles, the barrel and that permits the shooter to hold the firearms with the non-trigger hand without being burned.

**COUNT 163**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI, MATEO CASTRO-AGUDELO, HARGENY FERNANDEZ-GONZALEZ** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between March 3, 2024 and March 8, 2024, in Queens County, did possess a firearm, to wit: a .300-caliber Aero Precision pistol (Serial No. X144070).

**COUNT 164**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock pistol (Serial No. WCD778).

**COUNT 165**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI, MATEO CASTRO-AGUDELO, HARGENY FERNANDEZ-GONZALEZ** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between March 3, 2024 and March 8, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock pistol (Serial No. WCD778), with intent to sell it.

**COUNT 166**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock pistol (Serial No. WCD778), and such possession took place outside the defendants' homes or places of business.

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



**COUNT 167**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI, MATEO CASTRO-AGUDELO, HARGENY FERNANDEZ-GONZALEZ** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between March 3, 2024 and March 8, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock pistol (Serial No. WCD778).

**COUNT 168**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock pistol (Serial No. BYNF993).

**COUNT 169**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI, MATEO CASTRO-AGUDELO, HARGENY FERNANDEZ-GONZALEZ** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE**

**OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between March 3, 2024 and March 8, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock pistol (Serial No. BYNF993), with intent to sell it.

**COUNT 170**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock pistol (Serial No. BYNF993), and such possession took place outside the defendants' homes or places of business.

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

**COUNT 171**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI**, **MATEO CASTRO-AGUDELO**, **HARGENY FERNANDEZ-GONZALEZ** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL**

**POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between March 3, 2024 and March 8, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock pistol (Serial No. BYNF993).

**COUNT 172**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743835).

**COUNT 173**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully

possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743835), with intent to sell it.

**COUNT 174**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743835).

**COUNT 175**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743835), and such possession took place outside the defendants' homes or places of business.

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

**COUNT 176**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743835).

**COUNT 177**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743802).

**COUNT 178**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743802), with intent to sell it.

**COUNT 179**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743802).

**COUNT 180**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL**

**POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743802), and such possession took place outside the defendants' homes or places of business.

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

**COUNT 181**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743802).

**COUNT 182**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743854).

**COUNT 183**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743854), with intent to sell it.

**COUNT 184**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or



dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743854).

**COUNT 185**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743854), and such possession took place outside the defendants' homes or places of business.

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

**COUNT 186**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743854).

**COUNT 187**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743813).

**COUNT 188**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743813), with intent to sell it.

**COUNT 189**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF**

**A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743813).

**COUNT 190**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743813), and such possession took place outside the defendants' homes or places of business.

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

**COUNT 191**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL**

**POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743813).

**COUNT 192**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a .300 caliber magazine (NYPD Invoice No. 4001083581, Invoice Item 2), with a capacity of more than ten rounds of ammunition.

**COUNT 193**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI, MATEO CASTRO-AGUDELO, HARGENY FERNANDEZ-GONZALEZ** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between March 3, 2024 and March 8, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a .300 caliber magazine (NYPD Invoice No. 4001083581, Invoice Item 2), with a capacity of more than ten rounds of ammunition.

**COUNT 194**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001083583, Invoice Item 3, Lab Item 6), with a capacity of more than ten rounds of ammunition.

**COUNT 195**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter

magazine (NYPD Invoice No. 4001083583, Invoice Item 3, Lab Item 6), with a capacity of more than ten rounds of ammunition.

**COUNT 196**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001083583, Invoice Item 3, Lab Item 6.1), with a capacity of more than ten rounds of ammunition.

**COUNT 197**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001083583, Invoice Item 3, Lab Item 6.1), with a capacity of more than ten rounds of ammunition.

**COUNT 198**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001083588, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

**COUNT 199**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001083588, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

**COUNT 200**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001083588, Invoice Item 4), with a capacity of more than ten rounds of ammunition.

**COUNT 201**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001083588, Invoice Item 4), with a capacity of more than ten rounds of ammunition.



**COUNT 202**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001083592, Invoice Item 2), with a capacity of more than ten rounds of ammunition.

**COUNT 203**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001083592, Invoice Item 2), with a capacity of more than ten rounds of ammunition.

**COUNT 204**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001083592, Invoice Item 5), with a capacity of more than ten rounds of ammunition.

**COUNT 205**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 8, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001083592, Invoice Item 5), with a capacity of more than ten rounds of ammunition.

**COUNT 206**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE** in violation of §265.13(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a period of not more than one year, to wit: one 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956), four 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 439525, 743883, 743858, and 743824), one 22 Long Rifle caliber Glock pistol (Serial No. 21US2470), and one 9-millimeter SCCY CPX-2 pistol (Serial No. 842883).

**COUNT 207**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another five or more firearms, to wit: one 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956), four 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 439525, 743883, 743858, and 743824), one 22 Long Rifle caliber Glock pistol (Serial No. 21US2470), and one 9-millimeter SCCY CPX-2 pistol (Serial No. 842883).

**COUNT 208**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: one 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956), four 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 439525, 743883, 743858, and 743824), one 22 Long Rifle caliber Glock pistol (Serial No. 21US2470), and one 9-millimeter SCCY CPX-2 pistol (Serial No. 842883).

**COUNT 209**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, did possess five or more firearms, to wit: one 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956), four 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 439525, 743883, 743858, and 743824), one 22 Long Rifle caliber Glock pistol (Serial No. 21US2470), and one 9-millimeter SCCY CPX-2 pistol (Serial No. 842883).

**COUNT 210**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI, HARGENY FERNANDEZ-GONZALEZ** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(5)(i) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between March 3, 2024 and March 14, 2024, in Queens County, did possess three or more firearms, to wit: one 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956), one 22 Long Rifle caliber Glock pistol (Serial No. 21US2470), and one 9-millimeter SCCY CPX-2 pistol (Serial No. 842883).

**COUNT 211**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956).

**COUNT 212**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI, HARGENY FERNANDEZ-GONZALEZ** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between March 3, 2024 and March 14, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956).

**COUNT 213**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956), and such possession took place outside the defendant's home or place of business.

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

### **COUNT 214**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI, HARGENY FERNANDEZ-GONZALEZ** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between March 3, 2024 and March 14, 2024, in Queens County, did possess an assault weapon, to wit: a 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956), which has the following assault weapon characteristics: a semi-automatic pistol that has an ability to accept a detachable magazine with the capacity to accept an ammunition magazine that attaches to the pistol outside of the pistol grip, a threaded barrel capable of accepting a barrel extender, flash suppressor, forward handgrip or silencer, and a shroud that is attached to, or partially or completely encircles, the barrel and that permits the shooter to hold the firearms with the non-trigger hand without being burned.

### **COUNT 215**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI, HARGENY FERNANDEZ-GONZALEZ** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between March 3, 2024 and March 14, 2024, in Queens County, did possess a firearm, to wit: a 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956).

**COUNT 216**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439525).

**COUNT 217**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439525), with intent to sell it.

**COUNT 218**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND**



**DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439525).

**COUNT 219**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439525), and such possession took place outside the defendant's home or place of business.

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

**COUNT 220**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439525).

**COUNT 221**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743883).

**COUNT 222**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743883), with intent to sell it.

**COUNT 223**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND**

**DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743883).

**COUNT 224**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743883), and such possession took place outside the defendant's home or place of business.

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

**COUNT 225**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743883).

**COUNT 226**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743858).

**COUNT 227**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743858), with intent to sell it.

**COUNT 228**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND**

**DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743858).

**COUNT 229**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743858), and such possession took place outside the defendant's home or place of business.

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

**COUNT 230**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743858).

**COUNT 231**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743824).

**COUNT 232**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743824), with intent to sell it.

**COUNT 233**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND**

**DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743824).

**COUNT 234**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743824), and such possession took place outside the defendant's home or place of business.

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

**COUNT 235**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743824).

**COUNT 236**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 22 Long Rifle caliber Glock pistol (Serial No. 21US2470).

**COUNT 237**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI, HARGENY FERNANDEZ-GONZALEZ** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between March 3, 2024 and March 14, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 22 Long Rifle caliber Glock pistol (Serial No. 21US2470), with intent to sell it.

