

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

THE PEOPLE OF THE STATE OF NEW YORK

-against-

CHESTER ANDERSON,
JARRETTE CODD,
RONALD MACCARTY,

Defendants.

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendants CHESTER ANDERSON, JARRETTE CODD, and RONALD MACCARTY of the crime of CONSPIRACY IN THE FIFTH DEGREE, P.L. §105.05, committed as follows:

The defendants, in the County of New York and elsewhere, from on or about March 29, 2016 to on or about April 3, 2019, with intent that conduct constituting the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIFTH DEGREE be performed, said crime being a felony, agreed with each other to engage in and cause the performance of such conduct.

THE CONSPIRACY

During the period of this conspiracy, the defendants obtained controlled substances, including alprazolam, which they packaged and sold to other persons, known and unknown to the Grand Jury, in New York County and elsewhere.

It was part of said conspiracy for defendant CHESTER ANDERSON to operate and maintain sites on the internet that CHESTER ANDERSON used to advertise and conduct the sale of controlled substances using the name “sinmed.” Through these internet sites, defendant CHESTER ANDERSON offered for sale controlled

substances, including alprazolam. It was part of said conspiracy for defendant CHESTER ANDERSON to utilize the “sinmed” internet sites to communicate online with prospective buyers of controlled substances, to conduct sales of controlled substances, and to accept payment for such sales using bitcoin, a digital cryptocurrency.

It was further part of said conspiracy for defendants CHESTER ANDERSON, JARRETTE CODD, and RONALD MACCARTY to obtain and possess materials and equipment used to manufacture and sell tablets containing controlled substances, including inert powders, powder mixers, dies, and tablet presses, in Middlesex County, New Jersey and Cumberland County, New Jersey.

It was further part of said conspiracy for defendants CHESTER ANDERSON and JARRETTE CODD to possess a controlled substance, to wit, alprazolam, in Middlesex County, New Jersey and Cumberland County, New Jersey.

It was further part of said conspiracy for defendant CHESTER ANDERSON to send controlled substances using the United States Postal Service to his customers. It was further part of said conspiracy for defendant CHESTER ANDERSON to use the names and addresses of various businesses located in New York County and elsewhere to represent falsely that the packages containing controlled substances had been mailed from said businesses.

OVERT ACTS

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

1. On or about March 29, 2016, RONALD MACCARTY ordered 10 kilograms of microcrystalline cellulose to be delivered to the home address of CHESTER ANDERSON in Middlesex County, New Jersey.

2. On or about July 15, 2016, CHESTER ANDERSON and RONALD MACCARTY incorporated a company called “Next Level Research and Development” in the State of New Jersey.
3. On or about August 26, 2016, RONALD MACCARTY ordered 10 kilograms of microcrystalline cellulose to be delivered to his home address in Ocean County, New Jersey.
4. On or about September 29, 2016, RONALD MACCARTY ordered 10 kilograms of microcrystalline cellulose to be delivered to his home address in Ocean County, New Jersey.
5. On or about October 13, 2016, CHESTER ANDERSON emailed RONALD MACCARTY a copy of incorporation documents for Next Level Research and Development, Inc.
6. On or about November 17, 2016, RONALD MACCARTY ordered 25 kilograms of microcrystalline cellulose to be delivered to his home address in Ocean County, New Jersey.
7. On or about December 27, 2016, CHESTER ANDERSON emailed a chemical company representative, in part and in substance to inquire about purchasing one kilogram of alprazolam for \$6,500.
8. On or about December 29, 2016, RONALD MACCARTY ordered five kilograms of microcrystalline cellulose to be delivered to the home address of CHESTER ANDERSON in Middlesex County, New Jersey.
9. On or about January 13, 2017, RONALD MACCARTY ordered 50 kilograms of microcrystalline cellulose to be delivered to his home address in Ocean County, New Jersey.

