

STATE OF NEW YORK: COUNTY OF DUTCHESS  
COUNTY COURT

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THE PEOPLE OF THE STATE OF NEW YORK

-against-

**INDICTMENT**

LOUIS GONZALEZ;  
JASON KNAPP;  
MUAYAD QADER, a/k/a “JUNIOR”;  
JOSEPH SILVERMAN, a/k/a “JOEY”,

No. 70099-24

DEFENDANTS.

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**COUNTS**

Conspiracy in the Fourth Degree - PL § 105.10(1) [E Fel] – 3 Count  
(Against JASON KNAPP, Counts 1, 3, 4)  
(Against MUAYAD QADER, Counts 1, 3, 4)  
(Against JOSEPH SILVERMAN, Count 1)

Conspiracy in the Fifth Degree - PL § 105.05(1) [A Misd] – 1 Count  
(Against LOUIS GONZALEZ, Count 2)  
(Against JASON KNAPP, Count 2)  
(Against MUAYAD QADER, Count 2)  
(Against JOSEPH SILVERMAN, Count 2)

Criminal Sale of a Firearm in the First Degree - PL § 265.13(2) [B Violent Fel] – 2 Counts  
(Against JASON KNAPP, Counts 48, 129)  
(Against MUAYAD QADER, Counts 48, 129)

Criminal Sale of a Firearm in the Second Degree - PL § 265.12(2) [C Violent Fel] – 3 Counts  
(Against JASON KNAPP, Counts 49, 130)  
(Against MUAYAD QADER, Counts 10, 49, 130)  
(Against JOSEPH SILVERMAN, Count 10)

Criminal Sale of a Firearm in the Third Degree – PL § 265.11(1) [D Violent Fel] – 38 Counts  
(Against LOUIS GONZALEZ, Counts 27, 32, 34, 36, 38, 40, 42, 44, 46)  
(Against JASON KNAPP, Counts 51, 56, 60, 65, 68, 73, 81, 87, 92, 94, 97, 102, 107, 114, 119, 121, 124, 132, 137, 140, 145, 148, 153)  
(Against MUAYAD QADER, Counts 6, 12, 18, 22, 27, 32, 34, 36, 38, 40, 42, 44, 46, 51, 56, 60, 65, 68, 73, 75, 81, 87, 92, 94, 97, 102, 107, 110, 114, 119, 121, 124, 132, 137, 140, 145, 148, 153)  
(Against JOSEPH SILVERMAN, Counts 12, 22)

Criminal Sale of a Ghost Gun in the Second Degree – PL § 265.60(1) [E Fel] – 14 Counts  
(Against JASON KNAPP, Counts 55, 64, 72, 85, 91, 101, 106, 118, 136, 144, 152)  
(Against MUAYAD QADER, Counts 16, 21, 26, 55, 64, 72, 85, 91, 101, 106, 118, 136, 144, 152)  
(Against JOSEPH SILVERMAN, Counts 16, 26)

Criminal Sale of an Unfinished Frame or Receiver in the Second Degree – PL § 265.63 [E Fel] – 2 Counts  
(Against LOUIS GONZALEZ, Count 31)  
(Against JASON KNAPP, Count 58)  
(Against MUAYAD QADER, Counts 31, 58)

Criminal Possession of a Weapon in the Second Degree – PL § 265.03(3) [C Violent Fel] – 14 Counts  
(Against JASON KNAPP, Counts 50, 59, 67, 80, 86, 96, 123, 131, 139, 147)  
(Against MUAYAD QADER, Counts 5, 11, 17, 50, 59, 67, 80, 86, 96, 109, 123, 131, 139, 147)  
(Against JOSEPH SILVERMAN, Count 11)

Criminal Possession of a Weapon in the Third Degree – PL § 265.02(1) [D Fel] – 19 Counts  
(Against LOUIS GONZALEZ, Count 29)  
(Against MUAYAD QADER, Counts 8, 14, 19, 24, 29, 53, 62, 70, 78, 83, 89, 99, 104, 112, 116, 127, 134, 142, 150)

Criminal Possession of a Weapon in the Third Degree – PL § 265.02(3) [D Fel] – 3 Counts  
(Against JASON KNAPP, Count 126)  
(Against MUAYAD QADER, Counts 77, 111, 126)

Criminal Possession of a Weapon in the Third Degree – PL § 265.02(7) [D Violent Fel] – 17 Counts

(Against LOUIS GONZALEZ, Count 28)

(Against JASON KNAPP, Counts 52, 61, 69, 82, 88, 98, 103, 115, 125, 133, 133, 141, 149)

(Against MUAYAD QADER, Counts 7, 13, 23, 28, 52, 61, 69, 76, 82, 88, 98, 103, 115, 125, 133, 141, 149)

(Against JOSEPH SILVERMAN, Counts 13, 23)

Criminal Possession of a Firearm – PL § 265.01-b(1) [E Fel] – 19 Counts

(Against LOUIS GONZALEZ, Count 30)

(Against JASON KNAPP, Counts 54, 63, 71, 84, 90, 100, 105, 117, 128, 135, 143, 151)

(Against MUAYAD QADER, Counts 9, 15, 20, 25, 30, 54, 63, 71, 79, 84, 90, 100, 105, 113, 117, 128, 135, 143, 151)

(Against JOSEPH SILVERMAN, Count 25)

NICOLE KEARY

Deputy Attorney General

Organized Crime Task Force

BY: GRIFFIN C. KENYON

Assistant Deputy Attorney General

Organized Crime Task Force

**A TRUE BILL**

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GRAND JURY FOREPERSON

Dated: February 9, 2024

STATE OF NEW YORK: COUNTY OF DUTCHESS  
COUNTY COURT

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

-against-

LOUIS GONZALEZ;  
JASON KNAPP;  
MUAYAD QADER, a/k/a “JUNIOR”;  
JOSEPH SILVERMAN, a/k/a “JOEY”,

**INDICTMENT**

**No. 70099-24**

DEFENDANTS.

-----X

**COUNT 1**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP; MUAYAD QADER a/k/a “JUNIOR”** (hereinafter, “**MUAYAD QADER**”); and **JOSEPH SILVERMAN a/k/a “JOEY”** (hereinafter, “**JOSEPH SILVERMAN**”), of the crime of **CONSPIRACY IN THE FOURTH DEGREE**, in violation of Section 105.10(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and between April 24, 2022 and January 26, 2023, in Dutchess County, with intent that conduct constituting the crimes of Criminal Sale of a Firearm in the Second Degree, in violation of Section 265.12(2) of the Penal Law of the State of New York, said crime being a class C felony, and/or 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, said crime being a class C 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 C felonies.

## PREAMBLE

It was the purpose of this conspiracy to obtain, assemble, possess, control, and transport firearms in Dutchess County, and to collect the proceeds from the sale of those firearms.

It was the role of **MUAYAD QADER** to obtain firearms from **JOSEPH SILVERMAN** for resale to an individual known to the Grand Jury.

It was the role of **JOSEPH SILVERMAN** to supply firearms to **MUAYAD QADER** for resale.

It was the role of **JASON KNAPP** to assemble and supply firearms to **JOSEPH SILVERMAN** for resale to **MUAYAD QADER**.

It was also part of this conspiracy for members of the conspiracy to communicate with each other and others over cellular telephones using codes and communicating in a guarded, cryptic manner.