**COUNT 238**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE**



**SECOND DEGREE** in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, did possess a loaded firearm, to wit: a 22 Long Rifle caliber Glock pistol (Serial No. 21US2470), and such possession took place outside the defendant's home or place of business.

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

**COUNT 239**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI, HARGENY FERNANDEZ-GONZALEZ** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between March 3, 2024 and March 14, 2024, in Queens County, did possess a firearm, to wit: a 22 Long Rifle caliber Glock pistol (Serial No. 21US2470).

**COUNT 240**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter SCCY CPX-2 pistol (Serial No. 842883).

**COUNT 241**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI, HARGENY FERNANDEZ-GONZALEZ** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between March 3, 2024 and March 14, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter SCCY CPX-2 pistol (Serial No. 842883), with intent to sell it.

**COUNT 242**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter SCCY CPX-2 pistol (Serial No. 842883), and such possession took place outside the defendant's home or place of business.

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

**COUNT 243**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI, HARGENY FERNANDEZ-GONZALEZ** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between March 3, 2024 and March 14, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter SCCY CPX-2 pistol (Serial No. 842883).

**COUNT 244**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 5.56x45mm caliber magazine (NYPD Invoice No. 4001085400, Item 2), with a capacity of more than ten rounds of ammunition.

**COUNT 245**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 5.56x45mm caliber magazine (NYPD Invoice No. 4001085400, Item 2), with a capacity of more than ten rounds of ammunition.

**COUNT 246**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001085403, Item 3, Lab Item 21), with a capacity of more than ten rounds of ammunition.

**COUNT 247**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE**

**THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001085403, Item 3, Lab Item 21), with a capacity of more than ten rounds of ammunition.

**COUNT 248**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001085403, Item 3, Lab Item 21.1), with a capacity of more than ten rounds of ammunition.

**COUNT 249**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001085403, Item 3, Lab Item 21.1), with a capacity of more than ten rounds of ammunition.

### **COUNT 250**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001085409, Item 3, Lab Item 3), with a capacity of more than ten rounds of ammunition.

### **COUNT 251**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001085409, Item 3, Lab Item 3), with a capacity of more than ten rounds of ammunition.

**COUNT 252**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001085409, Item 3, Lab Item 3.1), with a capacity of more than ten rounds of ammunition.

**COUNT 253**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001085409, Item 3, Lab Item 3.1), with a capacity of more than ten rounds of ammunition.

**COUNT 254**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE**

**FIRST DEGREE** in violation of §265.13(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a period of not more than one year, to wit: one 5.56x45mm caliber American Tactical rifle (Serial No. NS003684), one 9-millimeter Glock pistol (Serial No. BPMB999), and five 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743839, 743869, 743855, 439496, and 439456).

**COUNT 255**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another five or more firearms, to wit: one 5.56x45mm caliber American Tactical rifle (Serial No. NS003684), one 9-millimeter Glock pistol (Serial No. BPMB999), and five 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743839, 743869, 743855, 439496, and 439456).

**COUNT 256**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE**



**SECOND DEGREE** in violation of §265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: one 5.56x45mm caliber American Tactical rifle (Serial No. NS003684), one 9-millimeter Glock pistol (Serial No. BPMB999), and five 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743839, 743869, 743855, 439496, and 439456).

**COUNT 257**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **HARGENY FERNANDEZ-GONZALEZ** of the crime of **MANUFACTURE, TRANSPORT, DISPOSITION AND DEFACEMENT OF WEAPONS AND DANGEROUS INSTRUMENTS AND APPLIANCES**, in violation of Section 265.10(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 16, 2024, in Queens County and Nassau County, did transport or ship as merchandise five or more firearms, to wit: five 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743839, 743869, 743855, 439496, and 439456).

**COUNT 258**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of

**CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between March 16, 2024 and March 21, 2024, in Queens County and Nassau County, did possess five or more firearms, to wit: five 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743839, 743869, 743855, 439496, and 439456).

**COUNT 259**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(5)(i) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between March 16, 2024 and March 21, 2024, in Queens County and Nassau County, did possess three or more firearms, to wit: five 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743839, 743869, 743855, 439496, and 439456).

**COUNT 260**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 5.56x45mm caliber American Tactical rifle (Serial No. NS003684).

**COUNT 261**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 5.56x45mm caliber American Tactical rifle (Serial No. NS003684).

**COUNT 262**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 5.56x45mm caliber American Tactical rifle (Serial No. NS003684), and such possession took place outside the defendant's home or place of business.

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

**COUNT 263**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did possess an assault weapon, to wit: a 5.56x45mm caliber American Tactical rifle (Serial No. NS003684), which has the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, and has a telescoping stock, a pistol grip that protrudes conspicuously beneath the action of the weapon, a second handgrip that can be held by the non-trigger hand, and a flash suppressor, muzzle brake, muzzle compensator, or threaded barrel designed to accommodate a flash suppressor, muzzle brake, or muzzle compensator.

**COUNT 264**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did possess a firearm, to wit: a 5.56x45mm caliber American Tactical rifle (Serial No. NS003684).

**COUNT 265**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE**

**THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock pistol (Serial No. BPMB999).

**COUNT 266**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock pistol (Serial No. BPMB999), with intent to sell it.

**COUNT 267**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock pistol (Serial No. BPMB999), and such possession took place outside the defendant's home or place of business.

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

**COUNT 268**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock pistol (Serial No. BPMB999).

**COUNT 269**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743839).

**COUNT 270**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of

**CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between March 16, 2024 and March 21, 2024, in Queens County and Nassau County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743839), with intent to sell it.

**COUNT 271**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743839).

**COUNT 272**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743839), and such possession took place outside the defendant's home or place of business.

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

**COUNT 273**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between March 16, 2024 and March 21, 2024, in Queens County and Nassau County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743839).

**COUNT 274**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another



person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743869).

**COUNT 275**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between March 16, 2024 and March 21, 2024, in Queens County and Nassau County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743869), with intent to sell it.

**COUNT 276**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743869).

**COUNT 277**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743869), and such possession took place outside the defendant's home or place of business.

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

**COUNT 278**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between March 16, 2024 and March 21, 2024, in Queens County and Nassau County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743869).

**COUNT 279**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE**

**THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743855).

**COUNT 280**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between March 16, 2024 and March 21, 2024, in Queens County and Nassau County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743855), with intent to sell it.

**COUNT 281**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743855).

**COUNT 282**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743855), and such possession took place outside the defendant's home or place of business.

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

**COUNT 283**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between March 16, 2024 and March 21, 2024, in Queens County and Nassau County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743855).

**COUNT 284**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439496).

**COUNT 285**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between March 16, 2024 and March 21, 2024, in Queens County and Nassau County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439496), with intent to sell it.

**COUNT 286**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN**

**THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439496).

**COUNT 287**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439496), and such possession took place outside the defendant's home or place of business.

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

**COUNT 288**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between March 16, 2024 and March 21, 2024, in Queens County and Nassau County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439496).

**COUNT 289**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439456).

**COUNT 290**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between March 16, 2024 and March 21, 2024, in Queens County and Nassau County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439456), with intent to sell it.

**COUNT 291**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439456).

**COUNT 292**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439456), and such possession took place outside the defendant's home or place of business.

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

**COUNT 293**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of



**CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between March 16, 2024 and March 21, 2024, in Queens County and Nassau County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439456).

**COUNT 294**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001087777, Invoice Item 3, Lab Item 7), with a capacity of more than ten rounds of ammunition.

**COUNT 295**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001087777, Invoice Item 3, Lab Item 7), with a capacity of more than ten rounds of ammunition.

**COUNT 296**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001087777, Invoice Item 3, Lab Item 7.1), with a capacity of more than ten rounds of ammunition.

**COUNT 297**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001087777, Invoice Item 3, Lab Item 7.1), with a capacity of more than ten rounds of ammunition.

**COUNT 298**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 5.56x45mm magazine (NYPD Invoice No. 4001087780, Invoice Item 2), with a capacity of more than ten rounds of ammunition.

**COUNT 299**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, did possess a large capacity ammunition feeding device, to wit: a 5.56x45mm magazine (NYPD Invoice No. 4001087780, Invoice Item 2), with a capacity of more than ten rounds of ammunition.

**COUNT 300**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE**

**THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001087781, Invoice Item 4, Lab Item 4), with a capacity of more than ten rounds of ammunition.