10. On or about February 6, 2017, CHESTER ANDERSON emailed a chemical company representative, in part and in substance to inquire about purchasing 100 kilograms of microcrystalline cellulose.
11. On or about February 8, 2017, CHESTER ANDERSON emailed a chemical company representative, in part and in substance to inquire about purchasing 50 to 100 kilograms of microcrystalline cellulose.
12. On or about February 10, 2017, CHESTER ANDERSON emailed a chemical company representative and requested, in part and in substance, that an invoice for 100 kilograms of microcrystalline cellulose to be emailed to RONALD MACCARTY.
13. On or about February 11, 2017, CHESTER ANDERSON and RONALD MACCARTY received an invoice for 100 kilograms of microcrystalline cellulose from a chemical company representative.
14. On or about February 13, 2017, CHESTER ANDERSON emailed a chemical company representative a credit application with a list of references, one of which included JARRETTE CODD's home address.
15. On or about March 8, 2017, CHESTER ANDERSON received an email from "ProtonMail" indicating, in part and in substance that he had reserved an email account in the name "sinmac@protonmail.com."
16. On or about March 10, 2017, CHESTER ANDERSON emailed RONALD MACCARTY, in part and in substance about the purchase of a vial filling and capping machine from a person whose name is known to the Grand Jury.

17. On or about March 24, 2017, CHESTER ANDERSON emailed a person whose name is known to the Grand Jury, stating in part and in substance that his order for a vial filling and capping machine should be sent under the name “MTM Marketing from New Jersey USA.”
18. On or about March 27, 2017, CHESTER ANDERSON received an email that addressed him as “Jason Arnold” and referenced his company name as “NXT LVL.”
19. On or about April 24, 2017, CHESTER ANDERSON incorporated a company called “Next Level Research & Development” in the State of New York.
20. On or about April 25, 2017, CHESTER ANDERSON emailed a representative of a chemical company, in part and in substance to order 100 kilograms of microcrystalline cellulose.
21. On or about May 18, 2017, CHESTER ANDERSON emailed a person whose name is known to the Grand Jury, in part and in substance regarding payment for a vial filling and capping machine and indicated that his partner RONALD MACCARTY would pay the balance of the order.
22. On or about May 18, 2017, RONALD MACCARTY emailed a person whose name is known to the Grand Jury, in part and in substance about paying the balance of “equipment for next level rnd.”
23. On or about May 25, 2017, RONALD MACCARTY emailed a person whose name is known to the Grand Jury a form filled out with the Tax ID of MTM Cellular Marketing LLC and the address of a business called “Wireless Spot” in Asbury Park, New Jersey.

24. On or about August 1, 2017, CHESTER ANDERSON emailed a representative of a freight company, in part and in substance to indicate that JARRETTE CODD could be contacted to pick up an order of microcrystalline cellulose in New Jersey.
25. On or about January 25, 2018, RONALD MACCARTY emailed an equipment company representative, in part and in substance about purchasing “two sets of xanax dies.”
26. On or about February 2, 2018, RONALD MACCARTY received an email from an equipment company representative, in part and in substance confirming payment was received from MTM Cellular Marketing LLC for Xanax punch dies and a ZP9 tablet press machine.
27. On or about March 20, 2018, RONALD MACCARTY received an email from a representative of an equipment company, in part and in substance confirming additional payment was received for a ZP9 tablet press machine and a VH20 powder mixer.
28. On or about April 17, 2018, RONALD MACCARTY emailed an equipment company representative and indicated in part and in substance that the shipping address for the ZP9 tablet press machine and a VH20 powder mixer should be “Ronald MacCarty, MTM Marketing” and provided an address in Asbury Park, New Jersey.
29. On or about May 29, 2018, CHESTER ANDERSON emailed a chemical company representative, in part and in substance to order 500 kilograms of microcrystalline cellulose.

