

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF RICHMOND: CRIMINAL TERM

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

INDICTMENT

Indictment No.: 70363-24/001 (EM)

Filed:  
File No.: 23-0381

002 (GP)  
005 (MM)

-against-

ETTORE MAZZEI, a/k/a "MAZ,"  
GARY PULICE,

[REDACTED]  
MELISSA MAZZEI,

*Office Origin Sealed  
as to All Counts*

*Defendants.*

-----X  
COUNT ONE

THE GRAND JURY OF THE COUNTY OF RICHMOND, by this Indictment, accuses the defendants, ETTORE MAZZEI, a/k/a "MAZ" (hereinafter "MAZ"), GARY PULICE (hereinafter "GARY"), [REDACTED] and MELISSA MAZZEI (hereinafter "MELISSA"), of the crime of:

CONSPIRACY IN THE SECOND DEGREE (P.L. §105.15), committed as follows:

The said defendants, in the Borough of Staten Island, County of Richmond, City and State of New York, and elsewhere, from on or about March 19, 2023, to on or about April 4, 2024, with intent that conduct constituting the crimes of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE** and **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, said crimes being class A felonies, be performed, 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 A felonies.

## PREAMBLE

It was part of the conspiracy for **MAZ**, [REDACTED], **GARY**, [REDACTED], and **MELISSA** to receive, package, and distribute quantities of cocaine on Staten Island, New York, and elsewhere, and to collect the proceeds of those narcotics transactions.

It was also part of the conspiracy for [REDACTED] and [REDACTED] to supply **MAZ**, **GARY**, and **MELISSA** with cocaine to sell to their customers in Staten Island.

It was also part of the conspiracy for **MAZ**, [REDACTED], **GARY**, [REDACTED], and **MELISSA** to frequently communicate with each other and with customers, to plan, negotiate, and arrange for the sale and delivery of cocaine.

It was also part of the conspiracy for **MAZ**, [REDACTED], **GARY**, [REDACTED], and **MELISSA** to store thousands of dollars of narcotics proceeds generated from cocaine distribution.

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

## OVERT ACTS

In furtherance of said conspiracy, and to achieve the objects thereof, from on or about March 19, 2023, to on or about April 4, 2024, the following overt acts, among others, were committed:

1. On or about March 19, 2023, in a coded and cryptic telephone conversation, **GARY** agreed to sell a quantity of cocaine to a police officer known to the Grand Jury, on March 20, 2023, in the vicinity of 691 Bay Street, on Staten Island.
2. On or about March 20, 2023, **GARY** told a police officer known to the Grand Jury that **GARY** needed to obtain the cocaine from his supplier, **MAZ**.
3. On or about March 20, 2023, **GARY** instructed a police officer known to the Grand Jury to drive to the vicinity of 691 Bay Street, on Staten Island.
4. On or about March 20, 2023, **GARY** received a sum of United States currency from a police officer known to the Grand Jury.
5. On or about March 20, 2023, **GARY** went inside 703 Bay Street, on Staten Island, to obtain cocaine from his supplier, **MAZ**.
6. On or about March 20, 2023, **MAZ** gave **GARY** a quantity of cocaine inside of 703 Bay Street, on Staten Island.
7. On or about March 20, 2023, **GARY** gave a police officer known to the Grand Jury a quantity of cocaine in the vicinity of 691 Bay Street, on Staten Island.

8. On or about October 4, 2023, in a coded and cryptic telephone conversation, **GARY** agreed to sell a quantity of cocaine to a police officer known to the Grand Jury, on October 5, 2023, in the vicinity of 691 Bay Street, on Staten Island.

9. On or about October 5, 2023, **GARY** instructed a police officer known to the Grand Jury to pick up **GARY** in the vicinity of Bay Street and Hannah Street, on Staten Island.

10. On or about October 5, 2023, **GARY** instructed a police officer known to the Grand Jury to drive to the vicinity of 691 Bay Street, on Staten Island.

11. On or about October 5, 2023, **GARY** met with **MAZ** inside of 691 Bay Street, on Staten Island.

12. On or about October 5, 2023, **GARY** informed a police officer known to the Grand Jury that **MAZ** requested a sum of United States currency in exchange for a quantity of cocaine.

13. On or about October 5, 2023, **GARY** received a sum of United States currency from a police officer known to the Grand Jury.

14. On or about October 5, 2023, **GARY** met with **MAZ** in front of 691 Bay Street, on Staten Island, and walked inside of 703 Bay Street, on Staten Island.

15. On or about October 5, 2023, **MAZ** gave **GARY** a quantity of cocaine inside of 703 Bay Street, on Staten Island.

16. On or about October 5, 2023, **GARY** gave a police officer known to the Grand Jury a quantity of cocaine in the vicinity of 691 Bay Street, on Staten Island.

17. On or about October 25, 2023, in a coded and cryptic telephone conversation, **GARY** agreed to sell over a ½ ounce of cocaine to a police officer known to the Grand Jury, on October 26, 2023, in the vicinity of 691 Bay Street, on Staten Island.

18. On or about October 26, 2023, **GARY** instructed a police officer known to the Grand Jury to pick up **GARY** in the vicinity of 101 Myrtle Avenue, on Staten Island.

19. On or about October 26, 2023, **GARY** instructed a police officer known to the Grand Jury to drive to the vicinity of 691 Bay Street, on Staten Island.

20. On or about October 26, 2023, **GARY** met **MAZ** inside of 703 Bay Street, on Staten Island.

21. On or about October 26, 2023, **GARY** informed a police officer known to the Grand Jury that **MAZ** requested a sum of United States currency in exchange for over a ½ ounce of cocaine.

22. On or about October 26, 2023, **GARY** received a sum of United States currency from a police officer known to the Grand Jury.

23. On or about October 26, 2023, **GARY** re-entered 703 Bay Street, on Staten Island, and met with **MAZ**.

24. On or about October 26, 2023, **MAZ** gave **GARY** over a ½ ounce of cocaine inside of 703 Bay Street, on Staten Island.

25. On or about October 26, 2023, **GARY** gave a police officer known to the Grand Jury over a ½ ounce of cocaine in front of 700 Bay Street, on Staten Island.