## 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 April 24, 2022, **MUAYAD QADER** and an individual known to the Grand Jury had a phone conversation, during which **MUAYAD QADER** stated, in sum and substance, “Yeah, you could do that brother...you can just give me sixteen hundred today and give me the rest whenever you get it.”
2. On or about April 24, 2022, **MUAYAD QADER** sent an SMS/text message to an individual known to the Grand Jury, which stated in sum and substance, “62 Janet drive Poughkeepsie Ny 12603”.

3. On or about April 24, 2022, in the vicinity of 62 Janet Drive, Apt. D, Poughkeepsie, New York 12603, in Dutchess County, **MUAYAD QADER** sold one 5.56-millimeter semi-automatic Alexandria Pro Fab Co. rifle to an individual known to the Grand Jury, in exchange for a sum of United States currency collected by **MUAYAD QADER**.
4. On or about August 27, 2022, **MUAYAD QADER** sent an SMS/text message to an individual known to the Grand Jury, which stated in sum and substance, “My bad for the late text but just gotta chance to see it no it’s completely ghosty [ghost emoji] no #rs at all”.
5. On or about August 27, 2022, **MUAYAD QADER** sent an SMS/text message to an individual known to the Grand Jury, which stated in sum and substance, “...he was talking also talking about 3500 for 1500 rounds...”.
6. On or about August 29, 2022, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, in Dutchess County, **MUAYAD QADER** and **JOSEPH SILVERMAN** sold one 7.62x39-millimeter semi-automatic AR-15 ghost gun rifle to an individual known to the Grand Jury, in exchange for a sum of United States currency collected by **MUAYAD QADER**.
7. On or about September 3, 2022, **MUAYAD QADER** and an individual known to the Grand Jury had a phone conversation, during which **MUAYAD QADER** stated, in sum and substance, “I got a guy who’s got one for sale, Glock 17 ghost and he’s got another too...”
8. On or about September 3, 2022, **MUAYAD QADER** sent an SMS/text message to an individual known to the Grand Jury, which stated in sum and substance, “He’s getting me some pictures of the ghost Glk 17 right now but this is the other and it is numbered.”

9. On or about September 4, 2022, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, in Dutchess County, **MUAYAD QADER** sold one 9-millimeter semi-automatic Polymer-80 ghost gun pistol to an individual known to the Grand Jury, in exchange for a sum of United States currency collected by **MUAYAD QADER**.
10. On or about September 6, 2022, **MUAYAD QADER** sent an SMS/text message to an individual known to the Grand Jury, which stated in sum and substance, “Yo I just got word he’ll be ready in a half an hour any way u can bump it up”.
11. On or about September 6, 2022, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, in Dutchess County, **MUAYAD QADER** and **JOSEPH SILVERMAN** sold one 7.62x39-millimeter semi-automatic AR-15 ghost gun rifle to an individual known to the Grand Jury, in exchange for a sum of United States currency collected by **MUAYAD QADER** and a sum of United States currency collected by **JOSEPH SILVERMAN**.
12. On or about January 26, 2023, **JASON KNAPP** had a conversation with an individual known to the Grand Jury and **MUAYAD QADER** during which he stated, in sum and substance, that he assembled and supplied firearms to **JOSEPH SILVERMAN** that were resold to **MUAYAD QADER**.

## **COUNT 2**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP; LOUIS GONZALEZ; MUAYAD QADER; and JOSEPH SILVERMAN**, of the crime of **CONSPIRACY IN THE FIFTH DEGREE**, in violation of Section 105.05(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and between April 24, 2022 and January 26, 2023, in Dutchess County, with intent that conduct constituting the crimes of Criminal Sale of a Firearm in the Third Degree, in violation of Section 265.11(1) of the Penal Law of the State of New York, said crime being a 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 felony.

#### **PREAMBLE**

It was the purpose of this conspiracy to obtain, assemble, possess, control, and transport firearms in Dutchess County, and to collect the proceeds from the sale of those firearms.

It was the role of **MUAYAD QADER** to obtain firearms from **JOSEPH SILVERMAN** for resale to an individual known to the Grand Jury.

It was the role of **JOSEPH SILVERMAN** to supply firearms to **MUAYAD QADER** for resale.

It was the role of **JASON KNAPP** to assemble and supply firearms to **JOSEPH SILVERMAN** for resale to **MUAYAD QADER**.

It was the role of **MUAYAD QADER** to obtain firearms from **LOUIS GONZALEZ** for resale to an individual known to the Grand Jury.

It was the role of **LOUIS GONZALEZ** to supply firearms to **MUAYAD QADER** for resale.

It was also part of this conspiracy for members of the conspiracy to communicate with each other and others over cellular telephones using codes and communicating in a guarded, cryptic manner.

## 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 April 24, 2022, **MUAYAD QADER** and an individual known to the Grand Jury had a phone conversation, during which **MUAYAD QADER** stated, in sum and substance, “Yeah, you could do that brother...you can just give me sixteen hundred today and give me the rest whenever you get it.”
2. On or about April 24, 2022, **MUAYAD QADER** sent an SMS/text message to an individual known to the Grand Jury, which stated in sum and substance, “62 Janet drive Poughkeepsie Ny 12603”.
3. On or about April 24, 2022, in the vicinity of 62 Janet Drive, Apt. D, Poughkeepsie, New York 12603, in Dutchess County, **MUAYAD QADER** sold one 5.56-millimeter semi-automatic Alexandria Pro Fab Co. rifle to an individual known to the Grand Jury, in exchange for a sum of United States currency collected by **MUAYAD QADER**.
4. On or about September 3, 2022, **MUAYAD QADER** and an individual known to the Grand Jury had a phone conversation, during which **MUAYAD QADER** stated, in sum and substance, “Yeah, yeah. It’s coming from the same guy...same guy, same guy through another guy”.
5. On or about September 6, 2022, in the parking area of 1144 State Route 55, LaGrangeville, New York 12540, in Dutchess County, **JOSEPH SILVERMAN** displayed an AR-15 style ghost gun rifle for sale to an individual known to the Grand Jury.

6. On or about November 3, 2022, **MUAYAD QADER** sent an MMS message to an individual known to the Grand Jury, which contained a picture of a firearm and an upper receiver.
7. On or about November 3, 2022, **MUAYAD QADER** sent an SMS/text message to an individual known to the Grand Jury, which stated in sum and substance, “10 magazines, 500 rounds of ammo, 2 set ups long range and close Quarters, \$3000”.
8. On or about November 3, 2022, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, in Dutchess County, **LOUIS GONZALEZ** met **MUAYAD QADER** and transferred one .223 caliber semi-automatic Remington R-15 VTR rifle from his vehicle to **MUAYAD QADER**’s Honda Pilot.
9. On or about November 3, 2022, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, in Dutchess County, **LOUIS GONZALEZ** and **MUAYAD QADER** sold one .223 caliber semi-automatic Remington R-15 VTR rifle to an individual known to the Grand Jury, in exchange for a sum of United States currency collected by **MUAYAD QADER**.
10. On or about January 26, 2023, **JASON KNAPP** had a conversation with an individual known to the Grand Jury and **MUAYAD QADER** during which he stated, in sum and substance, that he assembled and supplied firearms to **JOSEPH SILVERMAN** that were resold to **MUAYAD QADER**.