30. On or about May 30, 2018, CHESTER ANDERSON received an email from a chemical company representative with a purchase order for 500 kilograms of microcrystalline cellulose.
31. On or about June 13, 2018, CHESTER ANDERSON labeled one Priority Mail Express envelope with a return address that falsely indicated its sender was a business in New York County.
32. On or about June 26, 2018, CHESTER ANDERSON labeled one Priority Mail Express envelope with a return address that falsely indicated its sender was a business in New York County.
33. On or about July 11, 2018, CHESTER ANDERSON labeled a Priority Mail Express envelope with a return address that falsely indicated the sender was a business in New York County.
34. On or about July 11, 2018, CHESTER ANDERSON placed one Priority Mail Express envelope addressed to a person whose name is known to the Grand Jury into the mail at the Kingston Post Office in Somerset County, New Jersey.
35. On or about July 11, 2018, CHESTER ANDERSON placed four Priority Mail Express envelopes into the mail at the Kingston Post Office in Somerset County, New Jersey.
36. On or about July 20, 2018, CHESTER ANDERSON received an email addressed to "Jason Arnold."
37. On or about August 24, 2018, CHESTER ANDERSON received a delivery of 500 kilograms of microcrystalline cellulose at his home address in Middlesex County, New Jersey.

38. On or about August 27, 2018, CHESTER ANDERSON labeled two Priority Mail Express envelopes with a return address that falsely indicated their sender was a business in New York County.
39. On or about August 27, 2018, JARRETTE CODD transported barrels containing microcrystalline cellulose away from CHESTER ANDERSON'S home address in Middlesex County, New Jersey.
40. On or about October 16, 2018, JARRETTE CODD transported barrels containing microcrystalline cellulose away from CHESTER ANDERSON'S home address in Middlesex County, New Jersey.
41. On or about December 12, 2018, CHESTER ANDERSON labeled four Priority Mail Express envelopes with a return address that falsely indicated their sender was a business in New York County.
42. On or about December 12, 2018, CHESTER ANDERSON placed four Priority Mail Express envelopes into the mail at the Kingston Post Office in Somerset County, New Jersey.
43. On or about December 18, 2018, CHESTER ANDERSON labeled five Priority Mail Express envelopes with a return address that falsely indicated their sender was a business in New York County.
44. On or about December 18, 2018, CHESTER ANDERSON placed two Priority Mail Express envelopes addressed to a person whose name is known to the Grand Jury into the mail at the Plainsboro Post Office in Middlesex County, New Jersey.
45. On or about December 18, 2018, CHESTER ANDERSON placed three Priority Mail Express envelopes into the mail at the Plainsboro Post Office in Middlesex County, New Jersey.

46. On or about December 20, 2018, CHESTER ANDERSON labeled seven Priority Mail Express envelopes with a return address that falsely indicated their sender was a business in New York County.
47. On or about December 20, 2018, CHESTER ANDERSON placed seven Priority Mail Express envelopes into the mail at the Plainsboro Post Office in Middlesex County, New Jersey.
48. On or about December 27, 2018, CHESTER ANDERSON labeled five Priority Mail Express envelopes with a return address that falsely indicated their sender was a business in New York County.
49. On or about December 27, 2018, CHESTER ANDERSON placed five Priority Mail Express envelopes into the mail at the Plainsboro Post Office in Middlesex County, New Jersey.
50. On or about January 9, 2019, CHESTER ANDERSON labeled four Priority Mail Express envelopes with a return address that falsely indicated their sender was a business in New York County.
51. On or about January 9, 2019, CHESTER ANDERSON placed two Priority Mail Express envelopes addressed to a person whose name is known to the Grand Jury into the mail at the Plainsboro Post Office in Middlesex County, New Jersey.
52. On or about January 9, 2019, CHESTER ANDERSON placed two Priority Mail Express envelopes into the mail at the Plainsboro Post Office in Middlesex County, New Jersey.
53. On or about January 9, 2019, CHESTER ANDERSON placed two Priority Mail Express envelopes addressed to a person whose name is known to the Grand Jury into the mail at the Kingston Post Office in Somerset County, New Jersey.