26. On or about November 7, 2023, in a coded and cryptic telephone conversation, **GARY** agreed to sell over a ½ ounce of cocaine to a police officer known to the Grand Jury, on November 8, 2023, in the vicinity of 691 Bay Street, on Staten Island.

27. On or about November 8, 2023, **GARY** communicated with **MAZ** through text message.

28. On or about November 8, 2023, **MAZ** communicated with **GARY** through text message.

29. On or about November 8, 2023, **GARY** instructed a police officer known to the Grand Jury to pick up **GARY** in the vicinity of 270 Bay Street, on Staten Island.

30. On or about November 8, 2023, **GARY** instructed a police officer known to the Grand Jury to drive to the vicinity of 691 Bay Street, on Staten Island.

31. On or about November 8, 2023, **GARY** called **MAZ**.

32. On or about November 8, 2023, **GARY** received a sum of United States currency from a police officer known to the Grand Jury.

33. On or about November 8, 2023, **GARY** met with **MAZ** inside of 703 Bay Street, on Staten Island.

34. On or about November 8, 2023, **GARY** and **MAZ** entered 691 Bay Street, on Staten Island.

35. On or about November 8, 2023, **MAZ** gave **GARY** over a ½ ounce of cocaine inside of 691 Bay Street, on Staten Island.

36. On or about November 8, 2023, **GARY** gave a police officer known to the Grand Jury over a ½ ounce of cocaine in front of 696 Bay Street, on Staten Island.

37. On or about November 15, 2023, **MAZ** called [REDACTED].

38. On or about November 15, 2023, [REDACTED] drove to the vicinity of 703 Bay Street, on Staten Island.

39. On or about November 15, 2023, **MAZ** met with [REDACTED] inside of 703 Bay Street, on Staten Island.

40. On or about November 15, 2023, in a coded and cryptic telephone conversation, **GARY** agreed to sell over a ½ ounce of cocaine to a police officer known to the Grand Jury, on November 16, 2023, in the vicinity of 691 Bay Street, on Staten Island.

41. On or about November 15, 2023, **GARY** communicated with **MAZ**, through text message.

42. On or about November 15, 2023, **MAZ** communicated with **GARY** through text message.

43. On or about November 16, 2023, **MAZ** communicated with **GARY** through text message.

44. On or about November 16, 2023, **GARY** instructed a police officer known to the Grand Jury to drive to the vicinity of 691 Bay Street, on Staten Island.

45. On or about November 16, 2023, **GARY** met with a police officer known to the Grand Jury in front of 696 Bay Street, on Staten Island.

46. On or about November 16, 2023, **GARY** agreed to sell a police officer known to the Grand Jury over a ½ ounce of cocaine in front of 696 Bay Street.

47. On or about November 16, 2023, **GARY** met with **MAZ** inside of 701 Bay Street, on Staten Island.

48. On or about November 16, 2023, **MAZ** wrote a note on a slip of paper detailing the quantity and price of the cocaine.

49. On or about November 16, 2023, **GARY** met with a police officer known to the Grand Jury in front of 696 Bay Street, on Staten Island, and handed a police officer known to the Grand Jury a slip of paper detailing the price and quantity of the cocaine.

50. On or about November 16, 2023, **GARY** received a sum of United States currency from a police officer known to the Grand Jury.

51. On or about November 16, 2023, **GARY** met with **MAZ** inside of 701 Bay Street, on Staten Island.

52. On or about November 16, 2023, **MAZ** gave **GARY** over a ½ ounce of cocaine, inside of 701 Bay Street, on Staten Island.

53. On or about November 16, 2023, **GARY** gave a police officer known to the Grand Jury over a ½ ounce of cocaine in front of 696 Bay Street, on Staten Island.

54. On or about November 21, 2023, in a coded and cryptic telephone conversation, **MAZ** and **GARY** discussed a future narcotics transaction involving a police officer known to the Grand Jury.

55. On or about November 28, 2023, in a coded and cryptic telephone conversation, **GARY** agreed to sell over 2 ounces of cocaine to a police officer known to the Grand Jury, on November 30, 2023, in the vicinity of 691 Bay Street, on Staten Island.

56. On or about November 28, 2023, **GARY** told a police officer known to the Grand Jury that **MAZ** would have over 2 ounces of cocaine ready on November 30, 2023.

57. On or about November 28, 2023, **GARY** communicated with **MAZ** through text message.

58. On or about November 28, 2023, **MAZ** communicated with **GARY** through text message.

59. On or about November 28, 2023, in a coded and cryptic telephone conversation, **MAZ** agreed to supply **GARY** with over 2 ounces of cocaine to sell to a police officer known to the Grand Jury.

60. On or about November 30, 2023, in a coded and cryptic telephone conversation, **MAZ** ordered over a ½ ounce of cocaine from [REDACTED].

61. On or about November 30, 2023, [REDACTED] called **MAZ** and agreed to meet **MAZ** at 2:00 P.M.

62. On or about November 30, 2023, [REDACTED] drove to the vicinity of 703 Bay Street, on Staten Island.

63. On or about November 30, 2023, [REDACTED] gave **MAZ** over a ½ ounce of cocaine inside of 703 Bay Street, on Staten Island.

64. On or about November 30, 2023, **GARY** communicated with **MAZ** through text message.

65. On or about November 30, 2023, **MAZ** communicated with **GARY** through text message.

66. On or about November 30, 2023, **GARY** instructed a police officer known to the Grand Jury to pick up **GARY** in the vicinity of 101 Myrtle Avenue, on Staten Island.

67. On or about November 30, 2023, **GARY** instructed a police officer known to the Grand Jury to drive to the vicinity of 691 Bay Street, on Staten Island.

68. On or about November 30, 2023, **GARY** met **MAZ** inside of 691 Bay Street, on Staten Island.

69. On or about November 30, 2023, **MAZ** wrote a note on a slip of paper detailing the quantity and price of the cocaine.

70. On or about November 30, 2023, in the vicinity of Bay Street and Broad Street, on Staten Island, **GARY** handed a police officer known to the Grand Jury a slip of paper detailing the price and quantity of the cocaine.

71. On or about November 30, 2023, **GARY** received a sum of United States currency from a police officer known to the Grand Jury.