### **COUNT 3**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CONSPIRACY IN THE**

**FOURTH DEGREE**, in violation of Section 105.10(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and between February 28, 2023, and April 23, 2023, in Dutchess County, with intent that conduct constituting the crimes of Criminal Sale of a Firearm in the First Degree, in violation of Section 265.13(2) of the Penal Law of the State of New York, 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, and transport firearms in Dutchess County, and to collect the proceeds from the sale of those firearms.

It was the role of **MUAYAD QADER** to obtain firearms from **JASON KNAPP** for resale to an individual known to the Grand Jury.

It was the role of **JASON KNAPP** to supply firearms to **MUAYAD QADER** for resale.

It was also part of this conspiracy for members of the conspiracy to communicate with each other and others over cellular telephones using codes and communicating in a guarded, cryptic manner.

#### **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 February 28, 2023, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, in Dutchess County, **JASON KNAPP** met **MUAYAD QADER** and

transferred one .223 Wylde caliber semi-automatic AR-15 ghost gun rifle from his vehicle to **MUAYAD QADER**'s Honda Pilot.

2. On March 1, 2023, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, in Dutchess County, **JASON KNAPP** and **MUAYAD QADER** sold one .223 Wylde caliber semi-automatic AR-15 ghost gun rifle to an individual known to the Grand Jury, in exchange for a sum of United States currency collected by **MUAYAD QADER**.
3. On March 2, 2023, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, in Dutchess County, **JASON KNAPP** met **MUAYAD QADER** and transferred one AR-15 ghost gun lower receiver from his vehicle to **MUAYAD QADER**'s Honda Pilot.
4. On March 2, 2023, **MUAYAD QADER** sent an SMS/text message to an individual known to the Grand Jury, which stated in sum and substance, "We're in Business it's brand new and [ghost emoji] so what does that bump us up too?"
5. On March 3, 2023, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, in Dutchess County, **JASON KNAPP** and **MUAYAD QADER** sold one AR-15 ghost gun lower receiver to an individual known to the Grand Jury, in exchange for a sum of United States currency collected by **MUAYAD QADER**.
6. On March 26, 2023, **MUAYAD QADER** sent a series of SMS/text messages to an individual known to the Grand Jury. The first SMS/text message stated, in sum and substance, "Yo I can get this 223 swapped to a [ghost emoji] today for 1300 our cost". The second SMS/text message stated, in sum and substance, "16" stainless barrel, 5.56, Also shoots 223".

7. On March 26, 2023, in the vicinity of 62 Janet Drive, Apt. D, Poughkeepsie, New York 12603, in Dutchess County, **JASON KNAPP** met **MUAYAD QADER** and gave him one .223 Wylde caliber semi-automatic AR-15 ghost gun rifle, contained in a white bag, to which **MUAYAD QADER** took the white bag containing the firearm into his residence.
8. On March 26, 2023, in the parking lot of 62 Janet Drive, Apt. D, Poughkeepsie, New York 12603, in Dutchess County, **JASON KNAPP** and **MUAYAD QADER** sold one .223 Wylde caliber semi-automatic AR-15 ghost gun rifle, contained in a white bag, to an individual known to the Grand Jury, in exchange for a sum of United States currency collected by **MUAYAD QADER**.
9. On March 28, 2023, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, in Dutchess County, **JASON KNAPP** concealed one .458 SOCOM caliber semi-automatic AR-15 ghost gun rifle under his shirt and entered the location to provide the firearm to **MUAYAD QADER**.
10. On March 28, 2023, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, in Dutchess County, **JASON KNAPP** and **MUAYAD QADER** sold one .458 SOCOM caliber semi-automatic AR-15 ghost gun rifle to an individual known to the Grand Jury, in exchange for a sum of United States currency collected by **MUAYAD QADER**.
11. On April 8, 2023, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, in Dutchess County, **JASON KNAPP** met **MUAYAD QADER** and transferred one AR style ghost gun rifle to **MUAYAD QADER**'s Honda Pilot.

12. On April 8, 2023, **MUAYAD QADER** sent an SMS/text message which stated, in sum and substance, “I’ll have one of them in 10 mins and the other at 3:00 3:30”.
13. On April 8, 2023, in the vicinity of 62 Janet Drive, Apt. D, Poughkeepsie, New York 12603, in Dutchess County, **JASON KNAPP** met **MUAYAD QADER** and transferred one AR style ghost gun rifle to **MUAYAD QADER**’s Honda Pilot.
14. On April 8, 2023, in the vicinity of 62 Janet Drive, Apt. D, Poughkeepsie, New York 12603, in Dutchess County, **JASON KNAPP** and **MUAYAD QADER** sold one 5.56-millimeter NATO semi-automatic AR-15 ghost gun rifle and one .223 Wylde caliber semi-automatic AR-15 ghost gun rifle to an individual known to the Grand Jury, in exchange for a sum of United States currency collected by **MUAYAD QADER**.
15. On April 10, 2023, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, **JASON KNAPP** and **MUAYAD QADER** sold one .223 Wylde caliber semi-automatic AR-15 ghost gun rifle and one 7.62x39-millimeter NATO semi-automatic AR-15 ghost gun rifle to an individual known to the Grand Jury, for a sum of United States currency collected by **MUAYAD QADER**.
16. On April 16, 2023, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, **JASON KNAPP** concealed one .45 caliber semi-automatic Glock 21 pistol in a bag and entered the location to provide the firearm to **MUAYAD QADER**.
17. On April 16, 2023, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, **MUAYAD QADER** sold one .45 caliber semi-automatic Glock 21 pistol to an individual known to the Grand Jury, with a sum of United States currency collected by **MUAYAD QADER**.

18. On April 18, 2023, **MUAYAD QADER** sent an SMS/text message to an individual known to the Grand Jury, which stated, in sum and substance, “Yo could we do anything with another aR today ?”
19. On April 18, 2023, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, **JASON KNAPP** met **MUAYAD QADER** and transferred one 5.56-millimeter NATO semi-automatic AR-15 ghost gun rifle to **MUAYAD QADER**’s Honda Pilot.
20. On April 20, 2023, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, **JASON KNAPP** and **MUAYAD QADER** sold one 5.56-millimeter NATO semi-automatic AR-15 ghost gun rifle to an individual known to the Grand Jury, in exchange for a sum of United States currency collected by **MUAYAD QADER**.
21. On April 21, 2023, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, **JASON KNAPP** carried a cardboard box into the location.
22. On April 23, 2023, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, **JASON KNAPP** and **MUAYAD QADER** sold one .308 WIN caliber semi-automatic Aero Precision rifle to an individual known to the Grand Jury, in exchange for a sum of United States currency collected by **MUAYAD QADER**.

#### **COUNT 4**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CONSPIRACY IN THE FOURTH DEGREE**, in violation of Section 105.10(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and between September 13, 2023, and September 21, 2023, in Dutchess County, with intent that conduct constituting the crimes of Criminal Sale of a Firearm

in the First Degree, in violation of Section 265.13(2) of the Penal Law of the State of New York , 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, and transport firearms in Dutchess County, and to collect the proceeds from the sale of those firearms.

It was the role of **MUAYAD QADER** to obtain firearms from **JASON KNAPP** for resale to an individual known to the Grand Jury.

It was the role of **JASON KNAPP** to supply firearms to **MUAYAD QADER** for resale.

It was also part of this conspiracy for members of the conspiracy to communicate with each other and others over cellular telephones using codes and communicating in a guarded, cryptic manner.