54. On or about January 15, 2019, CHESTER ANDERSON labeled six Priority Mail Express envelopes with a return address that falsely indicated their sender was a business in the New York County.
55. On or about January 15, 2019, CHESTER ANDERSON placed six Priority Mail Express envelopes into the mail at the Plainsboro Post Office in Middlesex County, New Jersey.
56. On or about January 30, 2019, CHESTER ANDERSON labeled one Priority Mail Express envelope with a return address that falsely indicated its sender was a business in the New York County.
57. On or about January 30, 2019, CHESTER ANDERSON placed one Priority Mail Express envelope into the mail at the Plainsboro Post Office in Middlesex County, New Jersey.
58. On or about February 4, 2019, CHESTER ANDERSON labeled three Priority Mail Express envelopes with a return address that falsely indicated their sender was a business in the New York County.
59. On or about February 4, 2019, CHESTER ANDERSON placed three Priority Mail Express envelopes into the mail at the Kingston Post Office in Somerset County, New Jersey.
60. On or about March 4, 2019, CHESTER ANDERSON labeled one Priority Mail Express envelope addressed to a person whose name is known to the Grand Jury with a return address that falsely indicated its sender was a business in the New York County.

61. On or about April 3, 2019, CHESTER ANDERSON possessed alprazolam tablets, microcrystalline cellulose, a powder mixing machine, and a tablet press machine in Middlesex County, New Jersey.
62. On or about April 3, 2019, in the County of Middlesex, New Jersey, CHESTER ANDERSON possessed a Priority Mail Express envelope addressed to a person whose name is known to the Grand Jury which contained alprazolam tablets, and which was labeled with a return address falsely indicating the sender was a business in New York County.
63. On or about April 3, 2019, CHESTER ANDERSON possessed a notebook with a tab labeled “sinmed” in Middlesex County, New Jersey.
64. On or about April 3, 2019, JARRETTE CODD possessed alprazolam tablets in Middlesex County, New Jersey.
65. On or about April 3, 2019, JARRETTE CODD possessed a notebook containing a handwritten email address for “sinmed@lelantos.org” in Middlesex County, New Jersey.
66. On or about April 3, 2019, JARRETTE CODD possessed multiple tablet press and powder mixing machines in Cumberland County, New Jersey.
67. On or about April 3, 2019, JARRETTE CODD possessed alprazolam tablets in Cumberland County, New Jersey.

SECOND COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant CHESTER ANDERSON of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of P.L. §220.34(9), committed as follows:

The defendant, in New York County, on or about June 13, 2018, knowingly and unlawfully sold one or more preparations, compounds, mixtures and substances containing gamma hydroxybutyric acid to person whose identity is known to the Grand Jury, and said preparations, compounds, mixtures, and substances were of an aggregate weight of 28 grams or more.

THIRD COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant CHESTER ANDERSON of the crime of IDENTITY THEFT IN THE FIRST DEGREE, in violation of P.L. §190.80(3), committed as follows:

The defendant, in New York County, on or about June 13, 2018, knowingly and with intent to defraud assumed the identity of a person whose identity is known to the Grand Jury by presenting himself as that other person, and by acting as that other person, and by using personal identifying information of that other person, and thereby committed a Class D felony and higher level crime, and acted as an accessory in the commission of a class D and higher level felony, to wit Criminal Sale of a Controlled Substance in the Fourth Degree.

FOURTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant CHESTER ANDERSON of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIFTH DEGREE, P.L. §220.31, committed as follows:

The defendant, in New York County, on or about June 26, 2018, knowingly and unlawfully sold a controlled substance, to wit, alprazolam, to a person whose identity is known to the Grand Jury.

FIFTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant CHESTER ANDERSON of the crime of IDENTITY THEFT IN THE FIRST DEGREE, in violation of P.L. §190.80(3), committed as follows:

The defendant, in New York County, on or about June 26, 2018, knowingly and with intent to defraud assumed the identity of a person whose identity is known to the Grand Jury by presenting himself as that other person, and by acting as that other person, and by using personal identifying information of that other person, and thereby committed a Class D felony and higher level crime, and acted as an accessory in the commission of a class D and higher level felony, to wit Criminal Sale of a Controlled Substance in the Fourth Degree.

SIXTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant CHESTER ANDERSON of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIFTH DEGREE, P.L. §220.31, committed as follows:

The defendant, in New York County, on or about July 13, 2018, knowingly and unlawfully sold a controlled substance, to wit, alprazolam, to a person whose identity is known to the Grand Jury.

SEVENTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant CHESTER ANDERSON of the crime of IDENTITY THEFT IN THE FIRST DEGREE, in violation of P.L. §190.80(3), committed as follows:

The defendant, in New York County, on or about July 13, 2018, knowingly and with intent to defraud assumed the identity of a person whose identity is known to the Grand Jury by presenting himself as that other person, and by acting as that other person, and by using personal identifying information of that other person, and thereby committed a Class D felony and higher level crime, and acted as an accessory in the commission of a class D and higher level felony, to wit Criminal Sale of a Controlled Substance in the Fifth Degree, in violation of P.L. §220.31.

EIGHTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant CHESTER ANDERSON of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIFTH DEGREE, P.L. §220.31, committed as follows:

The defendant, in New York County, on or about September 5, 2018, knowingly and unlawfully sold a controlled substance, to wit, alprazolam, to a person whose identity is known to the Grand Jury.

NINTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant CHESTER ANDERSON of the crime of IDENTITY THEFT IN THE FIRST DEGREE, in violation of P.L. §190.80(3), committed as follows:

The defendant, in New York County, on or about September 5, 2018, knowingly and with intent to defraud assumed the identity of a person whose identity is known to the Grand Jury by presenting himself as that other person, and by acting as that other person, and by using personal identifying information of that other person, and thereby committed a Class D felony and higher level crime, and acted as an accessory in the commission of a class D and higher level felony, to wit Criminal Sale of a Controlled Substance in the Fifth Degree.

TENTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant CHESTER ANDERSON of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIFTH DEGREE, P.L. §220.31, committed as follows:

The defendant, in New York County, on or about March 6, 2019, knowingly and unlawfully sold a controlled substance, to wit, alprazolam, to a person whose identity is known to the Grand Jury.

ELEVENTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants of the crime of CONSPIRACY IN THE FOURTH DEGREE, P.L. §105.10(1), committed as follows:

The defendants, in New York County and elsewhere, from on or about October 22, 2016 through on or about April 3, 2019, with intent that conduct constituting the crime of MONEY LAUNDERING IN THE FIRST DEGREE be performed, said crime being a Class “B” felony, agreed with each other and with others to engage in and cause the performance of such conduct.

THE CONSPIRACY

During the period of this conspiracy, the defendants obtained funds in the form of bitcoin, a digital cryptocurrency, from the sale of controlled substances in New York County and elsewhere, to persons known and unknown to the Grand Jury (“the criminal proceeds”). Defendants then used the criminal proceeds to carry on and in furtherance of the sale of controlled substances.

It was part of said conspiracy for defendants to conduct multiple financial transactions involving the criminal proceeds, including payments for equipment and materials used in connection with the manufacture and sale of controlled substances, as well as transfers between and among accounts used and controlled by the defendants.

It was further part of said conspiracy for defendants to open pre-paid debit card accounts and to use such accounts to conduct financial transactions, including transfers and withdrawals, using the criminal proceeds.

It was further part of said conspiracy for defendant CHESTER ANDERSON to transfer the criminal proceeds into various accounts, including the debit-card accounts used by himself, JARRETTE CODD and RONALD MACCARTY.

It was further part of said conspiracy for defendants CHESTER ANDERSON and RONALD MACCARTY to purchase materials and equipment used in the manufacture and sale of pills containing controlled substances.

It was further part of said conspiracy for defendants to conduct over \$1,000,000 in cash withdrawals from debit-card accounts funded with the criminal proceeds from automatic teller machines in New York County and elsewhere.

OVERT ACTS

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

1. On or about October 22, 2016, CHESTER ANDERSON opened a pre-paid debit card account.
2. On or about October 23, 2016, JARRETTE CODD transferred a quantity of bitcoin to a pre-paid debit card account in the name CHESTER ANDERSON.