72. On or about November 30, 2023, **GARY** met with **MAZ** inside of 691 Bay Street, on Staten Island.

73. On or about November 30, 2023, **MAZ** gave **GARY** over 2 ounces of cocaine inside of 691 Bay Street, on Staten Island.

74. On or about November 30, 2023, **GARY** gave a police officer known to the Grand Jury over 2 ounces of cocaine in the vicinity of Bay Street and Broad Street, on Staten Island.

75. On or about December 13, 2023, in a coded and cryptic telephone conversation, **GARY** agreed to sell over a ½ ounce of cocaine to a police officer known to the Grand Jury, on December 14, 2023, in the vicinity of 691 Bay Street, on Staten Island.

76. On or about December 13, 2023, **GARY** communicated with **MAZ** through text message.

77. On or about December 13, 2023, in a coded and cryptic telephone conversation, **MAZ** agreed to give **GARY** over a ½ ounce of cocaine for **GARY** to sell to a police officer known to the Grand Jury.

78. On or about December 13, 2023, in a coded and cryptic telephone conversation, **MAZ** ordered over a ½ ounce of cocaine from [REDACTED].

79. On or about December 13, 2023, **MAZ** called [REDACTED].

80. On or about December 13, 2023, **MAZ** communicated with [REDACTED] through text message.

81. On or about December 13, 2023, ██████ communicated with **MAZ** through text message.
82. On or about December 13, 2023, **MAZ** drove to the vicinity of 220 Osgood Avenue, on Staten Island.
83. On or about December 13, 2023, **MAZ** met with ██████ in the vicinity of 220 Osgood Avenue, on Staten Island.
84. On or about December 13, 2023, ██████ gave **MAZ** over a ½ ounce of cocaine in the vicinity of 220 Osgood Avenue, on Staten Island.
85. On or about December 14, 2023, **GARY** communicated with **MAZ** through text message.
86. On or about December 14, 2023, in a coded and cryptic telephone conversation, **MAZ** and **GARY** discussed the price for the cocaine **MAZ** agreed to give to **GARY**.
87. On or about December 14, 2023, **GARY** instructed a police officer known to the Grand Jury to pick up **GARY** in the vicinity of 101 Myrtle Avenue, on Staten Island.
88. On or about December 14, 2023, **GARY** instructed a police officer known to the Grand Jury to drive to the vicinity of 691 Bay Street, on Staten Island.
89. On or about December 14, 2023, **GARY** received a sum of United States currency from a police officer known to the Grand Jury.
90. On or about December 14, 2023, **GARY** met with **MAZ** inside of 703 Bay Street, on Staten Island.
91. On or about December 14, 2023, **MAZ** gave **GARY** over a ½ ounce of cocaine inside of 703 Bay Street, on Staten Island.
92. On or about December 14, 2023, **GARY** gave a police officer known to the Grand Jury over a ½ ounce of cocaine in the vicinity of Bay Street and Broad Street, on Staten Island.
93. On or about December 30, 2023, in a telephone conversation, **MAZ** and **GARY** discussed the location of a police officer known to the Grand Jury.
94. On or about December 31, 2023, **GARY** communicated with **MAZ** through text message.
95. On or about January 3, 2024, in a coded and cryptic telephone conversation, **GARY** agreed to sell a police officer known to the Grand Jury over 2 ounces of cocaine, on January 4, 2024, in the vicinity of 691 Bay Street, on Staten Island.

96. On or about January 3, 2024, in a coded and cryptic telephone conversation, **MAZ** ordered over 2 ounces of cocaine from [REDACTED].
97. On or about January 3, 2024, **GARY** called **MAZ**.
98. On or about January 4, 2024, in a coded and cryptic text message, **GARY** ordered over 2 ounces of cocaine from **MAZ**.
99. On or about January 4, 2024, **MAZ** called [REDACTED].
100. On or about January 4, 2024, **GARY** communicated with **MAZ** through text message.
101. On or about January 4, 2024, **MAZ** communicated with **GARY** through text message.
102. On or about January 4, 2024, [REDACTED] drove to the vicinity of 703 Bay Street, on Staten Island.
103. On or about January 4, 2024, [REDACTED] met with **MAZ** inside of 703 Bay Street, on Staten Island.
104. On or about January 4, 2024, [REDACTED] gave **MAZ** over 2 ounces of cocaine inside of 703 Bay Street, on Staten Island.
105. On or about January 4, 2024, **GARY** instructed a police officer known to the Grand Jury to pick up **GARY** in the vicinity of 101 Myrtle Avenue, on Staten Island.
106. On or about January 4, 2024, **GARY** instructed a police officer known to the Grand Jury to drive to the vicinity of 691 Bay Street, on Staten Island.
107. On or about January 4, 2024, **GARY** received a sum of United States currency from a police officer known to the Grand Jury.
108. On or about January 4, 2024, **GARY** met with **MAZ** inside of 703 Bay Street, on Staten Island.
109. On or about January 4, 2024, **MAZ** gave **GARY** over 2 ounces of cocaine inside of 703 Bay Street, on Staten Island.
110. On or about January 4, 2024, **GARY** gave a police officer known to the Grand Jury over 2 ounces of cocaine in the vicinity of 690 Bay Street, on Staten Island.

111. On or about January 9, 2024, in a coded and cryptic telephone conversation, **GARY** agreed to sell over a ½ ounce of cocaine to a police officer known to the Grand Jury, on January 10, 2024, in the vicinity of 691 Bay Street, on Staten Island.

112. On or about January 9, 2024, in a coded and cryptic telephone conversation, **GARY** ordered over a ½ ounce of cocaine for the next day, January 10, 2024, from **MAZ**.

113. On or about January 9, 2024, in a coded and cryptic telephone conversation, **MAZ** told **MELISSA** to meet **GARY** the next day, on January 10, 2024.

114. On or about January 9, 2024, in a coded and cryptic telephone conversation, **MELISSA** and **MAZ** discussed the cocaine order for **GARY**.

115. On or about January 9, 2024, in a coded and cryptic telephone conversation, **MAZ** instructed [REDACTED] to meet **MELISSA** and give **MELISSA** over a ½ ounce of cocaine the next day, on January 10, 2024.