**COUNT 301**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001087781, Invoice Item 4, Lab Item 4), with a capacity of more than ten rounds of ammunition.

**COUNT 302**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001087781, Invoice Item 4, Lab Item 4.1), with a capacity of more than ten rounds of ammunition.

**COUNT 303**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001087781, Invoice Item 4, Lab Item 4.1), with a capacity of more than ten rounds of ammunition.

**COUNT 304**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD

Invoice No. 4001087789, Invoice Item 3, Lab Item 11), with a capacity of more than ten rounds of ammunition.

**COUNT 305**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001087789, Invoice Item 3, Lab Item 11), with a capacity of more than ten rounds of ammunition.

**COUNT 306**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001087789, Invoice Item 3, Lab Item 11.1), with a capacity of more than ten rounds of ammunition.

**COUNT 307**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001087789, Invoice Item 3, Lab Item 11.1), with a capacity of more than ten rounds of ammunition.

**COUNT 308**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE** in violation of §265.13(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a period of not more than one year, to wit: six 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743852, 439459, 420836, 743814, 743834, and 439453).

**COUNT 309**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE**

**SECOND DEGREE** in violation of §265.12(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another five or more firearms, to wit: six 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743852, 439459, 420836, 743814, 743834, and 439453).

**COUNT 310**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: six 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743852, 439459, 420836, 743814, 743834, and 439453).

**COUNT 311**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(2) of the Penal Law of the State of New York, committed as follows:



Said defendant, on or about April 12, 2024, in Queens County, did possess five or more firearms, to wit: six 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743852, 439459, 420836, 743814, 743834, and 439453).

**COUNT 312**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(5)(i) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess three or more firearms, to wit: six 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743852, 439459, 420836, 743814, 743834, and 439453).

**COUNT 313**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743852).

**COUNT 314**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743852), with intent to sell it.

**COUNT 315**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743852).

**COUNT 316**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743852), and such possession took place outside the defendant's home or place of business.

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

### **COUNT 317**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743852).

### **COUNT 318**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439459).

**COUNT 319**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439459), with intent to sell it.

**COUNT 320**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439459).

**COUNT 321**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439459), and such possession took place outside the defendant's home or place of business.

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

### **COUNT 322**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439459).

### **COUNT 323**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420836).

**COUNT 324**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420836), with intent to sell it.

**COUNT 325**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420836).

**COUNT 326**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420836), and such possession took place outside the defendant's home or place of business.

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

### **COUNT 327**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420836).

### **COUNT 328**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743814).

**COUNT 329**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743814), with intent to sell it.

**COUNT 330**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743814).

**COUNT 331**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:



Said defendant, on or about April 12, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743814), and such possession took place outside the defendant's home or place of business.

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

### **COUNT 332**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743814).

### **COUNT 333**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743834).

**COUNT 334**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743834), with intent to sell it.

**COUNT 335**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743834).

**COUNT 336**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743834), and such possession took place outside the defendant's home or place of business.

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

### **COUNT 337**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743834).

### **COUNT 338**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439453).

**COUNT 339**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439453), with intent to sell it.

**COUNT 340**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439453).

**COUNT 341**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439453), and such possession took place outside the defendant's home or place of business.

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

### **COUNT 342**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439453).

### **COUNT 343**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001094378, Invoice Item 3, Lab Item 3.1), with a capacity of more than ten rounds of ammunition.

**COUNT 344**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001094378, Invoice Item 3, Lab Item 3.1), with a capacity of more than ten rounds of ammunition.

**COUNT 345**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001094378, Invoice Item 3, Lab Item 3.2), with a capacity of more than ten rounds of ammunition.

**COUNT 346**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON**

**IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001094378, Invoice Item 3, Lab Item 3.2), with a capacity of more than ten rounds of ammunition.

**COUNT 347**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001094379, Invoice Item 2, Lab Item 6), with a capacity of more than ten rounds of ammunition.

**COUNT 348**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001094379, Invoice Item 2, Lab Item 6), with a capacity of more than ten rounds of ammunition.

**COUNT 349**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001094379, Invoice Item 2, Lab Item 6.1), with a capacity of more than ten rounds of ammunition.

**COUNT 350**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001094379, Invoice Item 2, Lab Item 6.1), with a capacity of more than ten rounds of ammunition.



**COUNT 351**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001094381, Invoice Item 3, Lab Item 10.1), with a capacity of more than ten rounds of ammunition.

**COUNT 352**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001094381, Invoice Item 3, Lab Item 10.1), with a capacity of more than ten rounds of ammunition.

**COUNT 353**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE**

**THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001094381, Invoice Item 3, Lab Item 10.2), with a capacity of more than ten rounds of ammunition.

**COUNT 354**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001094381, Invoice Item 3, Lab Item 10.2), with a capacity of more than ten rounds of ammunition.

**COUNT 355**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001094391, Invoice Item 2), with a capacity of more than ten rounds of ammunition.

**COUNT 356**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001094391, Invoice Item 2), with a capacity of more than ten rounds of ammunition.

**COUNT 357**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE** in violation of §265.13(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another ten or more firearms, to wit: one 9-millimeter Smith & Wesson pistol (Serial No. RBY0146), two 40-caliber Glock pistols (Serial Nos. BUZF831 and AANC987), one 10-millimeter Glock pistol (Serial No. BYVX500), one 9-millimeter Glock pistol

(Serial No. BPZP868), one 380-caliber Glock pistol (Serial No. AKGX329), and eight 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743894, 743805, 743820, 743878, 743817, 743840, 743836 and 743808).

**COUNT 358**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE** in violation of §265.13(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a period of not more than one year, to wit: one 9-millimeter Smith & Wesson pistol (Serial No. RBY0146), two 40-caliber Glock pistols (Serial Nos. BUZF831 and AANC987), one 10-millimeter Glock pistol (Serial No. BYVX500), one 9-millimeter Glock pistol (Serial No. BPZP868), one 380-caliber Glock pistol (Serial No. AKGX329), and eight 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743894, 743805, 743820, 743878, 743817, 743840, 743836 and 743808).

**COUNT 359**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another five or more firearms, to wit: one 9-millimeter Smith & Wesson pistol (Serial No. RBY0146), two 40-caliber Glock pistols (Serial Nos. BUZF831 and AANC987), one 10-millimeter Glock pistol (Serial No. BYVX500), one 9-millimeter Glock pistol (Serial No. BPZP868), one 380-caliber Glock pistol (Serial No. AKGX329), and eight 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743894, 743805, 743820, 743878, 743817, 743840, 743836 and 743808).

**COUNT 360**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: one 9-millimeter Smith & Wesson pistol (Serial No. RBY0146), two 40-caliber Glock pistols (Serial Nos. BUZF831 and AANC987), one 10-millimeter Glock pistol (Serial No. BYVX500), one 9-millimeter Glock pistol (Serial No. BPZP868), one 380-caliber Glock pistol (Serial No. AKGX329), and eight 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743894, 743805, 743820, 743878, 743817, 743840, 743836 and 743808).

**COUNT 361**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE FIRST DEGREE** in violation of §265.04(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess ten or more firearms, to wit: one 9-millimeter Smith & Wesson pistol (Serial No. RBY0146), two 40-caliber Glock pistols (Serial Nos. BUZF831 and AANC987), one 10-millimeter Glock pistol (Serial No. BYVX500), one 9-millimeter Glock pistol (Serial No. BPZP868), one 380-caliber Glock pistol (Serial No. AKGX329), and eight 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743894, 743805, 743820, 743878, 743817, 743840, 743836 and 743808).

**COUNT 362**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess five or more firearms, to wit: one 9-millimeter Smith & Wesson pistol (Serial No. RBY0146), two 40-caliber Glock pistols (Serial Nos. BUZF831 and AANC987), one 10-millimeter Glock pistol (Serial No. BYVX500), one 9-millimeter Glock pistol (Serial No. BPZP868), one 380-caliber Glock pistol (Serial No. AKGX329), and eight 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743894, 743805, 743820, 743878, 743817, 743840, 743836 and 743808).

**COUNT 363**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(5)(i) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess three or more firearms, to wit: one 9-millimeter Smith & Wesson pistol (Serial No. RBY0146), two 40-caliber Glock pistols (Serial Nos. BUZF831 and AANC987), one 10-millimeter Glock pistol (Serial No. BYVX500), one 9-millimeter Glock pistol (Serial No. BPZP868), one 380-caliber Glock pistol (Serial No. AKGX329), and eight 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743894, 743805, 743820, 743878, 743817, 743840, 743836 and 743808).