### **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 September 12, 2023, **MUAYAD QADER** sent an SMS/text message to an individual known to the Grand Jury, which stated, in sum and substance, “Yo can we do anything with another AR”.
2. On or about September 13, 2023, in the vicinity of 62 Janet Drive, Apt. D, Poughkeepsie, New York 12603, in Dutchess County, **JASON KNAPP** met **MUAYAD QADER** and transferred one .223 Wylde caliber semi-automatic AR-15 ghost gun rifle from his vehicle into **MUAYAD QADER**’s Honda Pilot.

3. On or about September 13, 2023, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, **JASON KNAPP** and **MUAYAD QADER** sold one .223 Wylde caliber semi-automatic AR-15 ghost gun rifle to an individual known to the Grand Jury, in exchange for a sum of United States currency collected by **MUAYAD QADER**.
4. On or about September 19, 2023, **MUAYAD QADER** sent an SMS/text message to an individual known to the Grand Jury, which stated, in sum and substance, “Yo you gonna be ready for another one of those things this afternoon?”
5. On or about September 19, 2023, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, in Dutchess County, **JASON KNAPP** met **MUAYAD QADER** and transferred one .458 SOCOM caliber semi-automatic AR-15 ghost gun rifle from his vehicle into **MUAYAD QADER**’s Honda Pilot.
6. On or about September 19, 2023, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, **JASON KNAPP** and **MUAYAD QADER** sold one .458 SOCOM caliber semi-automatic AR-15 ghost gun rifle to an individual known to the Grand Jury, in exchange for a sum of United States currency collected by **MUAYAD QADER**.
7. On or about September 20, 2023, **MUAYAD QADER** sent an SMS/text message which stated, in sum and substance, “You gonna be ready for another [ghost emoji] at 4:30 5 Oclock”.
8. On or about September 20, 2023, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, in Dutchess County, **JASON KNAPP** met **MUAYAD QADER** and transferred one 5.56-millimeter NATO semi-automatic AR-15 ghost gun rifle from his vehicle into **MUAYAD QADER**’s Honda Pilot.

9. On or about September 21, 2023, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, **JASON KNAPP** and **MUAYAD QADER** sold one 5.56-millimeter NATO semi-automatic AR-15 ghost gun rifle to an individual known to the Grand Jury, in exchange for a sum of United States currency collected by **MUAYAD QADER**.

**COUNT 5**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, **MUAYAD QADER**, 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, 2022, in Dutchess County, did possess a loaded firearm, to wit: a loaded 5.56-millimeter semi-automatic Alexandria Pro Fab Co. rifle, 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 6**

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

Said defendant, on or about April 24, 2022, in Dutchess 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: one 5.56-millimeter semi-automatic Alexandria Pro Fab Co. rifle.

**COUNT 7**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, **MUAYAD QADER**, 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 24, 2022, in Dutchess County, did possess an assault weapon, to wit: one 5.56-millimeter semi-automatic Alexandria Pro Fab Co. rifle, which had the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, a telescoping stock, a pistol grip that protrudes conspicuously beneath the action of the weapon, and a flash suppressor.

**COUNT 8**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2022, in Dutchess County, did possess a firearm, to wit: one 5.56-millimeter semi-automatic Alexandria Pro Fab Co. rifle.

**COUNT 9**

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

Said defendant, on or about April 24, 2022, in Dutchess County, did possess a firearm, to wit: one 5.56-millimeter semi-automatic Alexandria Pro Fab Co. rifle.

**COUNT 10**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **MUAYAD QADER** and **JOSEPH SILVERMAN**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE**, in violation of Section 265.12(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 and between August 29, 2022 and September 6, 2022, in Dutchess 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 7.62x39-millimeter semi-automatic AR-15 ghost gun rifle and one 5.45x39-millimeter semi-automatic AR-15 ghost gun rifle.

**COUNT 11**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, **MUAYAD QADER** and **JOSEPH SILVERMAN**, 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, on or about August 29, 2022, in Dutchess County, did possess a loaded firearm, to wit: a loaded 7.62x39-millimeter semi-automatic AR-15 ghost gun rifle, 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 12**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **MUAYAD QADER** and **JOSEPH SILVERMAN**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(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 August 29, 2022, in Dutchess 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: one 7.62x39-millimeter semi-automatic AR-15 ghost gun rifle.

**COUNT 13**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **MUAYAD QADER** and **JOSEPH SILVERMAN**, 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 August 29, 2022, in Dutchess County, did possess an assault weapon, to wit: one 7.62x39-millimeter semi-automatic AR-15 ghost gun rifle, which had the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, a telescoping stock, a pistol grip that protrudes conspicuously beneath the action of the weapon, and a flash suppressor.

**COUNT 14**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about August 29, 2022, in Dutchess County, did possess a firearm, to wit: one 7.62x39-millimeter semi-automatic AR-15 ghost gun rifle.

**COUNT 15**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **MUAYAD QADER** and **JOSEPH SILVERMAN**, of the crime of **CRIMINAL POSSESSION OF A FIREARM**, in violation of Section 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 August 29, 2022, in Dutchess County, did possess a firearm, to wit: one 7.62x39-millimeter semi-automatic AR-15 ghost gun rifle.

**COUNT 16**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **MUAYAD QADER** and **JOSEPH SILVERMAN**, of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE**, in violation of Section 265.60(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 August 29, 2022, in Dutchess 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: one 7.62x39-millimeter semi-automatic AR-15 ghost gun rifle.

**COUNT 17**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, **MUAYAD QADER**, 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 September 4, 2022, in Dutchess County, did possess a loaded firearm, to wit: a loaded 9-millimeter semi-automatic Polymer-80 ghost gun pistol, 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 18**

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

Said defendant, on or about September 4, 2022, in Dutchess 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: one 9-millimeter semi-automatic Polymer-80 ghost gun pistol.

**COUNT 19**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about September 4, 2022, in Dutchess County, did possess a firearm, to wit: one 9-millimeter semi-automatic Polymer-80 ghost gun pistol.

**COUNT 20**

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

Said defendant, on or about September 4, 2022, in Dutchess County, did possess a firearm, to wit: one 9-millimeter semi-automatic Polymer-80 ghost gun pistol.

**COUNT 21**

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

Said defendant, on or about September 4, 2022, in Dutchess 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: one 9-millimeter semi-automatic Polymer-80 ghost gun pistol.

**COUNT 22**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **MUAYAD QADER** and **JOSEPH SILVERMAN**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(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 September 6, 2022, in Dutchess 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: one 5.45x39-millimeter semi-automatic AR-15 ghost gun rifle.

**COUNT 23**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **MUAYAD QADER** and **JOSEPH SILVERMAN**, 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 September 6, 2022, in Dutchess County, did possess an assault weapon, to wit: one 5.45x39-millimeter semi-automatic AR-15 ghost gun rifle, which had the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, a telescoping stock, a pistol grip that protrudes conspicuously beneath the action of the weapon, and a flash suppressor.

**COUNT 24**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON**

**IN THE THIRD DEGREE**, in violation of Section 265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about September 6, 2022, in Dutchess County, did possess a firearm, to wit: one 5.45x39-millimeter semi-automatic AR-15 ghost gun rifle.

**COUNT 25**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **MUAYAD QADER** and **JOSEPH SILVERMAN**, of the crime of **CRIMINAL POSSESSION OF A FIREARM**, in violation of Section 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 September 4, 2022, in Dutchess County, did possess a firearm, to wit: one 5.45x39-millimeter semi-automatic AR-15 ghost gun rifle.