3. On or about November 29, 2016, CHESTER ANDERSON opened a Chase Bank account in the name of Next Level Research and Development in the State of New Jersey.
4. On or about November 29, 2016, CHESTER ANDERSON used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
5. On or about November 30, 2016, RONALD MACCARTY opened a pre-paid debit card account in his name.
6. On or about December 27, 2016, RONALD MACCARTY used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
7. On or about December 28, 2016, RONALD MACCARTY used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
8. On or about January 13, 2017, RONALD MACCARTY used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
9. On or about January 24, 2017, RONALD MACCARTY used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
10. On or about January 24, 2017, JARRETTE CODD opened a pre-paid debit card account in his name.
11. On or about January 31, 2017, CHESTER ANDERSON used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.

12. On or about January 31, 2017, RONALD MACCARTY used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
13. On or about February 14, 2017, JARRETTE CODD used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
14. On or about February 15, 2017, CHESTER ANDERSON used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
15. On or about February 15, 2017, RONALD MACCARTY used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
16. On or about February 16, 2017, CHESTER ANDERSON used the Next Level Research and Development account at Chase Bank to wire \$3,374.96 to a chemical company for the purchase of 100 kilograms of microcrystalline cellulose.
17. On or about March 5, 2017, JARRETTE CODD used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
18. On or about March 5, 2017, CHESTER ANDERSON used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
19. On or about March 13, 2017, RONALD MACCARTY used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
20. On or about April 18, 2017, JARRETTE CODD used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.

21. On or about April 18, 2017, CHESTER ANDERSON used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
22. On or about April 18, 2017, RONALD MACCARTY used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
23. On or about April 19, 2017, CHESTER ANDERSON opened a pre-paid debit card account in the name PEGGY ANDERSON.
24. On or about April 26, 2017, CHESTER ANDERSON used the Next Level Research and Development account at Chase Bank to wire \$2,600.00 to a chemical company for the purchase of microcrystalline cellulose.
25. On or about May 3, 2017, CHESTER ANDERSON used the Next Level Research and Development account at Chase Bank to wire \$1,000.00 to a chemical company for the purchase of microcrystalline cellulose.
26. On or about May 5, 2017, JARRETTE CODD used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
27. On or about May 5, 2017, CHESTER ANDERSON used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
28. On or about May 5, 2017, RONALD MACCARTY used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
29. On or about June 5, 2017, JARRETTE CODD used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
30. On or about June 5, 2017, CHESTER ANDERSON used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
31. On or about June 20, 2017, RONALD MACCARTY used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.

32. On or about July 18, 2017, RONALD MACCARTY used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
33. On or about July 18, 2017, JARRETTE CODD used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
34. On or about August 22, 2017, RONALD MACCARTY used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
35. On or about August 22, 2017, JARRETTE CODD used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
36. On or about September 20, 2017, JARRETTE CODD used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
37. On or about September 21, 2017, CHESTER ANDERSON used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
38. On or about September 21, 2017, RONALD MACCARTY used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
39. On or about October 18, 2017, RONALD MACCARTY used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
40. On or about October 18, 2017, JARRETTE CODD used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
41. On or about November 3, 2017, JARRETTE CODD used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.

42. On or about November 9, 2017, CHESTER ANDERSON used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
43. On or about November 9, 2017, RONALD MACCARTY used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
44. On or about December 11, 2017, RONALD MACCARTY used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
45. On or about December 12, 2017, JARRETTE CODD used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
46. On or about December 12, 2017, CHESTER ANDERSON used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
47. On or about January 2, 2018, CHESTER ANDERSON used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
48. On or about January 2, 2018, CHESTER ANDERSON used a pre-paid debit card in the name PEGGY ANDERSON to withdraw cash from an automatic teller machine in the State of New Jersey.
49. On or about January 3, 2018, JARRETTE CODD used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
50. On or about January 16, 2018, JARRETTE CODD used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.