**COUNT 364**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Smith & Wesson pistol (Serial No. RBY0146).

**COUNT 365**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Smith & Wesson pistol (Serial No. RBY0146), with intent to sell it.

**COUNT 366**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Smith & Wesson pistol (Serial No. RBY0146), and such possession took place outside the defendant's home or place of business.

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

**COUNT 367**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:



Said defendant, on or about April 24, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Smith & Wesson pistol (Serial No. RBY0146).

**COUNT 368**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 40-caliber Glock pistol (Serial No. BUZF831).

**COUNT 369**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 40-caliber Glock pistol (Serial No. BUZF831), with intent to sell it.

**COUNT 370**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a firearm, to wit: a 40-caliber Glock pistol (Serial No. BUZF831).

**COUNT 371**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 40-caliber Glock pistol (Serial No. AANC987).

**COUNT 372**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 40-caliber Glock pistol (Serial No. AANC987), with intent to sell it.

**COUNT 373**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a firearm, to wit: a 40-caliber Glock pistol (Serial No. AANC987).

**COUNT 374**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 10-millimeter Glock pistol (Serial No. BYVX500).

**COUNT 375**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE**

**THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 10-millimeter Glock pistol (Serial No. BYVX500), with intent to sell it.

**COUNT 376**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a firearm, to wit: a 10-millimeter Glock pistol (Serial No. BYVX500).

**COUNT 377**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock pistol (Serial No. BPZP868).

**COUNT 378**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock pistol (Serial No. BPZP868), with intent to sell it.

**COUNT 379**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock pistol (Serial No. BPZP868), and such possession took place outside the defendant's home or place of business.

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

**COUNT 380**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock pistol (Serial No. BPZP868).

**COUNT 381**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a .380-caliber Glock pistol (Serial No. AKGX329).

**COUNT 382**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a .380-caliber Glock pistol (Serial No. AKGX329), with intent to sell it.

**COUNT 383**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a firearm, to wit: a .380-caliber Glock pistol (Serial No. AKGX329).

**COUNT 384**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743894).

**COUNT 385**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743894), with intent to sell it.

**COUNT 386**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743894).

**COUNT 387**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:



Said defendant, on or about April 24, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743894), and such possession took place outside the defendant's home or place of business.

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

### **COUNT 388**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743894).

### **COUNT 389**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743805).

**COUNT 390**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743805), with intent to sell it.

**COUNT 391**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743805).

**COUNT 392**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743805), and such possession took place outside the defendant's home or place of business.

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

### **COUNT 393**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743805).

### **COUNT 394**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743820).

**COUNT 395**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743820), with intent to sell it.

**COUNT 396**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743820).

**COUNT 397**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743820), and such possession took place outside the defendant's home or place of business.

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

### **COUNT 398**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743820).

### **COUNT 399**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743878).

**COUNT 400**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743878), with intent to sell it.

**COUNT 401**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743878).

**COUNT 402**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743878), and such possession took place outside the defendant's home or place of business.

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

#### **COUNT 403**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743878).

#### **COUNT 404**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743817).

**COUNT 405**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743817), with intent to sell it.

**COUNT 406**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743817).

**COUNT 407**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:



Said defendant, on or about April 24, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743817), and such possession took place outside the defendant's home or place of business.

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

**COUNT 408**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743817).

**COUNT 409**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743840).

**COUNT 410**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743840), with intent to sell it.

**COUNT 411**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743840).

**COUNT 412**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743840), and such possession took place outside the defendant's home or place of business.

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

#### **COUNT 413**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743840).

#### **COUNT 414**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743836).

**COUNT 415**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743836), with intent to sell it.

**COUNT 416**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743836).

**COUNT 417**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743836), and such possession took place outside the defendant's home or place of business.

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

#### **COUNT 418**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743836).

#### **COUNT 419**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743808).

**COUNT 420**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743808), with intent to sell it.

**COUNT 421**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743808).

**COUNT 422**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743808), and such possession took place outside the defendant's home or place of business.

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

#### **COUNT 423**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743808).

#### **COUNT 424**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098178, Invoice Item 2), with a capacity of more than ten rounds of ammunition.

**COUNT 425**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098178, Invoice Item 2), with a capacity of more than ten rounds of ammunition.

**COUNT 426**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098178, Invoice Item 4), with a capacity of more than ten rounds of ammunition.

**COUNT 427**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON**



**IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098178, Invoice Item 4), with a capacity of more than ten rounds of ammunition.

**COUNT 428**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098184, Invoice Item 3, Lab Item 31.1), with a capacity of more than ten rounds of ammunition.

**COUNT 429**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098184, Invoice Item 3, Lab Item 31.1), with a capacity of more than ten rounds of ammunition.

**COUNT 430**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098184, Invoice Item 3, Lab Item 31.2), with a capacity of more than ten rounds of ammunition.

**COUNT 431**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098184, Invoice Item 3, Lab Item 31.2), with a capacity of more than ten rounds of ammunition.

**COUNT 432**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098189, Invoice Item 4), with a capacity of more than ten rounds of ammunition.

**COUNT 433**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098189, Invoice Item 4), with a capacity of more than ten rounds of ammunition.

**COUNT 434**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE**

**THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098193, Invoice Item 3, Lab Item 22.1), with a capacity of more than ten rounds of ammunition.

**COUNT 435**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098193, Invoice Item 3, Lab Item 22.1), with a capacity of more than ten rounds of ammunition.

**COUNT 436**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098193, Invoice Item 3, Lab Item 22.2), with a capacity of more than ten rounds of ammunition.

**COUNT 437**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098193, Invoice Item 3, Lab Item 22.2), with a capacity of more than ten rounds of ammunition.

**COUNT 438**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD

Invoice No. 4001098195, Invoice Item 3, Lab Item 7.1), with a capacity of more than ten rounds of ammunition.

**COUNT 439**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098195, Invoice Item 3, Lab Item 7.1) with a capacity of more than ten rounds of ammunition.

**COUNT 440**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098195, Invoice Item 3, Lab Item 7.2), with a capacity of more than ten rounds of ammunition.

**COUNT 441**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098195, Invoice Item 3, Lab Item 7.2), with a capacity of more than ten rounds of ammunition.

**COUNT 442**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098198, Invoice Item 3, Lab Item 16.1), with a capacity of more than ten rounds of ammunition.

**COUNT 443**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON**

**IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098198, Invoice Item 3, Lab Item 16.1) with a capacity of more than ten rounds of ammunition.

**COUNT 444**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098198, Invoice Item 3, Lab Item 16.2), with a capacity of more than ten rounds of ammunition.

**COUNT 445**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:



Said defendant, on or about April 24, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098198, Invoice Item 3, Lab Item 16.2), with a capacity of more than ten rounds of ammunition.

**COUNT 446**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098198, Invoice Item 5, Lab Item 18.1), with a capacity of more than ten rounds of ammunition.

**COUNT 447**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098198, Invoice Item 5, Lab Item 18.1), with a capacity of more than ten rounds of ammunition.

**COUNT 448**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098198, Invoice Item 5, Lab Item 18.2), with a capacity of more than ten rounds of ammunition.

**COUNT 449**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098198, Invoice Item 5, Lab Item 18.2), with a capacity of more than ten rounds of ammunition.

**COUNT 450**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE**

**THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098198, Invoice Item 5, Lab Item 18.3), with a capacity of more than ten rounds of ammunition.

**COUNT 451**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098198, Invoice Item 5, Lab Item 18.3), with a capacity of more than ten rounds of ammunition.

**COUNT 452**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098198, Invoice Item 5, Lab Item 18.4), with a capacity of more than ten rounds of ammunition.

**COUNT 453**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098198, Invoice Item 5, Lab Item 18.4), with a capacity of more than ten rounds of ammunition.

**COUNT 454**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another

person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098198, Invoice Item 6), with a capacity of more than ten rounds of ammunition.

**COUNT 455**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098198, Invoice Item 6), with a capacity of more than ten rounds of ammunition.