116. On or about January 9, 2024, in a coded and cryptic telephone conversation, **MAZ** instructed **MELISSA** to meet [REDACTED] to receive over a ½ ounce of cocaine to give to **GARY** the next day, on January 10, 2024.

117. On or about January 10, 2024, [REDACTED] called **MAZ**.

118. On or about January 10, 2024, [REDACTED] drove to the vicinity of 703 Bay Street, on Staten Island.

119. On or about January 10, 2024, [REDACTED] met **MELISSA** in front of 703 Bay Street, on Staten Island.

120. On or about January 10, 2024, [REDACTED] and **MELISSA** entered 703 Bay Street, on Staten Island.

121. On or about January 10, 2024, [REDACTED] gave **MELISSA** over a ½ ounce of cocaine inside of 703 Bay Street, on Staten Island.

122. On or about January 10, 2024, in a coded and cryptic telephone conversation, **MELISSA** told **MAZ** that **MELISSA** met with [REDACTED] and received over a ½ ounce of cocaine.

123. On or about January 10, 2024, **GARY** communicated with **MAZ** through text message.

124. On or about January 10, 2024, **MAZ** instructed **GARY** to meet with **MELISSA**.

125. On or about January 10, 2024, in a coded and cryptic telephone conversation, **MAZ** instructed **MELISSA** to give **GARY** over a ½ ounce of cocaine in exchange for a sum of United States currency.

126. On or about January 10, 2024, in a coded and cryptic manner text message, **MAZ** informed **GARY** of the price for over a ½ ounce of cocaine.

127. On or about January 10, 2024, **GARY** instructed a police officer known to the Grand Jury to drive to the vicinity of 703 Bay Street, on Staten Island.

128. On or about January 10, 2024, **GARY** met with a police officer known to the Grand Jury in the vicinity of 700 Bay Street, on Staten Island.

129. On or about January 10, 2024, **GARY** received a sum of United States currency from a police officer known to the Grand Jury.

130. On or about January 10, 2024, **GARY** met with **MELISSA** inside of 701 Bay Street, on Staten Island.

131. On or about January 10, 2024, **MELISSA** gave **GARY** over a ½ ounce of cocaine inside of 701 Bay Street, on Staten Island.

132. On or about January 10, 2024, **GARY** gave a police officer known to the Grand Jury over a ½ ounce of cocaine in the vicinity of 700 Bay Street, on Staten Island.

133. On or about January 23, 2024, in a coded and cryptic telephone conversation, **GARY** agreed to sell a police officer known to the Grand Jury over 2 ounces of cocaine the next day, on January 24, 2024, in the vicinity of 691 Bay Street, on Staten Island.

134. On or about January 23, 2024, in a coded and cryptic telephone conversation, **GARY** ordered over 2 ounces of cocaine for the next day, January 24, 2024, from **MAZ**.

135. On or about January 23, 2024, in a coded and cryptic telephone conversation, **MAZ** ordered over 2 ounces of cocaine from [REDACTED].

136. On or about January 23, 2024, [REDACTED] called **MAZ**.

137. On or about January 23, 2024, [REDACTED] drove to the vicinity of 703 Bay Street, on Staten Island.

138. On or about January 23, 2024, [REDACTED] met with **MAZ** inside of 703 Bay Street, on Staten Island.

139. On or about January 23, 2024, [REDACTED] gave **MAZ** over 2 ounces of cocaine inside of 703 Bay Street, on Staten Island.

140. On or about January 24, 2024, in a coded and cryptic telephone conversation, **GARY** agreed to postpone the sale of over 2 ounces of cocaine to a police officer known to the Grand Jury to the following day, January 25, 2024.

141. On or about January 25, 2024, **GARY** communicated with **MAZ** through text message.

142. On or about January 25, 2024, **MAZ** communicated with **GARY** through text message.

143. On or about January 25, 2024, **GARY** instructed a police officer known to the Grand Jury to pick up **GARY** in the vicinity of 71 Central Avenue, on Staten Island.

144. On or about January 25, 2024, **GARY** instructed a police officer known to the Grand Jury to drive to the vicinity of 691 Bay Street, on Staten Island.

145. On or about January 25, 2024, **GARY** received a sum of United States currency from a police officer known to the Grand Jury.

146. On or about January 25, 2024, **GARY** met with **MAZ** inside of 703 Bay Street, on Staten Island.

147. On or about January 25, 2024, **MAZ** gave **GARY** over 2 ounces of cocaine inside of 703 Bay Street, on Staten Island.

148. On or about January 25, 2024, **GARY** gave a police officer known to the Grand Jury over 2 ounces of cocaine in the vicinity of 690 Bay Street, on Staten Island.

149. On or about February 7, 2024, **GARY** agreed to sell over a ½ ounce of cocaine to a police officer known to the Grand Jury, on February 8, 2024, in the vicinity of 691 Bay Street, on Staten Island.

150. On or about February 7, 2024, in a coded and cryptic telephone conversation, **GARY** ordered over a ½ ounce of cocaine for the next day, February 8, 2024, from **MAZ**.

151. On or about February 7, 2024, in a coded and cryptic telephone conversation, **MAZ** ordered over a ½ ounce of cocaine for the next day, February 8, 2024, from [REDACTED].

152. On or about February 8, 2024, **GARY** communicated with **MAZ** through text message.

153. On or about February 8, 2024, **MAZ** communicated with **GARY** through text message.

154. On or about February 8, 2024, in a coded and cryptic telephone conversation, [REDACTED] and **MAZ** discussed the quantity of the order of cocaine and the time of the transaction.

155. On or about February 8, 2024, **GARY** agreed to sell over 2 ounces of cocaine to a police officer known to the Grand Jury instead of a ½ ounce of cocaine, later that day.

156. On or about February 8, 2024, in a coded and cryptic text message with **MAZ**, **GARY** increased the order of cocaine to over 2 ounces of cocaine.

157. On or about February 8, 2024, in a coded and cryptic telephone conversation, **MAZ** ordered an increased amount of cocaine from [REDACTED].