51. On or about February 1, 2018, RONALD MACCARTY used a PNC Bank account in the name MTM Cellular Marketing LLC to wire \$3,320 to an equipment company.
52. On or about March 15, 2018, RONALD MACCARTY used a PNC Bank account in the name MTM Cellular Marketing LLC to wire \$2,000 to an equipment company.
53. On or about March 19, 2018, RONALD MACCARTY used a PNC Bank account in the name MTM Cellular Marketing LLC to wire \$3,000 to an equipment company.
54. On or about April 15, 2018, CHESTER ANDERSON opened a pre-paid debit card account in the name CARMEN LOPEZ.
55. On or about April 16, 2018, RONALD MACCARTY used a PNC Bank account in the name MTM Cellular Marketing LLC to wire \$1,900 to an equipment company.
56. On or about April 23, 2018, CHESTER ANDERSON used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
57. On or about April 23, 2018, CHESTER ANDERSON used a pre-paid debit card in the name PEGGY ANDERSON to withdraw cash from an automatic teller machine in the State of New Jersey.
58. On or about April 27, 2018, CHESTER ANDERSON used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
59. On or about April 27, 2018, CHESTER ANDERSON used a pre-paid debit card in the name PEGGY ANDERSON to withdraw cash from an automatic teller machine in the State of New Jersey.

60. On or about May 1, 2018, RONALD MACCARTY used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
61. On or about May 7, 2018, CHESTER ANDERSON used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
62. On or about May 7, 2018, CHESTER ANDERSON deposited cash from a pre-paid debit card account into a TD Bank account in his name in the State of New Jersey.
63. On or about May 11, 2018, CHESTER ANDERSON used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
64. On or about May 11, 2018, CHESTER ANDERSON used a pre-paid debit card in the name PEGGY ANDERSON to withdraw cash from an automatic teller machine in the State of New Jersey.
65. On or about May 19, 2018, CHESTER ANDERSON used a pre-paid debit card to withdraw cash from an automatic teller machine in New York County.
66. On or about May 19, 2018, CHESTER ANDERSON used a pre-paid debit card in the name CARMEN LOPEZ to withdraw cash from an automatic teller machine in New York County.
67. On or about May 19, 2018, CHESTER ANDERSON used a pre-paid debit card in the name PEGGY ANDERSON to make a purchase in New York County.
68. On or about May 21, 2018, CHESTER ANDERSON used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
69. On or about May 21, 2018, CHESTER ANDERSON used a pre-paid debit card in the name PEGGY ANDERSON to withdraw cash from an automatic teller machine in the State of New Jersey.

70. On or about May 21, 2018, CHESTER ANDERSON used a pre-paid debit card in the name CARMEN LOPEZ to withdraw cash from an automatic teller machine in the State of New Jersey.
71. On or about June 8, 2018, CHESTER ANDERSON used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
72. On or about June 8, 2018, CHESTER ANDERSON used a pre-paid debit card in the name PEGGY ANDERSON to withdraw cash from an automatic teller machine in the State of New Jersey.
73. On or about June 8, 2018, CHESTER ANDERSON used a pre-paid debit card in the name CARMEN LOPEZ to withdraw cash from an automatic teller machine in the State of New Jersey.
74. On or about June 12, 2018, JARRETTE CODD used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
75. On or about June 30, 2018, CHESTER ANDERSON used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
76. On or about June 30, 2018, CHESTER ANDERSON used a pre-paid debit card in the name PEGGY ANDERSON to withdraw cash from an automatic teller machine in the State of New Jersey.
77. On or about June 30, 2018, CHESTER ANDERSON used a pre-paid debit card in the name CARMEN LOPEZ to withdraw cash from an automatic teller machine in the State of New Jersey.
78. On or about July 2, 2018, CHESTER ANDERSON used the Next Level Research and Development account at Chase Bank to wire \$4,000.00 to a chemical company for the purchase of microcrystalline cellulose.