**COUNT 456**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE** in violation of §265.13(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a period of not more than one year, to wit: one .22-caliber Smith & Wesson M&P15-22 rifle (Serial No. DFF5588), one 5.56x45-millimeter Del-Ton DTI-15 rifle (Serial No. DTI-S296961), two 7.62x39-millimeter Century Arms VSKA pistols (Serial Nos. SV7P012825 and SV7P009899), and one .22-caliber Heckler & Koch MP5 rifle (Serial No. HD023068).

**COUNT 457**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another five or more firearms, to wit: one .22-caliber Smith & Wesson M&P15-22 rifle (Serial No. DFF5588), one 5.56x45-millimeter Del-Ton DTI-15 rifle (Serial No. DTI-S296961), two 7.62x39-millimeter Century Arms VSKA pistols (Serial Nos. SV7P012825 and SV7P009899), and one .22-caliber Heckler & Koch MP5 rifle (Serial No. HD023068).

**COUNT 458**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: one .22-caliber Smith & Wesson M&P15-22 rifle (Serial No. DFF5588), one 5.56x45-millimeter Del-Ton DTI-15 rifle (Serial No. DTI-S296961), two 7.62x39-millimeter Century Arms VSKA pistols (Serial Nos. SV7P012825 and SV7P009899), and one .22-caliber Heckler & Koch MP5 rifle (Serial No. HD023068).

**COUNT 459**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess five or more firearms, to wit: one .22-caliber Smith & Wesson M&P15-22 rifle (Serial No. DFF5588), one 5.56x45-millimeter Del-Ton DTI-15 rifle (Serial No. DTI-S296961), two 7.62x39-millimeter Century Arms VSKA pistols (Serial Nos. SV7P012825 and SV7P009899), one .22-caliber Heckler & Koch MP5 rifle (Serial No. HD023068).

**COUNT 460**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(5)(i) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess three or more firearms, to wit: one .22-caliber Smith & Wesson M&P15-22 rifle (Serial No. DFF5588), one 5.56x45-millimeter Del-Ton DTI-15 rifle (Serial No. DTI-S296961), two 7.62x39-millimeter Century Arms VSKA pistols (Serial Nos. SV7P012825 and SV7P009899), and one .22-caliber Heckler & Koch MP5 rifle (Serial No. HD023068).

**COUNT 461**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a .22-caliber Smith & Wesson M&P15-22 rifle (Serial No. DFF5588).

**COUNT 462**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a .22-caliber Smith & Wesson M&P15-22 rifle (Serial No. DFF5588), with intent to sell it.

**COUNT 463**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:



Said defendant, on or about April 26, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded .22-caliber Smith & Wesson M&P15-22 rifle (Serial No. DFF5588), and such possession took place outside the defendant's home or place of business.

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

#### **COUNT 464**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess an assault weapon, to wit: a .22-caliber Smith & Wesson M&P15-22 rifle (Serial No. DFF5588), which has the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, and has a telescoping stock, a pistol grip that protrudes conspicuously beneath the action of the weapon, and a threaded barrel with a muzzle compensator.

#### **COUNT 465**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess a firearm, to wit: a .22-caliber Smith & Wesson M&P15-22 rifle (Serial No. DFF5588).

**COUNT 466**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 5.56x45-millimeter Del-Ton DTI-15 rifle (Serial No. DTI-S296961).

**COUNT 467**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 5.56x45-millimeter Del-Ton DTI-15 rifle (Serial No. DTI-S296961), with intent to sell it.

**COUNT 468**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 5.56x45-millimeter Del-Ton DTI-15 rifle (Serial No. DTI-S296961), and such possession took place outside the defendant's home or place of business.

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

#### **COUNT 469**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess an assault weapon, to wit: a 5.56x45-millimeter Del-Ton DTI-15 rifle (Serial No. DTI-S296961), which has the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, and has a telescoping stock, a pistol grip that protrudes conspicuously beneath the action of the weapon, and a threaded barrel with a muzzle compensator.

#### **COUNT 470**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess a firearm, to wit: a 5.56x45-millimeter Del-Ton DTI-15 rifle (Serial No. DTI-S296961).

**COUNT 471**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 7.62x39-millimeter Century Arms VSKA pistol (Serial No. SV7P012825).

**COUNT 472**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 7.62x39-millimeter Century Arms VSKA pistol (Serial No. SV7P012825), with intent to sell it.

**COUNT 473**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON**

**IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 7.62x39-millimeter Century Arms VSKA pistol (Serial No. SV7P012825), and such possession took place outside the defendant's home or place of business.

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

**COUNT 474**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess an assault weapon, to wit: a 7.62x39-millimeter Century Arms VSKA pistol (Serial No. SV7P012825), which has the following assault weapon characteristics: a semi-automatic pistol that has an ability to accept a detachable magazine, has a second handgrip that can be held by the non-trigger hand, has a capacity to accept an ammunition magazine that attaches to the pistol outside of the pistol grip, and has a threaded barrel with a flash suppressor.

**COUNT 475**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess a firearm, to wit: a 7.62x39-millimeter Century Arms VSKA pistol (Serial No. SV7P012825).

**COUNT 476**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 7.62x39-millimeter Century Arms VSKA pistol (Serial No. SV7P009899).

**COUNT 477**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 7.62x39-millimeter Century Arms VSKA pistol (Serial No. SV7P009899), with intent to sell it.

**COUNT 478**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 7.62x39-millimeter Century Arms VSKA pistol (Serial No. SV7P009899), and such possession took place outside the defendant's home or place of business.

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

**COUNT 479**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess an assault weapon, to wit: a 7.62x39-millimeter Century Arms VSKA pistol (Serial No. SV7P009899), which has the following assault weapon characteristics: a semi-automatic pistol that has an ability to accept a detachable magazine, has a second handgrip that can be held by the non-trigger hand, has a capacity to accept an ammunition magazine that attaches to the pistol outside of the pistol grip, and has a threaded barrel with a flash suppressor.

**COUNT 480**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess a firearm, to wit: a 7.62x39-millimeter Century Arms VSKA pistol (Serial No. SV7P009899).

**COUNT 481**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a .22-caliber Heckler & Koch MP5 rifle (Serial No. HD023068).

**COUNT 482**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:



Said defendant, on or about April 26, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a .22-caliber Heckler & Koch MP5 rifle (Serial No. HD023068), with intent to sell it.

### **COUNT 483**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded .22-caliber Heckler & Koch MP5 rifle (Serial No. HD023068), and such possession took place outside the defendant's home or place of business.

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

### **COUNT 484**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess an assault weapon, to wit: a .22-caliber Heckler & Koch MP5 rifle (Serial No. HD023068), which has the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, a capacity to accept an ammunition magazine that attaches to the pistol

outside of the pistol grip, a threaded barrel capable of accepting a flash suppressor, and a shroud that partially encircles the barrel and that permits the shooter to hold the firearms with the non-trigger hand without being burned.

**COUNT 485**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess a firearm, to wit: a .22-caliber Heckler & Koch MP5 rifle (Serial No. HD023068).

**COUNT 486**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a .22-caliber magazine (NYPD Invoice No. 4001098907, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

**COUNT 487**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON**

**IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a .22-caliber magazine (NYPD Invoice No. 4001098907, Invoice Item 3) with a capacity of more than ten rounds of ammunition.

**COUNT 488**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 5.56x45mm caliber magazine (NYPD Invoice No. 4001098907, Invoice Item 4), with a capacity of more than ten rounds of ammunition.

**COUNT 489**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 5.56x45mm caliber magazine (NYPD Invoice No. 4001098907, Invoice Item 4), with a capacity of more than ten rounds of ammunition.

**COUNT 490**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 7.62x39mm magazine (NYPD Invoice No. 4001098908, Invoice Item 3, Lab Item 6.1), with a capacity of more than ten rounds of ammunition.

**COUNT 491**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 7.62x39mm magazine (NYPD Invoice No. 4001098908, Invoice Item 3, Lab Item 6.1) with a capacity of more than ten rounds of ammunition.

**COUNT 492**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 7.62x39mm magazine (NYPD Invoice No. 4001098908, Invoice Item 3, Lab Item 6.2), with a capacity of more than ten rounds of ammunition.

**COUNT 493**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 7.62x39mm magazine (NYPD Invoice No. 4001098908, Invoice Item 3, Lab Item 6.2), with a capacity of more than ten rounds of ammunition.