158. On or about February 8, 2024, **MAZ** called **GARY**.

159. On or about February 8, 2024, **MAZ** called [REDACTED].

160. On or about February 8, 2024, [REDACTED] drove to the vicinity of 703 Bay Street, on Staten Island.

161. On or about February 8, 2024, **MAZ** met with [REDACTED] inside of 691 Bay Street, on Staten Island.

162. On or about February 8, 2024, [REDACTED] gave **MAZ** over 2 ounces of cocaine inside of 691 Bay Street, on Staten Island.

163. On or about February 8, 2024, **GARY** instructed a police officer known to the Grand Jury to drive to the vicinity of 691 Bay Street, on Staten Island.

164. On or about February 8, 2024, **GARY** met with a police officer known to the Grand Jury in the vicinity of 694 Bay Street, on Staten Island.

165. On or about February 8, 2024, **GARY** received a sum of United States currency from a police officer known to the Grand Jury.

166. On or about February 8, 2024, **GARY** met with **MAZ** inside of 691 Bay Street, on Staten Island.

167. On or about February 8, 2024, **MAZ** gave **GARY** over 2 ounces of cocaine inside of 691 Bay Street, on Staten Island.

168. On or about February 8, 2024, **GARY** gave a police officer known to the Grand Jury over 2 ounces of cocaine in the vicinity of 694 Bay Street, on Staten Island.

169. On or about February 20, 2024, in a coded and cryptic telephone conversation, **GARY** agreed to sell a police officer known to the Grand Jury over a ½ ounce of cocaine on February 22, 2024, in the vicinity of 691 Bay Street, on Staten Island.

170. On or about February 20, 2024, in a coded and cryptic telephone conversation, **GARY** ordered over a ½ ounce of cocaine for February 22, 2024, from **MAZ**.

171. On or about February 21, 2024, in a coded and cryptic telephone conversation, **MAZ** ordered over a ½ ounce of cocaine from [REDACTED].

172. On or about February 21, 2024, [REDACTED] drove to the vicinity of 703 Bay Street, on Staten Island.

173. On or about February 22, 2024, **GARY** called **MAZ**.

174. On or about February 22, 2024, **GARY** instructed a police officer known to the Grand Jury to drive to the vicinity of 691 Bay Street, on Staten Island.

175. On or about February 22, 2024, **GARY** met with a police officer known to the Grand Jury in the vicinity of Bay Street and Dock Street, on Staten Island.

176. On or about February 22, 2024, **GARY** received a sum of United States currency from a police officer known to the Grand Jury.

177. On or about February 22, 2024, **GARY** met **MAZ** inside of 691 Bay Street, on Staten Island.

178. On or about February 22, 2024, **MAZ** gave **GARY** over a ½ ounce of cocaine, inside of 691 Bay Street, on Staten Island.

179. On or about February 22, 2024, **GARY** gave a police officer known to the Grand Jury over a ½ ounce of cocaine in the vicinity of Bay Street and Dock Street, on Staten Island.

180. On or about March 5, 2024, in a coded and cryptic telephone conversation, **GARY** agreed to sell a police officer known to the Grand Jury over a ½ ounce of cocaine the next day, March 6, 2024, in the vicinity of 691 Bay Street, on Staten Island.

181. On or about March 5, 2024, in a coded and cryptic telephone conversation, **GARY** ordered over a ½ ounce of cocaine for the next day, March 6, 2024, from **MAZ**.

182. On or about March 6, 2024, **GARY** communicated with **MAZ** through text message.

183. On or about March 6, 2024, **MAZ** communicated with **GARY** through text message.

184. On or about March 6, 2024, **GARY** instructed a police officer known to the Grand Jury to drive to the vicinity of 691 Bay Street, on Staten Island.

185. On or about March 6, 2024, **GARY** met with a police officer known to the Grand Jury in the vicinity of 700 Bay Street, on Staten Island.

186. On or about March 6, 2024, **GARY** received a sum of United States currency from a police officer known to the Grand Jury.

187. On or about March 6, 2024, **GARY** met with **MAZ** inside of 703 Bay Street, on Staten Island.

188. On or about March 6, 2024, **MAZ** gave **GARY** over a ½ ounce of cocaine, inside of 703 Bay Street, on Staten Island.

189. On or about March 6, 2024, **GARY** gave a police officer known to the Grand Jury over a ½ ounce of cocaine in the vicinity of 700 Bay Street, on Staten Island.

190. On or about March 20, 2024, in a coded and cryptic telephone conversation, **GARY** agreed to sell a police officer known to the Grand Jury over a ½ ounce of cocaine the next day, March 21, 2024, in the vicinity of 691 Bay Street, on Staten Island.

191. On or about March 20, 2024, in a coded and cryptic telephone conversation, **GARY** ordered over a ½ ounce of cocaine for the next day, March 21, 2024, from **MAZ**.

192. On or about March 21, 2024, **GARY** communicated with **MAZ** and increased the order of cocaine.

193. On or about March 21, 2024, in a coded and cryptic telephone conversation, **MAZ** and **GARY** discussed the cocaine transaction.

194. On or about March 21, 2024, **GARY** communicated with **MAZ** through text message.

195. On or about March 21, 2024, **GARY** instructed a police officer known to the Grand Jury to drive to the vicinity of 691 Bay Street, on Staten Island.

196. On or about March 21, 2024, **GARY** met with a police officer known to the Grand Jury in the vicinity of Bay Street and Dock Street, on Staten Island.

197. On or about March 21, 2024, **GARY** received a sum of United States currency from a police officer known to the Grand Jury.

198. On or about March 21, 2024, **GARY** met with **MAZ** inside of 703 Bay Street, on Staten Island.

199. On or about March 21, 2024, **MAZ** gave **GARY** over a ½ ounce of cocaine, inside of 703 Bay Street, on Staten Island.

200. On or about March 21, 2024, **GARY** gave a police officer known to the Grand Jury over a ½ ounce of cocaine in the vicinity of Bay Street and Dock Street, on Staten Island.

201. On or about April 3, 2024, in a coded and cryptic telephone conversation, **GARY** agreed to sell a police officer known to the Grand Jury over a ½ ounce of cocaine the next day, April 4, 2024, in the vicinity of 691 Bay Street, on Staten Island.