**COUNT 26**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **MUAYAD QADER** and **JOSEPH SILVERMAN**, of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE**, in violation of Section 265.60(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 September 6, 2022, in Dutchess 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: one 5.45x39-millimeter semi-automatic AR-15 ghost gun rifle.

**COUNT 27**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **LOUIS GONZALEZ** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(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 November 3, 2022, in Dutchess 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: one .223 caliber semi-automatic Remington R-15 VTR rifle.

**COUNT 28**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **LOUIS GONZALEZ** and **MUAYAD QADER**, 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 November 3, 2022, in Dutchess County, did possess an assault weapon, to wit: one .223 caliber semi-automatic Remington R-15 VTR rifle, which had the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, a telescoping stock, a pistol grip that protrudes conspicuously beneath the action of the weapon, and a flash suppressor.

**COUNT 29**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **LOUIS GONZALEZ** and **MUAYAD QADER**, of the crime of **CRIMINAL**

**POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 265.02(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 November 3, 2022, in Dutchess County, did possess a firearm, to wit: one .223 caliber semi-automatic Remington R-15 VTR rifle.

**COUNT 30**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **LOUIS GONZALEZ** and **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A FIREARM**, in violation of Section 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 November 3, 2022, in Dutchess County, did possess a firearm, to wit: one .223 caliber semi-automatic Remington R-15 VTR rifle.

**COUNT 31**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **LOUIS GONZALEZ** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF AN UNFINISHED FRAME OR RECEIVER IN THE SECOND DEGREE**, in violation of Section 265.63 of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about November 3, 2022, in Dutchess County, did unlawfully sell, exchange, give, or dispose of an unfinished frame or receiver, to wit: one AR -15 ghost gun upper receiver, knowing that it was an unfinished frame or receiver.

**COUNT 32**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **LOUIS GONZALEZ** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(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 November 3, 2022, in Dutchess 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 magazine with a capacity of more than ten rounds of ammunition.

**COUNT 33**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **LOUIS GONZALEZ** and **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 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 November 3, 2022, in Dutchess County, did possess a large capacity ammunition feeding device, to wit: a magazine with a capacity of more than ten rounds of ammunition.

**COUNT 34**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **LOUIS GONZALEZ** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(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 November 3, 2022, in Dutchess 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 magazine with a capacity of more than ten rounds of ammunition.

**COUNT 35**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **LOUIS GONZALEZ** and **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 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 November 3, 2022, in Dutchess County, did possess a large capacity ammunition feeding device, to wit: a magazine with a capacity of more than ten rounds of ammunition.

**COUNT 36**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **LOUIS GONZALEZ** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(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 November 3, 2022, in Dutchess 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 magazine with a capacity of more than ten rounds of ammunition.

**COUNT 37**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **LOUIS GONZALEZ** and **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 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 November 3, 2022, in Dutchess County, did possess a large capacity ammunition feeding device, to wit: a magazine with a capacity of more than ten rounds of ammunition.

**COUNT 38**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **LOUIS GONZALEZ** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(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 November 3, 2022, in Dutchess 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 magazine with a capacity of more than ten rounds of ammunition.

**COUNT 39**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **LOUIS GONZALEZ** and **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 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 November 3, 2022, in Dutchess County, did possess a large capacity ammunition feeding device, to wit: a magazine with a capacity of more than ten rounds of ammunition.

**COUNT 40**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **LOUIS GONZALEZ** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(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 November 3, 2022, in Dutchess 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 magazine with a capacity of more than ten rounds of ammunition.

**COUNT 41**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **LOUIS GONZALEZ** and **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 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 November 3, 2022, in Dutchess County, did possess a large capacity ammunition feeding device, to wit: a magazine with a capacity of more than ten rounds of ammunition.

**COUNT 42**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **LOUIS GONZALEZ** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE**

**OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(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 November 3, 2022, in Dutchess 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 magazine with a capacity of more than ten rounds of ammunition.

**COUNT 43**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **LOUIS GONZALEZ** and **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 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 November 3, 2022, in Dutchess County, did possess a large capacity ammunition feeding device, to wit: a magazine with a capacity of more than ten rounds of ammunition.

**COUNT 44**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **LOUIS GONZALEZ** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(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 November 3, 2022, in Dutchess 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 magazine with a capacity of more than ten rounds of ammunition.

**COUNT 45**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **LOUIS GONZALEZ** and **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 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 November 3, 2022, in Dutchess County, did possess a large capacity ammunition feeding device, to wit: a magazine with a capacity of more than ten rounds of ammunition.

**COUNT 46**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **LOUIS GONZALEZ** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(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 November 3, 2022, in Dutchess 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 magazine with a capacity of more than ten rounds of ammunition.

**COUNT 47**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **LOUIS GONZALEZ** and **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 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 November 3, 2022, in Dutchess County, did possess a large capacity ammunition feeding device, to wit: a magazine with a capacity of more than ten rounds of ammunition.

**COUNT 48**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE**, in violation of Section 265.13(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 and between March 1, 2023 and April 23, 2023, in Dutchess 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 .223 Wylde caliber semi-automatic AR-15 ghost gun rifles, one .458 SOCOM caliber semi-automatic AR-15 ghost gun rifle, two 5.56-millimeter NATO semi-automatic AR-15 ghost gun rifles, one .45 caliber semi-automatic Glock 21 pistol, and one .308 WIN caliber semi-automatic Aero Precision rifle.

**COUNT 49**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE**, in violation of Section 265.12(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 and between March 1, 2023 and April 23, 2023, in Dutchess 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 .223 Wylde caliber semi-automatic AR-15 ghost gun rifles, one .458 SOCOM caliber semi-automatic AR-15 ghost gun rifle, two 5.56-millimeter NATO semi-automatic AR-15 ghost gun rifles, one .45 caliber semi-automatic Glock 21 pistol, and one .308 WIN caliber semi-automatic Aero Precision rifle.

#### **COUNT 50**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, 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, on or about and between February 28, 2023 and March 1, 2023, in Dutchess County, did possess a loaded firearm, to wit: a loaded .223 Wylde caliber semi-automatic AR-15 ghost gun rifle, 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 51**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(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 and between February 28, 2023 and March 1, 2023, in Dutchess 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: one .223 Wylde caliber semi-automatic AR-15 ghost gun rifle.

**COUNT 52**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, 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 and between February 28, 2023 and March 1, 2023, in Dutchess County, did possess an assault weapon, to wit: one .223 Wylde caliber semi-automatic AR-15 ghost gun rifle, which had the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, a telescoping stock, a pistol grip that protrudes conspicuously beneath the action of the weapon, and a flash suppressor.

**COUNT 53**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between February 28, 2023 and March 1, 2023, in Dutchess County, did possess a firearm, to wit: one .223 Wylde caliber semi-automatic AR-15 ghost gun rifle.

**COUNT 54**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A FIREARM**, in violation of Section 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 and between February 28, 2023 and March 1, 2023, in Dutchess County, did possess a firearm, to wit: one .223 Wylde caliber semi-automatic AR-15 ghost gun rifle.

**COUNT 55**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE**, in violation of Section 265.60(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 and between February 28, 2023 and March 1, 2023, in Dutchess 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: one .223 Wylde caliber semi-automatic AR-15 ghost gun rifle.