**COUNT 494**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE**

**THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a .22-caliber magazine (NYPD Invoice No. 4001098912, Invoice Item 2), with a capacity of more than ten rounds of ammunition.

**COUNT 495**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a .22-caliber magazine (NYPD Invoice No. 4001098912, Invoice Item 2) with a capacity of more than ten rounds of ammunition.

**COUNT 496**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE** in violation of §265.13(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a

period of not more than one year, to wit: one .22-caliber Mauser M-15 rifle (Serial No. B116411), one 9-millimeter CZ Scorpion EVO 3 S1 Carbine rifle (Serial No. F287155), one 9-millimeter Masterpiece Arms MPA30SST pistol (Serial No. FX50459), one 9-millimeter Intratec AB-10 pistol (Serial No. A043521), and one 9-millimeter AREX Rex Zero 1T pistol (Serial No. GZ15997).

**COUNT 497**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another five or more firearms, to wit: one .22-caliber Mauser M-15 rifle (Serial No. B116411), one 9-millimeter CZ Scorpion EVO 3 S1 Carbine rifle (Serial No. F287155), one 9-millimeter Masterpiece Arms MPA30SST pistol (Serial No. FX50459), one 9-millimeter Intratec AB-10 pistol (Serial No. A043521), and one 9-millimeter AREX Rex Zero 1T pistol (Serial No. GZ15997).

**COUNT 498**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: one .22-caliber Mauser M-15 rifle (Serial No. B116411), one 9-millimeter CZ Scorpion EVO 3 S1 Carbine rifle (Serial No. F287155), one 9-millimeter Masterpiece Arms MPA30SST pistol (Serial No. FX50459), one 9-millimeter Intratec AB-10 pistol (Serial No. A043521), and one 9-millimeter AREX Rex Zero 1T pistol (Serial No. GZ15997).

#### **COUNT 499**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess five or more firearms, to wit: one .22-caliber Mauser M-15 rifle (Serial No. B116411), one 9-millimeter CZ Scorpion EVO 3 S1 Carbine rifle (Serial No. F287155), one 9-millimeter Masterpiece Arms MPA30SST pistol (Serial No. FX50459), one 9-millimeter Intratec AB-10 pistol (Serial No. A043521), and one 9-millimeter AREX Rex Zero 1T pistol (Serial No. GZ15997).

#### **COUNT 500**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON**



**IN THE THIRD DEGREE** in violation of §265.02(5)(i) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess three or more firearms, to wit: one .22-caliber Mauser M-15 rifle (Serial No. B116411), one 9-millimeter CZ Scorpion EVO 3 S1 Carbine rifle (Serial No. F287155), one 9-millimeter Masterpiece Arms MPA30SST pistol (Serial No. FX50459), one 9-millimeter Intratec AB-10 pistol (Serial No. A043521), and one 9-millimeter AREX Rex Zero 1T pistol (Serial No. GZ15997).

**COUNT 501**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a .22-caliber Mauser M-15 rifle (Serial No. B116411).

**COUNT 502**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a .22-caliber Mauser M-15 rifle (Serial No. B116411), with intent to sell it.

**COUNT 503**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded .22-caliber Mauser M-15 rifle (Serial No. B116411), and such possession took place outside the defendant's home or place of business.

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

**COUNT 504**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess an assault weapon, to wit: a .22-caliber Mauser M-15 rifle (Serial No. B116411), which has the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable

magazine, and has a folding, telescoping stock, a pistol grip that protrudes conspicuously beneath the action of the weapon, and a threaded barrel.

**COUNT 505**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess a firearm, to wit: a .22-caliber Mauser M-15 rifle (Serial No. B116411).

**COUNT 506**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter CZ Scorpion EVO 3 S1 Carbine rifle (Serial No. F287155).

**COUNT 507**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter CZ Scorpion EVO 3 S1 Carbine rifle (Serial No. F287155), with intent to sell it.

**COUNT 508**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter CZ Scorpion EVO 3 S1 Carbine rifle (Serial No. F287155), and such possession took place outside the defendant's home or place of business.

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

**COUNT 509**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess an assault weapon, to wit: a 9-millimeter CZ Scorpion EVO 3 S1 Carbine rifle (Serial No. F287155), which has the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept

a detachable magazine, and has a folding, telescoping stock, a pistol grip that protrudes conspicuously beneath the action of the weapon, and a threaded barrel.

**COUNT 510**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter CZ Scorpion EVO 3 S1 Carbine rifle (Serial No. F287155).

**COUNT 511**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Masterpiece Arms MPA30SST pistol (Serial No. FX50459).

**COUNT 512**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE**

**THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Masterpiece Arms MPA30SST pistol (Serial No. FX50459), with intent to sell it.

**COUNT 513**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Masterpiece Arms MPA30SST pistol (Serial No. FX50459), and such possession took place outside the defendant's home or place of business.

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

**COUNT 514**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess an assault weapon, to wit: a 9-millimeter Masterpiece Arms MPA30SST pistol (Serial No. FX50459), which

has the following assault weapon characteristics: a semi-automatic pistol that has an ability to accept a detachable magazine, and has threaded barrel capable of accepting a barrel extender.

**COUNT 515**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Masterpiece Arms MPA30SST pistol (Serial No. FX50459).

**COUNT 516**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter Intratec AB-10 pistol (Serial No. A043521).

**COUNT 517**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE**

**THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Intratec AB-10 pistol (Serial No. A043521), with intent to sell it.

**COUNT 518**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Intratec AB-10 pistol (Serial No. A043521), and such possession took place outside the defendant's home or place of business.

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

**COUNT 519**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess an assault weapon, to wit: a 9-millimeter Intratec AB-10 pistol (Serial No. A043521), which has the



following assault weapon characteristics: a semi-automatic pistol that has an ability to accept a detachable magazine, and the capacity to accept an ammunition magazine that attaches to the pistol outside of the pistol grip.

**COUNT 520**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Intratec AB-10 pistol (Serial No. A043521).

**COUNT 521**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: a 9-millimeter AREX Rex Zero 1T pistol (Serial No. GZ15997).

**COUNT 522**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE**

**THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter AREX Rex Zero 1T pistol (Serial No. GZ15997), with intent to sell it.

**COUNT 523**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter AREX Rex Zero 1T pistol (Serial No. GZ15997), and such possession took place outside the defendant's home or place of business.

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

**COUNT 524**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess an assault weapon, to wit: a 9-millimeter AREX Rex Zero 1T pistol (Serial No. GZ15997), which has the

following assault weapon characteristics: a semi-automatic pistol that has an ability to accept a detachable magazine, and has a threaded barrel.

**COUNT 525**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter AREX Rex Zero 1T pistol (Serial No. GZ15997).

**COUNT 526**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a .22-caliber magazine (NYPD Invoice No. 4001105461, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

**COUNT 527**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON**

**IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a .22-caliber magazine (NYPD Invoice No. 4001105461, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

**COUNT 528**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001105461, Invoice Item 7), with a capacity of more than ten rounds of ammunition.

**COUNT 529**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001105461, Invoice Item 7), with a capacity of more than ten rounds of ammunition.

**COUNT 530**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001105464, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

**COUNT 531**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001105464, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

**COUNT 532**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001105464, Invoice Item 6), with a capacity of more than ten rounds of ammunition.

**COUNT 533**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001105464, Invoice Item 6), with a capacity of more than ten rounds of ammunition.

**COUNT 534**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE**

**THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001105475, Invoice Item 2, Lab Item 2.1), with a capacity of more than ten rounds of ammunition.

**COUNT 535**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001105475, Invoice Item 2, Lab Item 2.1), with a capacity of more than ten rounds of ammunition.

**COUNT 536**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001105475, Invoice Item 2, Lab Item 2.2), with a capacity of more than ten rounds of ammunition.

**COUNT 537**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001105475, Invoice Item 2, Lab Item 2.2), with a capacity of more than ten rounds of ammunition.