79. On or about July 4, 2018, CHESTER ANDERSON used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
80. On or about July 4, 2018, CHESTER ANDERSON used a pre-paid debit card in the name PEGGY ANDERSON to withdraw cash from an automatic teller machine in the State of New Jersey.
81. On or about July 4, 2018, CHESTER ANDERSON deposited cash from pre-paid debit cards in his name and the name PEGGY ANDERSON into a Chase Bank account in the name of Next Level Research and Development in the State of New Jersey.
82. On or about July 7, 2018, CHESTER ANDERSON used a pre-paid debit card to withdraw cash from an automatic teller machine in the County of New York.
83. On or about July 7, 2018, CHESTER ANDERSON used a pre-paid debit card in the name CARMEN LOPEZ to withdraw cash from an automatic teller machine in New York County.
84. On or about July 8, 2018, CHESTER ANDERSON used a pre-paid debit card to withdraw cash from an automatic teller machine in New York County.
85. On or about July 8, 2018, CHESTER ANDERSON used a pre-paid debit card in the name CARMEN LOPEZ to withdraw cash from an automatic teller machine in New York County.
86. On or about July 10, 2018, CHESTER ANDERSON used the Next Level Research and Development account at Chase Bank to wire \$500.00 to a chemical company for the purchase of microcrystalline cellulose.
87. On or about August 4, 2018, JARRETTE CODD used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.

88. On or about November 2, 2018, JARRETTE CODD used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
89. On or about November 5, 2018, JARRETTE CODD used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
90. On or about September 7, 2018, CHESTER ANDERSON used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
91. On or about September 7, 2018, CHESTER ANDERSON used a pre-paid debit card in the name PEGGY ANDERSON to withdraw cash from an automatic teller machine in the State of New Jersey.
92. On or about September 7, 2018, CHESTER ANDERSON used a pre-paid debit card in the name CARMEN LOPEZ to withdraw cash from an automatic teller machine in the State of New Jersey.
93. On or about November 7, 2018, CHESTER ANDERSON used a pre-paid debit card to withdraw cash from an automatic teller machine in New York County.
94. On or about November 7, 2018, CHESTER ANDERSON used a pre-paid debit card in the name CARMEN LOPEZ to withdraw cash from an automatic teller machine in New York County.
95. On or about November 11, 2018, JARRETTE CODD used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
96. On or about December 30, 2018, CHESTER ANDERSON used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.
97. On or about January 3, 2019, JARRETTE CODD used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.

98. On or about February 10, 2019, CHESTER ANDERSON used a pre-paid debit card to withdraw cash from an automatic teller machine in the State of New Jersey.

TWELFTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants of the crime of MONEY LAUNDERING IN THE FIRST DEGREE, in violation of P.L. §470.20(1)(a)(i)(A), committed as follows:

The defendants, in New York County and elsewhere, from on or about October 22, 2016 through on or about April 3, 2019, knowing that property involved in one or more financial transactions represented the proceeds of the criminal sale of a controlled substance, conducted one or more transactions which in fact involved the proceeds of the criminal sale of a controlled substance, with intent to promote the carrying on of specified criminal conduct, and the total value of the property involved in such financial transaction and transactions exceeded five hundred thousand dollars.

GJ #-

Filed:

CCI

CR-010581-19NY

CR-010582-19NY

CR-010583-19NY

No.

THE PEOPLE OF THE STATE OF NEW YORK

-against-

CHESTER ANDERSON,
JARRETTE CODD,
RONALD MACCARTY,

Defendants.

INDICTMENT

CONSPIRACY IN THE FIFTH DEGREE, P.L. §105.05(1)
CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, P.L. §220.34(9) - DEF. C. Anderson
IDENTITY THEFT IN THE FIRST DEGREE, P.L. §190.80(3) - DEF. C. Anderson, 4 Cts
CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIFTH DEGREE, P.L. §220.31 - DEF. C. Anderson, 4 Cts
CONSPIRACY IN THE FOURTH DEGREE, P.L. §105.10(1)
MONEY LAUNDERING IN THE FIRST DEGREE, P.L. §470.20(1)(a)(i)(A)

CYRUS R. VANCE, JR., District Attorney

A True Bill

Daniel Haier
Cybercrime and Identity Theft Bureau

Foreman

ADJOURNED TO PART _____ ON _____