202. On or about April 3, 2024, in a coded and cryptic telephone conversation, **GARY** ordered a ½ ounce of cocaine for the next day, April 4, 2024, from **MAZ**.

203. On or about April 4, 2024, **GARY** communicated with **MAZ** through text message.

204. On or about April 4, 2024, **MAZ** communicated with **GARY** through text message.

205. On or about April 4, 2024, **GARY** instructed a police officer known to the Grand Jury to drive to the vicinity of 691 Bay Street, on Staten Island.

206. On or about April 4, 2024, **GARY** met with a police officer known to the Grand Jury in the vicinity of 694 Bay Street, on Staten Island.

207. On or about April 4, 2024, **GARY** received a sum of United States currency from a police officer known to the Grand Jury.

208. On or about April 4, 2024, **GARY** met with **MAZ** inside of 703 Bay Street, on Staten Island.

209. On or about April 4, 2024, **MAZ** gave **GARY** over a ½ ounce of cocaine inside of 703 Bay Street, on Staten Island.

210. On or about April 4, 2024, **GARY** gave a police officer known to the Grand Jury over a ½ ounce of cocaine, in the vicinity of 694 Bay Street, on Staten Island.

## COUNT TWO

**AND THE GRAND JURY AFORESAID** by this Indictment, further accuses the defendants, **ETTORE MAZZEI**, a/k/a “**MAZ**,” (hereinafter “**MAZ**”), **GARY PULLICE** (hereinafter “**GARY**”), and **MELISSA MAZZEI**, (hereinafter “**MELISSA**”), of the crime of:

**CONSPIRACY IN THE FOURTH DEGREE (P.L. §105.10-1)**, committed as follows:

The said defendants, in the Borough of Staten Island, County of Richmond, City and State of New York, and elsewhere, from on or about January 3, 2024, to on or about March 21, 2024, with intent that conduct constituting the crimes of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** and **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, said crimes being class B felonies, be performed, 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 felonies.

### PREAMBLE

It was part of the conspiracy for **MAZ**, **GARY**, and **MELISSA** to receive, package, and distribute quantities of heroin on Staten Island, New York, and elsewhere, and to collect the narcotics proceeds of those narcotics transactions.

It was also part of the conspiracy for **MAZ** and **MELISSA** to supply **GARY** with heroin to sell to his customers in Staten Island.

It was also part of the conspiracy for **MAZ**, **GARY**, and **MELISSA** to frequently communicate with each other and with customers, to plan, negotiate, and arrange for the sale and delivery of heroin.

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

### OVERT ACTS

In furtherance of said conspiracy, and to achieve the objects thereof, from on or about January 3, 2024, to on or about March 21, 2024, the following overt acts, among others, were committed:

1. On or about January 3, 2024, in a coded and cryptic telephone conversation, **GARY** agreed to sell a quantity of heroin to a police officer known to the Grand Jury the next day, January 4, 2024, in the vicinity of 691 Bay Street, on Staten Island.
2. On or about January 3, 2024, in a coded and cryptic telephone conversation, **GARY** ordered a quantity of heroin for the next day, January 4, 2024, from **MAZ**.

3. On or about January 4, 2024, **GARY** instructed a police officer known to the Grand Jury to pick up **GARY** in the vicinity of 101 Myrtle Avenue, on Staten Island.

4. On or about January 4, 2024, **GARY** instructed a police officer known to the Grand Jury to drive to the vicinity of 691 Bay Street, on Staten Island.

5. On or about January 4, 2024, **GARY** received a sum of United States currency from a police officer known to the Grand Jury.

6. On or about January 4, 2024, **GARY** communicated with **MAZ** through text message.

7. On or about January 4, 2024, **MAZ** communicated with **GARY** through text message.

8. On or about January 4, 2024, **GARY** met with **MAZ** inside of 691 Bay Street, on Staten Island.

9. On or about January 4, 2024, **MAZ** gave **GARY** a quantity of heroin, inside of 691 Bay Street, on Staten Island.

10. On or about January 4, 2024, **GARY** gave a police officer known to the Grand Jury a quantity of heroin in the vicinity of 690 Bay Street, on Staten Island.

11. On or about January 10, 2024, in a coded and cryptic telephone conversation, **GARY** agreed to sell a police officer known to the Grand Jury a quantity of heroin in the vicinity of Bay Street and Dock Street, on Staten Island.

12. On or about January 10, 2024, **GARY** met with **MELISSA** inside of 691 Bay Street, on Staten Island.

13. On or about January 10, 2024, in a coded and cryptic telephone conversation, **MELISSA** asked **MAZ** where he kept the heroin.

14. On or about January 10, 2024, **GARY** met with a police officer known to the Grand Jury in the vicinity of Bay Street and Dock Street, on Staten Island.

15. On or about January 10, 2024, **GARY** received a sum of United States currency from a police officer known to the Grand Jury.

16. On or about January 10, 2024, **GARY** met with **MELISSA** inside of 701 Bay Street, on Staten Island.

17. On or about January 10, 2024, **MELISSA** gave **GARY** a quantity of heroin inside of 701 Bay Street, on Staten Island.

18. On or about January 10, 2024, **GARY** gave a police officer known to the Grand Jury a quantity of heroin in the vicinity of Bay Street and Dock Street, on Staten Island.

19. On or about January 25, 2024, **GARY** met with a police officer known to the Grand Jury in the vicinity of 690 Bay Street, on Staten Island.

20. On or about January 25, 2024, **GARY** received a covert Electronic Benefit Card with the ability to purchase a quantity of goods worth a sum of a United States currency from a police officer known to the Grand Jury in exchange for a quantity of heroin.

21. On or about January 25, 2024, **GARY** met with **MAZ** inside of 703 Bay Street, on Staten Island.

22. On or about January 25, 2024, **MAZ** gave **GARY** a quantity of heroin inside of 703 Bay Street, on Staten Island.

23. On or about January 25, 2024, **GARY** and **MAZ** agreed to sell a quantity of heroin in exchange for the Electronic Benefit Card.

24. On or about January 25, 2024, **GARY** gave a quantity of heroin to a police officer known to the Grand Jury in the vicinity of 690 Bay Street, on Staten Island.