**COUNT 538**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **ATTEMPTED CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE** in violation of §110.00 / 265.13(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about June 6, 2024, in Queens County, did attempt to unlawfully sell, exchange, give or dispose of to another ten or more firearms, to wit: seven 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743847, 743865, 743872, 743861, 743803, 439487,



and 453204), one 9-millimeter Smith & Wesson rifle (Serial No. RSS0326), one .300 caliber American Tactical MilSport pistol (Serial No. MSA085429), one 5.56x45mm caliber American Tactical Omni Hybrid pistol (Serial No. NS240729), one 5.56x45mm caliber Ruger AR-556 pistol (Serial No. 857-67436), and one 5.56x45mm caliber Delton DTI-15 rifle (Serial # DTI-S296959).

**COUNT 539**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **ATTEMPTED CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE** in violation of §110.00 / 265.13(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about June 6, 2024, in Queens County, did attempt to unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a period of not more than one year, to wit: seven 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743847, 743865, 743872, 743861, 743803, 439487, and 453204), one 9-millimeter Smith & Wesson rifle (Serial No. RSS0326), one .300 caliber American Tactical MilSport pistol (Serial No. MSA085429), one 5.56x45mm caliber American Tactical Omni Hybrid pistol (Serial No. NS240729), one 5.56x45mm caliber Ruger AR-556 pistol (Serial No. 857-67436), and one 5.56x45mm caliber Delton DTI-15 rifle (Serial # DTI-S296959).

**COUNT 540**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **ATTEMPTED CRIMINAL SALE OF A**

**FIREARM IN THE SECOND DEGREE** in violation of §110.00 / 265.12(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about June 6, 2024, in Queens County, did attempt to unlawfully sell, exchange, give or dispose of to another five or more firearms, to wit: seven 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743847, 743865, 743872, 743861, 743803, 439487, and 453204), one 9-millimeter Smith & Wesson rifle (Serial No. RSS0326), one .300 caliber American Tactical MilSport pistol (Serial No. MSA085429), one 5.56x45mm caliber American Tactical Omni Hybrid pistol (Serial No. NS240729), one 5.56x45mm caliber Ruger AR-556 pistol (Serial No. 857-67436), and one 5.56x45mm caliber Delton DTI-15 rifle (Serial # DTI-S296959).

**COUNT 541**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **ATTEMPTED CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about June 6, 2024, in Queens County, did attempt to unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: seven 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743847, 743865, 743872, 743861, 743803, 439487, and 453204), one 9-millimeter Smith & Wesson rifle (Serial No. RSS0326), one .300 caliber American Tactical MilSport pistol (Serial No. MSA085429), one 5.56x45mm caliber American Tactical Omni Hybrid pistol (Serial No. NS240729), one 5.56x45mm caliber Ruger AR-556 pistol (Serial No. 857-67436), and one 5.56x45mm caliber Delton DTI-15 rifle (Serial # DTI-S296959).

**COUNT 542**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE FIRST DEGREE** in violation of §265.04(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess ten or more firearms, to wit: seven 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743847, 743865, 743872, 743861, 743803, 439487, and 453204), one 9-millimeter Smith & Wesson rifle (Serial No. RSS0326), one .300 caliber American Tactical MilSport pistol (Serial No. MSA085429), one 5.56x45mm caliber American Tactical Omni Hybrid pistol (Serial No. NS240729), one 5.56x45mm caliber Ruger AR-556 pistol (Serial No. 857-67436), and one 5.56x45mm caliber Delton DTI-15 rifle (Serial # DTI-S296959).

**COUNT 543**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess five or more firearms, to wit: seven 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743847, 743865, 743872, 743861, 743803, 439487, and 453204), one 9-millimeter Smith & Wesson rifle (Serial No. RSS0326), one .300 caliber American Tactical MilSport pistol (Serial No. MSA085429), one 5.56x45mm caliber American Tactical Omni

Hybrid pistol (Serial No. NS240729), one 5.56x45mm caliber Ruger AR-556 pistol (Serial No. 857-67436), and one 5.56x45mm caliber Delton DTI-15 rifle (Serial # DTI-S296959).

**COUNT 544**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(5)(i) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess three or more firearms, to wit: seven 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743847, 743865, 743872, 743861, 743803, 439487, and 453204), one 9-millimeter Smith & Wesson rifle (Serial No. RSS0326), one .300 caliber American Tactical MilSport pistol (Serial No. MSA085429), one 5.56x45mm caliber American Tactical Omni Hybrid pistol (Serial No. NS240729), one 5.56x45mm caliber Ruger AR-556 pistol (Serial No. 857-67436), and one 5.56x45mm caliber Delton DTI-15 rifle (Serial # DTI-S296959).

**COUNT 545**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a

firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743847), with intent to sell it.

**COUNT 546**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743847), and such possession took place outside the defendants' homes or places of business.

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

**COUNT 547**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743847).

**COUNT 548**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743865), with intent to sell it.

**COUNT 549**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743865), and such possession took place outside the defendants' homes or places of business.

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

**COUNT 550**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743865).

**COUNT 551**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743872), with intent to sell it.

**COUNT 552**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of

**CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743872).

**COUNT 553**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743861), with intent to sell it.

**COUNT 554**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:



Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743861).

**COUNT 555**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743803), with intent to sell it.

**COUNT 556**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743803), and such possession took place outside the defendants' homes or places of business.

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

**COUNT 557**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743803).

**COUNT 558**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439487), with intent to sell it.

**COUNT 559**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439487), and such possession took place outside the defendants' homes or places of business.

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

**COUNT 560**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439487).

**COUNT 561**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 453204), with intent to sell it.

**COUNT 562**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 453204), and such possession took place outside the defendants' homes or places of business.

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

**COUNT 563**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 453204).

**COUNT 564**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Smith & Wesson rifle (Serial No. RSS0326), with intent to sell it.

**COUNT 565**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Smith & Wesson rifle (Serial No. RSS0326), and such possession took place outside the defendants' homes or places of business.

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

**COUNT 566**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Smith & Wesson rifle (Serial No. RSS0326).

**COUNT 567**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a

firearm, to wit: a .300 caliber American Tactical MilSport pistol (Serial No. MSA085429), with intent to sell it.

**COUNT 568**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess an assault weapon, to wit: a .300 caliber American Tactical MilSport pistol (Serial No. MSA085429), which has the following assault weapon characteristics: a semi-automatic pistol that has an ability to accept a detachable magazine with the capacity to accept an ammunition magazine that attaches to the pistol outside of the pistol grip, a threaded barrel capable of accepting a barrel extender, flash suppressor, forward handgrip or silencer, and a shroud that is attached to, or partially or completely encircles, the barrel and that permits the shooter to hold the firearms with the non-trigger hand without being burned.

**COUNT 569**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a firearm, to wit: a .300 caliber American Tactical MilSport pistol (Serial No. MSA085429).

**COUNT 570**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 5.56x45mm caliber American Tactical Omni Hybrid pistol (Serial No. NS240729), with intent to sell it.

**COUNT 571**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 5.56x45mm caliber American Tactical Omni Hybrid pistol (Serial No. NS240729), and such possession took place outside the defendants' homes or places of business.



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

**COUNT 572**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess an assault weapon, to wit: a 5.56x45mm caliber American Tactical Omni Hybrid pistol (Serial No. NS240729), which has the following assault weapon characteristics: a semi-automatic pistol that has an ability to accept a detachable magazine with the capacity to accept an ammunition magazine that attaches to the pistol outside of the pistol grip, a threaded barrel capable of accepting a barrel extender, flash suppressor, forward handgrip or silencer, and a shroud that is attached to, or partially or completely encircles, the barrel and that permits the shooter to hold the firearms with the non-trigger hand without being burned.

**COUNT 573**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a firearm, to wit: a 5.56x45mm caliber American Tactical Omni Hybrid pistol (Serial No. NS240729).

**COUNT 574**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 5.56x45mm caliber Ruger AR-556 pistol (Serial No. 857-67436), with intent to sell it.

**COUNT 575**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 5.56x45mm caliber Ruger AR-556 pistol (Serial No. 857-67436), and such possession took place outside the defendants' homes or places of business.

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

**COUNT 576**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess an assault weapon, to wit: a 5.56x45mm caliber Ruger AR-556 pistol (Serial No. 857-67436), which has the following assault weapon characteristics: a semi-automatic pistol that has an ability to accept a detachable magazine, and has a telescoping brace, a capacity to accept an ammunition magazine that attaches to the pistol outside of the pistol grip, and a shroud that is attached to, or partially or completely encircles, the barrel and that permits the shooter to hold the firearms with the non-trigger hand without being burned.