**COUNT 56**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(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 and between February 28, 2023 and March 1, 2023, in Dutchess 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 magazine with a capacity of more than ten rounds of ammunition.

**COUNT 57**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 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 and between February 28, 2023 and March 1, 2023, in Dutchess County, did possess a large capacity ammunition feeding device, to wit: a magazine with a capacity of more than ten rounds of ammunition.

**COUNT 58**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF AN UNFINISHED FRAME OR RECEIVER IN THE SECOND DEGREE**, in violation of Section 265.63 of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 3, 2023, in Dutchess County, did unlawfully sell, exchange, give, or dispose of an unfinished frame or receiver, to wit: one AR-15 ghost gun lower receiver, knowing that it was an unfinished frame or receiver.

**COUNT 59**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, 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, on or about March 26, 2023, in Dutchess County, did possess a loaded firearm, to wit: a loaded .223 Wylde caliber semi-automatic AR-15 ghost gun rifle, 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 60**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(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 March 26, 2023, in Dutchess 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: one .223 Wylde caliber semi-automatic AR-15 ghost gun rifle.

**COUNT 61**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, 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 March 26, 2023, in Dutchess County, did possess an assault weapon, to wit: one .223 Wylde caliber semi-automatic AR-15 ghost gun rifle, which had the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, a telescoping stock, a pistol grip that protrudes conspicuously beneath the action of the weapon, and a flash suppressor.

**COUNT 62**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 26, 2023, in Dutchess County, did possess a firearm, to wit: one .223 Wylde caliber semi-automatic AR-15 ghost gun rifle.

**COUNT 63**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A FIREARM**, in violation of Section 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 March 26, 2023, in Dutchess County, did possess a firearm, to wit: one .223 Wylde caliber semi-automatic AR-15 ghost gun rifle.

**COUNT 64**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE**, in violation of Section 265.60(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 March 26, 2023, in Dutchess 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: one .223 Wylde caliber semi-automatic AR-15 ghost gun rifle.

**COUNT 65**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(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 March 26, 2023, in Dutchess 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 magazine with a capacity of more than ten rounds of ammunition.

**COUNT 66**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 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 March 26, 2023, in Dutchess County, did possess a large capacity ammunition feeding device, to wit: a magazine with a capacity of more than ten rounds of ammunition.

**COUNT 67**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, 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, on or about March 28, 2023, in Dutchess County, did possess a loaded firearm, to wit: a loaded .458 SOCOM caliber semi-automatic AR-15 ghost gun rifle, 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 68**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(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 March 28, 2023, in Dutchess 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: one .458 SOCOM caliber semi-automatic AR-15 ghost gun rifle.

**COUNT 69**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, 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 March 28, 2023, in Dutchess County, did possess an assault weapon, to wit: one .458 SOCOM caliber semi-automatic AR-15 ghost gun rifle, which had the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, a telescoping stock, a pistol grip that protrudes conspicuously beneath the action of the weapon, and a flash suppressor.

**COUNT 70**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 28, 2023, in Dutchess County, did possess a firearm, to wit: one .458 SOCOM caliber semi-automatic AR-15 ghost gun rifle.

**COUNT 71**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A FIREARM**, in violation of Section 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 March 28, 2023, in Dutchess County, did possess a firearm, to wit: one .458 SOCOM caliber semi-automatic AR-15 ghost gun rifle.

**COUNT 72**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE**, in violation of Section 265.60(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 March 28, 2023, in Dutchess 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: one .458 SOCOM caliber semi-automatic AR-15 ghost gun rifle.

**COUNT 73**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(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 March 28, 2023, in Dutchess 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 millimeter magazine with a capacity of more than ten rounds of ammunition.

**COUNT 74**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 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 March 28, 2023, in Dutchess County, did possess a large capacity ammunition feeding device, to wit: a magazine with a capacity of more than ten rounds of ammunition.

**COUNT 75**

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

Said defendant, on or about March 30, 2023, in Dutchess 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: one 12-gauge caliber semi-automatic Kalashnikov Komrad RS12 shotgun.

**COUNT 76**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant **MUAYAD QADER**, 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 30, 2023, in Dutchess County, did possess an assault weapon, to wit: one 12-gauge caliber semi-automatic Kalashnikov Komrad RS12 shotgun, which

had the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, a pistol grip that protrudes conspicuously beneath the action of the weapon, and a second handgrip or a protruding grip that can be held by the non-trigger hand.

**COUNT 77**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 265.02(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 30, 2023, in Dutchess County, did possess firearm, to wit: one 12-gauge caliber semi-automatic Kalashnikov Komrad RS12 shotgun, which had been defaced for the purpose of concealment or prevention of the detection of a crime or misrepresenting the identify of such.

**COUNT 78**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 30, 2023, in Dutchess County, did possess a firearm, to wit: one 12-gauge caliber semi-automatic Kalashnikov Komrad RS12 shotgun.

**COUNT 79**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A FIREARM**,

in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 30, 2023, in Dutchess County, did possess a firearm, to wit: one 12-gauge caliber semi-automatic Kalashnikov Komrad RS12 shotgun.

**COUNT 80**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, 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, on or about April 8, 2023, in Dutchess County, did possess a loaded firearm, to wit: a loaded 5.56-millimeter NATO semi-automatic AR-15 ghost gun rifle, 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 81**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(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 April 8, 2023, in Dutchess 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: one 5.56-millimeter NATO semi-automatic AR-15 ghost gun rifle.

**COUNT 82**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, 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 April 8, 2023, in Dutchess County, did possess an assault weapon, to wit: one 5.56-millimeter NATO semi-automatic AR-15 ghost gun rifle, which had the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, a telescoping stock, a pistol grip that protrudes conspicuously beneath the action of the weapon, and a flash suppressor.

**COUNT 83**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 8, 2023, in Dutchess County, did possess a firearm, to wit: one 5.56-millimeter NATO semi-automatic AR-15 ghost gun rifle.

**COUNT 84**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL**

**POSSESSION OF A FIREARM**, in violation of Section 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 April 8, 2023, in Dutchess County, did possess a firearm, to wit: one 5.56-millimeter NATO semi-automatic AR-15 ghost gun rifle.

**COUNT 85**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE**, in violation of Section 265.60(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 April 8, 2023, in Dutchess 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: one 5.56-millimeter NATO semi-automatic AR-15 ghost gun rifle.

**COUNT 86**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, 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, on or about April 8, 2023, in Dutchess County, did possess a loaded firearm, to wit: a loaded .223 Wylde caliber semi-automatic AR-15 ghost gun rifle, 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 87**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(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 April 8, 2023, in Dutchess 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: one .223 Wylde caliber semi-automatic AR-15 ghost gun rifle.

**COUNT 88**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, 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 April 8, 2023, in Dutchess County, did possess an assault weapon, to wit: one .223 Wylde caliber semi-automatic AR-15 ghost gun rifle, which had the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, a telescoping stock, a pistol grip that protrudes conspicuously beneath the action of the weapon, and a flash suppressor.

**COUNT 89**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 8, 2023, in Dutchess County, did possess a firearm, to wit: one .223 Wylde caliber semi-automatic AR-15 ghost gun rifle.

**COUNT 90**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A FIREARM**, in violation of Section 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 April 8, 2023, in Dutchess County, did possess a firearm, to wit: one .223 Wylde caliber semi-automatic AR-15 ghost gun rifle.