25. On or about March 21, 2024, **GARY** met with a police officer known to the Grand Jury in the vicinity of Bay Street and Dock Street, on Staten Island.

26. On or about March 21, 2024, **GARY** received a sum of United States currency from a police officer known to the Grand Jury.

27. On or about March 21, 2024, **GARY** met with **MAZ** inside of 691 Bay Street, on Staten Island.

28. On or about March 21, 2024, **MAZ** gave **GARY** a quantity of alleged heroin, inside of 691 Bay Street, on Staten Island.

29. On or about March 21, 2024, **GARY** gave a quantity of alleged heroin to a police officer known to the Grand Jury in the vicinity of Bay Street and Dock Street, on Staten Island.

### **COUNT THREE**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses the defendants, Ettore Mazzei and Gary Pulice, of the crime of:

**CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE (P.L. §220.39-1)**, committed as follows:

The said defendants, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about and between March 19, 2023 and March 20, 2023, knowingly and unlawfully sold a narcotic drug, namely, cocaine to a police officer known to the Grand Jury.

### **COUNT FOUR**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses the defendants, Ettore Mazzei and Gary Pulice, of the crime of:

**CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE (P.L. §220.39-1)**, committed as follows:

The said defendants, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about and between October 4, 2023 and October 5, 2023, knowingly and unlawfully sold a narcotic drug, namely, cocaine to a police officer known to the Grand Jury.

### **COUNT FIVE**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses the defendants, Ettore Mazzei and Gary Pulice, of the crime of:

**CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE (P.L. §220.41-1)**, committed as follows:

The said defendants, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about and between October 25, 2023 and October 26, 2023, knowingly and unlawfully sold one or more preparations, compounds, mixtures, or substances containing a narcotic drug, namely, cocaine, to a police officer known to the Grand Jury, and said preparations, compounds, mixtures, or substances were of an aggregate weight of one-half ounce and more.

**COUNT SIX**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses the defendants, Ettore Mazzei and Gary Pulice, of the crime of:

**CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE (P.L. §220.41-1)**, committed as follows:

The said defendants, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about and between November 7, 2023 and November 8, 2023, knowingly and unlawfully sold one or more preparations, compounds, mixtures, or substances containing a narcotic drug, namely, cocaine, to a police officer known to the Grand Jury, and said preparations, compounds, mixtures, or substances were of an aggregate weight of one-half ounce and more.

**COUNT SEVEN**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses the defendants, Ettore Mazzei, [REDACTED], and Gary Pulice, of the crime of:

**CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE (P.L. §220.41-1)**, committed as follows:

The said defendants, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about and between November 15, 2023 and November 16, 2023, knowingly and unlawfully sold one or more preparations, compounds, mixtures, or substances containing a narcotic drug, namely, cocaine, to a police officer known to the Grand Jury, and said preparations, compounds, mixtures, or substances were of an aggregate weight of one-half ounce and more.

**COUNT EIGHT**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses the defendants, Ettore Mazzei, [REDACTED], and Gary Pulice, of the crime of:

**CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE (P.L. §220.43-1)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about and between November 28, 2023 and November 30, 2023, knowingly and unlawfully sold one or more preparations, compounds, mixtures, or substances containing a narcotic drug, namely, cocaine, to a police officer known to the Grand Jury, and said preparations, compounds, mixtures, or substances were of an aggregate weight of two ounces and more.

**COUNT NINE**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses the defendants, Ettore Mazzei, [REDACTED], and Gary Pulice, of the crime of:

**CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE (P.L. §220.41-1)**, committed as follows:

The said defendants, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about and between December 13, 2023 and December 14, 2023, knowingly and unlawfully sold one or more preparations, compounds, mixtures, or substances containing a narcotic drug, namely, cocaine, to a police officer known to the Grand Jury, and said preparations, compounds, mixtures, or substances were of an aggregate weight of one-half ounce and more.

**COUNT TEN**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses the defendants, Ettore Mazzei, [REDACTED], and Gary Pulice, of the crime of:

**CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE (P.L. §220.43-1)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about and between January 3, 2024 and January 4, 2024, knowingly and unlawfully sold one or more preparations, compounds, mixtures, or substances containing a narcotic drug, namely, cocaine, to a police officer known to the Grand Jury, and said preparations, compounds, mixtures, or substances were of an aggregate weight of two ounces and more.

**COUNT ELEVEN**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses the defendants, Ettore Mazzei and Gary Pulice, of the crime of:

**CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE (P.L. §220.39-1)**, committed as follows:

The said defendants, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about and between January 3, 2024 and January 4, 2024, knowingly and unlawfully sold a narcotic drug, namely, heroin, to a police officer known to the Grand Jury.

**COUNT TWELVE**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses the defendants, Ettore Mazzei and Gary Pulice, of the crime of:

**CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE (P.L. §220.39-1)**, committed as follows:

The said defendants, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about and between January 3, 2024 and January 4, 2024, knowingly and unlawfully sold a narcotic drug, namely, fentanyl, to a police officer known to the Grand Jury.

**COUNT THIRTEEN**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses the defendants, Ettore Mazzei, [REDACTED], Gary Pulice, and Melissa Mazzei, of the crime of:

**CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE (P.L. §220.41-1)**, committed as follows:

The said defendants, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about and between January 9, 2024 and January 10, 2024, knowingly and unlawfully sold one or more preparations, compounds, mixtures, or substances containing a narcotic drug, namely, cocaine, to a police officer known to the Grand Jury, and said preparations, compounds, mixtures, or substances were of an aggregate weight of one-half ounce and more.

**COUNT FOURTEEN**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses the defendants, Ettore Mazzei, Melissa Mazzei, and Gary Pulice, of the crime of:

**CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE (P.L. §220.39-1)**, committed as follows:

The said defendants, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about and between January 9, 2024 and January 10, 2024, knowingly and unlawfully sold a narcotic drug, namely, heroin, to a police officer known to the Grand Jury.

**COUNT FIFTEEN**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses the defendants, Ettore Mazzei, Melissa Mazzei, and Gary Pulice, of the crime of:

**CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE (P.L. §220.39-1)**, committed as follows:

The said defendants, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about and between January 9, 2024 and January 10, 2024, knowingly and unlawfully sold a narcotic drug, namely, fentanyl, to a police officer known to the Grand Jury.