**COUNT 577**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a firearm, to wit: a 5.56x45mm caliber Ruger AR-556 pistol (Serial No. 857-67436).

**COUNT 578**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 5.56x45mm caliber Delton DTI-15 rifle (Serial # DTI-S296959), with intent to sell it.

**COUNT 579**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 5.56x45mm caliber Delton DTI-15 rifle (Serial # DTI-S296959), and such possession took place outside the defendants' homes or places of business.

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

**COUNT 580**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess an assault weapon, to wit: a 5.56x45mm caliber Delton DTI-15 rifle (Serial # DTI-S296959), which has the following assault weapon characteristics: a semi-automatic pistol that has an ability to accept a detachable magazine, and has a telescoping stock, a pistol grip that protrudes conspicuously beneath the action of the weapon, and a muzzle compensator, or threaded barrel designed to accommodate a flash suppressor, muzzle brake, or muzzle compensator.

**COUNT 581**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a firearm, to wit: a 5.56x45mm caliber Delton DTI-15 rifle (Serial # DTI-S296959).

**COUNT 582**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **ATTEMPTED CRIMINAL SALE OF A**

**FIREARM IN THE THIRD DEGREE** in violation of §110.00 / 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did attempt to unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112882, Invoice Item 3, Lab Item 13.1), with a capacity of more than ten rounds of ammunition.

**COUNT 583**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112882, Invoice Item 3, Lab Item 13.1), with a capacity of more than ten rounds of ammunition.

**COUNT 584**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** the crime of **ATTEMPTED CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §110.00 / 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did attempt to unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112882, Invoice Item 3, Lab Item 13.2), with a capacity of more than ten rounds of ammunition.

**COUNT 585**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112882, Invoice Item 3, Lab Item 13.2), with a capacity of more than ten rounds of ammunition.

**COUNT 586**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **ATTEMPTED CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §110.00 / 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did attempt to unlawfully sell, exchange, give or dispose of to another

person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112890, Invoice Item 3, Lab Item 17.1), with a capacity of more than ten rounds of ammunition.

**COUNT 587**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112890, Invoice Item 3, Lab Item 17.1), with a capacity of more than ten rounds of ammunition.

**COUNT 588**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** the crime of **ATTEMPTED CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §110.00 / 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did attempt to unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD



Invoice No. 4001112890, Invoice Item 3, Lab Item 17.2), with a capacity of more than ten rounds of ammunition.

**COUNT 589**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112890, Invoice Item 3, Lab Item 17.2), with a capacity of more than ten rounds of ammunition.

**COUNT 590**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **ATTEMPTED CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §110.00 / 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did attempt to unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112893, Invoice Item 3, Lab Item 20.1), with a capacity of more than ten rounds of ammunition.

**COUNT 591**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112893, Invoice Item 3, Lab Item 20.1), with a capacity of more than ten rounds of ammunition.

**COUNT 592**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** the crime of **ATTEMPTED CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §110.00 / 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did attempt to unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112893, Invoice Item 3, Lab Item 20.2), with a capacity of more than ten rounds of ammunition.

**COUNT 593**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112893, Invoice Item 3, Lab Item 20.2), with a capacity of more than ten rounds of ammunition.

**COUNT 594**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **ATTEMPTED CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §110.00 / 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did attempt to unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112902, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

**COUNT 595**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of

**CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112902, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

**COUNT 596**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** the crime of **ATTEMPTED CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §110.00 / 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did attempt to unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112902, Invoice Item 4), with a capacity of more than ten rounds of ammunition.

**COUNT 597**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112902, Invoice Item 4), with a capacity of more than ten rounds of ammunition.

**COUNT 598**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **ATTEMPTED CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §110.00 / 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did attempt to unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 5.56x45mm caliber magazine (NYPD Invoice No. 4001112888, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

**COUNT 599**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 5.56x45mm caliber

magazine (NYPD Invoice No. 4001112888, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

**COUNT 600**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** the crime of **ATTEMPTED CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §110.00 / 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did attempt to unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 5.56x45mm caliber magazine (NYPD Invoice No. 4001112888, Invoice Item 4), with a capacity of more than ten rounds of ammunition.

**COUNT 601**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 5.56x45mm caliber magazine (NYPD Invoice No. 4001112888, Invoice Item 4), with a capacity of more than ten rounds of ammunition.

**COUNT 602**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **ATTEMPTED CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §110.00 / 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did attempt to unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 5.56x45mm caliber magazine (NYPD Invoice No. 4001112955, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

**COUNT 603**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 5.56x45mm caliber magazine (NYPD Invoice No. 4001112955, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

**COUNT 604**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** the crime of **ATTEMPTED CRIMINAL SALE OF A**

**FIREARM IN THE THIRD DEGREE** in violation of §110.00 / 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did attempt to unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 5.56x45mm caliber magazine (NYPD Invoice No. 4001112955, Invoice Item 5), with a capacity of more than ten rounds of ammunition.

**COUNT 605**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 5.56x45mm caliber magazine (NYPD Invoice No. 4001112955, Invoice Item 5), with a capacity of more than ten rounds of ammunition.

**COUNT 606**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:



Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess an assault weapon, to wit: a 9-millimeter Smith & Wesson M&P FPC rifle (Serial # VA75233), which has the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, and has a folding stock, a pistol grip that protrudes conspicuously beneath the action of the weapon, and a threaded barrel designed to accommodate a flash suppressor, muzzle brake, or muzzle compensator.

**COUNT 607**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, on or about June 6, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Smith & Wesson M&P FPC rifle (Serial # VA75233).

**COUNT 608**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess an assault weapon, to wit: a 9-millimeter White Label Armory pistol (Serial # WPL00163), which has the following assault weapon characteristics: a semi-automatic pistol with the capacity to accept an ammunition magazine that attaches to the pistol outside of the pistol

grip, a threaded barrel capable of accepting a barrel extender, flash suppressor, forward handgrip or silencer, and a shroud that is attached to, or partially or completely encircles, the barrel and that permits the shooter to hold the firearms with the non-trigger hand without being burned.

**COUNT 609**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, on or about June 6, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter White Label Armory pistol (Serial # WPL00163).

**COUNT 610**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112829, Invoice Item 2, Lab Item 3.1), with a capacity of more than ten rounds of ammunition.

**COUNT 611**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112829, Invoice Item 2, Lab Item 3.2), with a capacity of more than ten rounds of ammunition.

**COUNT 612**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112829, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

**COUNT 613**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of

**CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112840, Invoice Item 2), with a capacity of more than ten rounds of ammunition.

**COUNT 614**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a .40-caliber magazine (NYPD Invoice No. 4001112840, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

**COUNT 615**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112840, Invoice Item 4), with a capacity of more than ten rounds of ammunition.

**COUNT 616**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 5.56x45mm caliber magazine (NYPD Invoice No. 4001112840, Invoice Item 5), with a capacity of more than ten rounds of ammunition.

**COUNT 617**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine

(NYPD Invoice No. 4001112813, Invoice Item 1 [1 of 4]), with a capacity of more than ten rounds of ammunition.

**COUNT 618**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112813, Invoice Item 1 [2 of 4]), with a capacity of more than ten rounds of ammunition.

**COUNT 619**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112813, Invoice Item 1 [3 of 4]), with a capacity of more than ten rounds of ammunition.

**COUNT 620**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112813, Invoice Item 1 [4 of 4]), with a capacity of more than ten rounds of ammunition.

**COUNT 621**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112813, Invoice Item 2), with a capacity of more than ten rounds of ammunition.

**COUNT 622**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112813, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

**COUNT 623**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a .22-caliber magazine (NYPD Invoice No. 4001112813, Invoice Item 13), with a capacity of more than ten rounds of ammunition.



**COUNT 624**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a .556-caliber magazine (NYPD Invoice No. 4001112813, Invoice Item 14), with a capacity of more than ten rounds of ammunition.

**COUNT 625**

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine

(NYPD Invoice No. 4001112813, Invoice Item 15), with a capacity of more than ten rounds of ammunition.

Dated: July 9, 2024  
Queens County, New York

LETITIA JAMES  
Attorney General  
State of New York

By: \_\_\_\_\_  
ANN K. LEE  
Assistant Deputy Attorney General  
Organized Crime Task Force