**COUNT 91**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE**, in violation of Section 265.60(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 April 8, 2023, in Dutchess 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: one .223 Wylde caliber semi-automatic AR-15 ghost gun rifle.

**COUNT 92**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(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 April 8, 2023, in Dutchess 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 magazine with a capacity of more than ten rounds of ammunition.

**COUNT 93**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 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 April 8, 2023, in Dutchess County, did possess a large capacity ammunition feeding device, to wit: a magazine with a capacity of more than ten rounds of ammunition.

**COUNT 94**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF**

**A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(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 April 8, 2023, in Dutchess 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 magazine with a capacity of more than ten rounds of ammunition.

**COUNT 95**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 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 April 8, 2023, in Dutchess County, did possess a large capacity ammunition feeding device, to wit: a magazine with a capacity of more than ten rounds of ammunition.

**COUNT 96**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, 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, on or about and between April 9, 2023, and April 10, 2023, in Dutchess County, did possess a loaded firearm, to wit: a loaded .223 Wylde caliber semi-automatic AR-15 ghost gun rifle, 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 97**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(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 and between April 9, 2023, and April 10, 2023, in Dutchess 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: one .223 Wylde caliber semi-automatic AR-15 ghost gun rifle.

**COUNT 98**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, 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 and between April 9, 2023, and April 10, 2023, in Dutchess County, did possess an assault weapon, to wit: one .223 Wylde caliber semi-automatic AR-15 ghost gun rifle, which had the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, a telescoping stock, a pistol grip that protrudes conspicuously beneath the action of the weapon, and a flash suppressor.

**COUNT 99**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between April 9, 2023, and April 10, 2023, in Dutchess County, did possess a firearm, to wit: one .223 Wylde caliber semi-automatic AR-15 ghost gun rifle.

**COUNT 100**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A FIREARM**, in violation of Section 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 and between April 9, 2023, and April 10, 2023, in Dutchess County, did possess a firearm, to wit: one .223 Wylde caliber semi-automatic AR-15 ghost gun rifle.

**COUNT 101**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE**, in violation of Section 265.60(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 and between April 9, 2023, and April 10, 2023, in Dutchess 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: one .223 Wylde caliber semi-automatic AR-15 ghost gun rifle.

**COUNT 102**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(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 and between April 9, 2023, and April 10, 2023, in Dutchess 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: one 7.62x39-millimeter NATO semi-automatic AR-15 ghost gun rifle.

**COUNT 103**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, 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 and between April 9, 2023, and April 10, 2023, in Dutchess County, did possess an assault weapon, to wit: one 7.62x39-millimeter NATO semi-automatic AR-15 ghost gun rifle, which had the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, a telescoping stock, a pistol grip that protrudes conspicuously beneath the action of the weapon, and a flash suppressor.

**COUNT 104**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between April 9, 2023, and April 10, 2023, in Dutchess County, did possess a firearm, to wit: 7.62x39-millimeter NATO semi-automatic AR-15 ghost gun rifle.

**COUNT 105**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A FIREARM**, in violation of Section 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 and between April 9, 2023, and April 10, 2023, in Dutchess County, did possess a firearm, to wit: 7.62x39-millimeter NATO semi-automatic AR-15 ghost gun rifle.

**COUNT 106**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE**, in violation of Section 265.60(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 and between April 9, 2023, and April 10, 2023, in Dutchess 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 7.62x39-millimeter NATO semi-automatic AR-15 ghost gun rifle.

**COUNT 107**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(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 and between April 9, 2023, and April 10, 2023, in Dutchess 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 magazine with a capacity of more than ten rounds of ammunition.

**COUNT 108**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 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 and between April 9, 2023, and April 10, 2023, in Dutchess County, did possess a large capacity ammunition feeding device, to wit: a magazine with a capacity of more than ten rounds of ammunition.

**COUNT 109**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant **MUAYAD QADER**, 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 16, 2023, in Dutchess County, did possess a loaded firearm, to wit: a loaded .45 caliber semi-automatic Glock 21 pistol, 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 110**

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

Said defendant on or about April 16, 2023, in Dutchess 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: one .45 caliber semi-automatic Glock 21 pistol.

**COUNT 111**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 265.02(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 16, 2023, in Dutchess County, did possess firearm, to wit: one .45 caliber semi-automatic Glock 21 pistol, which had been defaced for the purpose of

concealment or prevention of the detection of a crime or misrepresenting the identity of such firearm.

**COUNT 112**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 16, 2023, in Dutchess County, did possess a firearm, to wit: one .45 caliber semi-automatic Glock 21 pistol.

**COUNT 113**

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

Said defendant, on or about April 16, 2023, in Dutchess County, did possess a firearm, to wit: one .45 caliber semi-automatic Glock 21 pistol.

**COUNT 114**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(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 April 20, 2023, in Dutchess 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: one 5.56-millimeter NATO semi-automatic AR-15 ghost gun rifle.

**COUNT 115**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, 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 April 20, 2023, in Dutchess County, did possess an assault weapon, to wit: one 5.56-millimeter NATO semi-automatic AR-15 ghost gun rifle, which had the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, a telescoping stock, a pistol grip that protrudes conspicuously beneath the action of the weapon, and a flash suppressor.

**COUNT 116**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 20, 2023, in Dutchess County, did possess a firearm, to wit: one 5.56-millimeter NATO semi-automatic AR-15 ghost gun rifle.

**COUNT 117**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL**

**POSSESSION OF A FIREARM**, in violation of Section 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 April 20, 2023, in Dutchess County, did possess a firearm, to wit: one 5.56-millimeter NATO semi-automatic AR-15 ghost gun rifle.

**COUNT 118**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE**, in violation of Section 265.60(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 April 20, 2023, in Dutchess 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: one 5.56-millimeter NATO semi-automatic AR-15 ghost gun rifle.

**COUNT 119**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(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 April 20, 2023, in Dutchess 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 magazine with a capacity of more than ten rounds of ammunition.

**COUNT 120**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 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 April 20, 2023, in Dutchess County, did possess a large capacity ammunition feeding device, to wit: a magazine with a capacity of more than ten rounds of ammunition.

**COUNT 121**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(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 April 20, 2023, in Dutchess 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 magazine with a capacity of more than ten rounds of ammunition.

**COUNT 122**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 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 April 20, 2023, in Dutchess County, did possess a large capacity ammunition feeding device, to wit: a magazine with a capacity of more than ten rounds of ammunition.

**COUNT 123**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, 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, on or about and between April 21, 2023 and April 23, 2023, in Dutchess County, did possess a loaded firearm, to wit: a loaded .308 WIN caliber semi-automatic Aero Precision rifle, 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 124**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(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 and between April 21, 2023 and April 23, 2023, in Dutchess 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: one .308 WIN caliber semi-automatic Aero Precision rifle.

**COUNT 125**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, 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 and between April 21, 2023 and April 23, 2023, in Dutchess County, did possess an assault weapon, to wit: one .308 WIN caliber semi-automatic Aero Precision rifle, which had the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, a telescoping stock, a pistol grip that protrudes conspicuously beneath the action of the weapon, and a flash suppressor.

**COUNT 126**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 265.02(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 and between April 21, 2023 and April 23, 2023, in Dutchess County, did possess firearm, to wit: one .308 WIN caliber semi-automatic Aero Precision rifle, which had been defaced for the purpose of concealment or prevention of the detection of a crime or misrepresenting the identity of such firearm.