**COUNT SIXTEEN**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses the defendants, Ettore Mazzei, [REDACTED], and Gary Pulice, of the crime of:

**CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE (P.L. §220.43-1)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about and between January 23, 2024 and January 25, 2024, knowingly and unlawfully sold one or more preparations, compounds, mixtures, or substances containing a narcotic drug, namely, cocaine, to a police officer known to the Grand Jury, and said preparations, compounds, mixtures, or substances were of an aggregate weight of two ounces and more.

**COUNT SEVENTEEN**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses the defendants, Ettore Mazzei and Gary Pulice, of the crime of:

**CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE (P.L. §220.39-1)**, committed as follows:

The said defendants, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about and between January 23, 2024 and January 25, 2024, knowingly and unlawfully sold a narcotic drug, namely, heroin, to a police officer known to the Grand Jury.

**COUNT EIGHTEEN**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses the defendants, Ettore Mazzei and Gary Pulice, of the crime of:

**CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE (P.L. §220.39-1)**, committed as follows:

The said defendants, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about and between January 23, 2024 and January 25, 2024, knowingly and unlawfully sold a narcotic drug, namely, fentanyl, to a police officer known to the Grand Jury.

**COUNT NINETEEN**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses the defendants, Ettore Mazzei and Gary Pulice, of the crime of:

**CRIMINAL USE OF A PUBLIC BENEFIT CARD IN THE SECOND DEGREE (P.L. §158.30-2)**, committed as follows:

The said defendants, in the Borough of Staten Island, Count of Richmond, City and State of New York, on or about and between January 23, 2024 and January 25, 2024, knowingly obtained a public benefit card in exchange for a benefit, namely, heroin.

**COUNT TWENTY**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses the defendants, Ettore Mazzei and Gary Pulice, of the crime of:

**CRIMINAL USE OF A PUBLIC BENEFIT CARD IN THE SECOND DEGREE (P.L. §158.30-2)**, committed as follows:

The said defendants, in the Borough of Staten Island, Count of Richmond, City and State of New York, on or about and between January 23, 2024 and January 25, 2024, knowingly obtained a public benefit card in exchange for a benefit, namely, fentanyl.

**COUNT TWENTY-ONE**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses the defendants, Ettore Mazzei, [REDACTED], and Gary Pulice, of the crime of:

**CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE (P.L. §220.43-1)**, committed as follows:

The said defendants, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about and between February 7, 2024 and February 8, 2024, knowingly and unlawfully sold one or more preparations, compounds, mixtures, or substances containing a narcotic drug, namely, cocaine, to a police officer known to the Grand Jury, and said preparations, compounds, mixtures, or substances were of an aggregate weight of two ounces and more.

**COUNT TWENTY-TWO**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses the defendants, Ettore Mazzei, [REDACTED], and Gary Pulice, of the crime of:

**CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE (P.L. §220.41-1)**, committed as follows:

The said defendants, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about and between February 20, 2024 and February 22, 2024, knowingly and unlawfully sold one or more preparations, compounds, mixtures, or substances containing a narcotic drug, namely, cocaine, to a police officer known to the Grand Jury, and said preparations, compounds, mixtures, or substances were of an aggregate weight of one-half ounce and more.

**COUNT TWENTY-THREE**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses the defendants, Ettore Mazzei and Gary Pulice, of the crime of:

**CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE (P.L. §220.41-1)**, committed as follows:

The said defendants, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about and between March 5, 2024 and March 6, 2024, knowingly and unlawfully sold one or more preparations, compounds, mixtures, or substances containing a narcotic drug, namely, cocaine, to a police officer known to the Grand Jury, and said preparations, compounds, mixtures, or substances were of an aggregate weight of one-half ounce and more.

**COUNT TWENTY-FOUR**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses the defendants, Ettore Mazzei and Gary Pulice, of the crime of:

**CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE (P.L. §220.41-1)**, committed as follows:

The said defendants, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about and between March 20, 2024 and March 21, 2024, knowingly and unlawfully sold one or more preparations, compounds, mixtures, or substances containing a narcotic drug, namely, cocaine, to a police officer known to the Grand Jury, and said preparations, compounds, mixtures, or substances were of an aggregate weight of one-half ounce and more.

**COUNT TWENTY-FIVE**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses the defendants, Ettore Mazzei and Gary Pulice, of the crime of:

**CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE (P.L. §220.39-1)**, committed as follows:

The said defendants, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about and between March 20, 2024 and March 21, 2024, knowingly and unlawfully sold a narcotic drug, namely, fentanyl, to a police officer known to the Grand Jury.

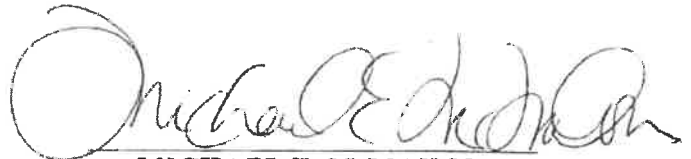
**COUNT TWENTY-SIX**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses the defendants, Ettore Mazzei and Gary Pulice, of the crime of:

**CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE (P.L. §220.41-1)**, committed as follows:

The said defendants, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about and between April 3, 2024 and April 4, 2024, knowingly and unlawfully sold one or more preparations, compounds, mixtures, or substances containing a narcotic drug, namely, cocaine, to a police officer known to the Grand Jury, and said preparations, compounds, mixtures, or substances were of an aggregate weight of one-half ounce and more.

Dated: May 17, 2024  
Staten Island, NY



**MICHAEL E. McMAHON  
DISTRICT ATTORNEY  
RICHMOND COUNTY**



**A TRUE BILL**

*Acting* **FOREPERSON**

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF RICHMOND: CRIMINAL TERM**

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**THE PEOPLE OF THE STATE OF NEW YORK**

*-against-*

**ETTORE MAZZEI, a/k/a "MAZ."  
GARY PULICE, [REDACTED]**

**and**

**MELISSA MAZZEI**

*Defendants.*

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**INDICTMENT**

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*Office Origin Sealed  
as to All Counts*

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