**COUNT 127**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON**

**IN THE THIRD DEGREE**, in violation of Section 265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between April 21, 2023 and April 23, 2023, in Dutchess County, did possess a firearm, to wit: one .308 WIN caliber semi-automatic Aero Precision rifle.

**COUNT 128**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A FIREARM**, in violation of Section 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 and between April 21, 2023 and April 23, 2023, in Dutchess County, did possess a firearm, to wit: one .308-millimeter WIN caliber semi-automatic Aero Precision rifle.

**COUNT 129**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE**, in violation of Section 265.13(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 and between September 13, 2023 and September 21, 2023, in Dutchess 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 .223 Wylde caliber semi-automatic AR-15 ghost gun rifle, one .458 SOCOM caliber semi-automatic AR-15 ghost gun rifle, and one 5.56-millimeter NATO semi-automatic AR-15 ghost gun rifle.

### **COUNT 130**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE**, in violation of Section 265.12(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 and between September 13, 2023 and September 21, 2023, in Dutchess 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 .223 Wylde caliber semi-automatic AR-15 ghost gun rifle, one .458 SOCOM caliber semi-automatic AR-15 ghost gun rifle, and one 5.56-millimeter NATO semi-automatic AR-15 ghost gun rifle.

### **COUNT 131**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, 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, on or about September 13, 2023, in Dutchess County, did possess a loaded firearm, to wit: a loaded .223 Wylde caliber semi-automatic AR-15 ghost gun rifle, and such possession took place outside the defendant's 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 132**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(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 September 13, 2023, in Dutchess 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: one .223 Wylde caliber semi-automatic AR-15 ghost gun rifle.

**COUNT 133**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, 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 September 13, 2023, in Dutchess County, did possess an assault weapon, to wit: one .223 Wylde caliber semi-automatic AR-15 ghost gun rifle, which had the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, a telescoping stock, a pistol grip that protrudes conspicuously beneath the action of the weapon, and a flash suppressor.

**COUNT 134**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON**

**IN THE THIRD DEGREE**, in violation of Section 265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about September 13, 2023, in Dutchess County, did possess a firearm, to wit: one .223 Wylde caliber semi-automatic AR-15 ghost gun rifle.

**COUNT 135**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A FIREARM**, in violation of Section 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 September 13, 2023, in Dutchess County, did possess a firearm, to wit: one .223 Wylde caliber semi-automatic AR-15 ghost gun rifle.

**COUNT 136**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE**, in violation of Section 265.60(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 September 13, 2023, in Dutchess 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: one .223 Wylde caliber semi-automatic AR-15 ghost gun rifle.

**COUNT 137**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(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 September 13, 2023, in Dutchess 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 magazine with a capacity of more than ten rounds of ammunition.

**COUNT 138**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 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 September 13, 2023, in Dutchess County, did possess a large capacity ammunition feeding device, to wit: a magazine with a capacity of more than ten rounds of ammunition.

**COUNT 139**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, 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, on or about September 19, 2023, in Dutchess County, did possess a loaded firearm, to wit: a loaded .458 SOCOM caliber semi-automatic AR-15 ghost gun rifle, 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 140**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(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 September 19, 2023, in Dutchess 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: one .458 SOCOM caliber semi-automatic AR-15 ghost gun rifle.

**COUNT 141**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, 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 September 19, 2023, in Dutchess County, did possess an assault weapon, to wit: one .458 SOCOM caliber semi-automatic AR-15 ghost gun rifle, which had the following assault weapon characteristics: a semi-automatic

rifle that has an ability to accept a detachable magazine, a telescoping stock, a pistol grip that protrudes conspicuously beneath the action of the weapon, and a flash suppressor.

**COUNT 142**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about September 19, 2023, in Dutchess County, did possess a firearm, to wit: one .458 SOCOM caliber semi-automatic AR-15 ghost gun rifle.

**COUNT 143**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A FIREARM**, in violation of Section 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 September 19, 2023, in Dutchess County, did possess a firearm, to wit: one .458 SOCOM caliber semi-automatic AR-15 ghost gun rifle.

**COUNT 144**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE**, in violation of Section 265.60(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 September 19, 2023, in Dutchess 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: one .458 SOCOM caliber semi-automatic AR-15 ghost gun rifle.

**COUNT 145**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(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 September 19, 2023, in Dutchess 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 magazine with a capacity of more than ten rounds of ammunition.

**COUNT 146**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 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 September 19, 2023, in Dutchess County, did possess a large capacity ammunition feeding device, to wit: a magazine with a capacity of more than ten rounds of ammunition.

**COUNT 147**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, 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, on or about and between September 20, 2023 and September 21, 2023, in Dutchess County, did possess a loaded firearm, to wit: a loaded 5.56-millimeter NATO semi-automatic AR-15 ghost gun rifle, 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 148**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(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 and between September 20, 2023 and September 21, 2023, in Dutchess 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: one 5.56-millimeter NATO semi-automatic AR-15 ghost gun rifle.

**COUNT 149**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, 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 and between September 20, 2023 and September 21, 2023, in Dutchess County, did possess an assault weapon, to wit: one 5.56-millimeter NATO semi-automatic AR-15 ghost gun rifle, which had the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, a telescoping stock, a pistol grip that protrudes conspicuously beneath the action of the weapon, and a flash suppressor.

**COUNT 150**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between September 20, 2023 and September 21, 2023, in Dutchess County, did possess a firearm, to wit: one 5.56-millimeter NATO semi-automatic AR-15 ghost gun rifle.

**COUNT 151**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A FIREARM**, in violation of Section 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 and between September 20, 2023 and September 21, 2023, in Dutchess County, did possess a firearm, to wit: one 5.56-millimeter NATO semi-automatic AR-15 ghost gun rifle.

**COUNT 152**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE**, in violation of Section 265.60(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 and between September 20, 2023 and September 21, 2023, in Dutchess 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: one 5.56-millimeter NATO semi-automatic AR-15 ghost gun rifle.

**COUNT 153**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(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 and between September 20, 2023 and September 21, 2023, in Dutchess 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 magazine with a capacity of more than ten rounds of ammunition.

**COUNT 154**

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **JASON KNAPP** and **MUAYAD QADER**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 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 and between September 20, 2023 and September 21, 2023, in Dutchess County, did possess a large capacity ammunition feeding device, to wit: a magazine with a capacity of more than ten rounds of ammunition.

Dated: February 9, 2024  
Dutchess County, New York

NICOLE KEARY  
Deputy Attorney General  
Organized Crime Task Force

By: \_\_\_\_\_  
GRIFFIN C. KENYON  
Assistant Deputy Attorney General  
Organized Crime Task Force

**A TRUE BILL**

\_\_\_\_\_  
GRAND JURY FOREPERSON  
Dated: February 9, 2024

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**JOSEPH SILVERMAN**

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**LOUIS GONZALEZ**

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STATE OF NEW YORK: COUNTY OF DUTCHESS  
COUNTY COURT

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THE PEOPLE OF THE STATE OF NEW YORK

- against -

LOUIS GONZALEZ;  
JASON KNAPP;  
MUAYAD QADER, a/k/a “JUNIOR”;  
JOSEPH SILVERMAN, a/k/a “JOEY”,

DEFENDANTS.

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**INDICTMENT NO. 70099-24**

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Attorney General

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