















PRESS RELEASE

FOR IMMEDIATE RELEASE

December 16, 2010

Clinton County District Attorney Andrew J. Wylie announced today that the Clinton County District Attorney's Office, United States Attorneys Office, Essex County District Attorney's Office, the Adirondack Drug Task Force and the New York State Police Troop B Narcotics Task Force conducted a unified law enforcement round up of thirty-one (31) individuals who have recently been indicted by the Clinton County Grand Jury. The following defendants have been arrested this week and have been arraigned already or will be arraigned in Clinton County Court today:

1. Ryan Z. Smith

Age 25

129 Court Street, Plattsburgh, N.Y.



Ryan Z. Smith was arraigned upon an indictment charging Criminal Sale of Marihuana Second Degree, a class D felony, and Criminal Possession of Marihuana Third Degree, a class E felony. The defendant is alleged to have sold more than four ounces of marihuana on November 4, 2009 in the City of Plattsburgh. Hon. Kevin K. Ryan set bail in the amount of \$25,000.00 cash or \$50,000.00 bond. Smith's case is rescheduled for pre trial conference on February 28, 2011. If convicted, the defendant could be sentenced to up to 2 ½ years in state prison. The defendant is represented by Erin Mindoro, Esq.

2. Robert V. Auchenbaugh

Age 43

60 Sailly Ave., Apt. 1, Plattsburgh, NY



Robert V. Auchenbaugh was arraigned upon an indictment charging Criminal Sale of a Controlled Substance Third Degree and Criminal Possession of a Controlled Substance Third Degree, both class B felonies. The defendant is alleged to have sold morphine on June 12, 2009 in the City of Plattsburgh. Hon. Patrick R. McGill set bail in the amount of \$10,000.00 cash or \$20,000.00 bond. Auchenbaugh's case is rescheduled for pre trial conference on February 22, 2011. If convicted, the

defendant could be sentenced up to 9 years in state prison. Auchenbaugh is represented by Heather Maure, Esq.



Pauline E. (Cota) Barber was arraigned Tuesday upon an indictment charging two counts of Criminal Sale of a Controlled Substance Third Degree and two counts of Criminal Possession of a Controlled Substance Third Degree, all class B felonies. The defendant is alleged to have sold Oxycodone on August 24, 2010 in the Town of Plattsburgh and September 3, 2010 in the Town of Chazy. Hon. Patrick R. McGill set bail in the amount of \$10,000.00 cash or \$20,000.00 bond, which Barber later posted. Barber's case is

rescheduled for pre trial conference on February 23, 2011. If convicted, the defendant could be sentenced to up to 18 years in state prison. Barber is represented by Diane Webster-Brady, Esq.

4. Raymond F. Blow

Age 61

36 Pepper Hill Road, Mooers Forks, NY



Raymond F. Blow was arraigned Tuesday upon an indictment charging Criminal Sale of a Controlled Substance Third Degree and Criminal Possession of a Controlled Substance Third Degree, both class B felonies, and the class C felony of Criminal Sale of a controlled Substance in the Fourth Degree and the class D felony of Criminal Possession of a Controlled Substance in the Fifth Degree. The defendant is alleged to have sold Dihydrocodeinone with Acetaminophen on March 5, 2010 in the Town of Altona, and Oxycodone on April 8, 2010 in the Town of Mooers. Hon. Patrick R. McGill set bail in

the amount of \$10,000.00 cash or \$20,000.00 bond, which Blow later posted. Blow's case is rescheduled for pre trial conference on February 23, 2011. If convicted, the defendant could be sentenced to up to 14 ½ years in state prison. The defendant is represented by Mark Anderson, Esq.

5. Marshal J. Brothers

Age 68

710 Hallock Rd, Peru, N.Y.



Marshal J. Brothers was arraigned upon an indictment charging Criminal Sale of a Controlled Substance Third Degree and Criminal Possession of a Controlled Substance Third Degree both class B felonies. The defendant is alleged to have sold Oxycodone on April 29, 2009 in the City of Plattsburgh. Hon. Kevin K. Ryan set bail in the amount of \$2,500.00 cash or \$5,000.00 bond. Brothers' case is rescheduled for pre trial conference on February 24, 2011. If convicted, the defendant could be sentenced up to 9 years in state prison. Brothers is represented by Keith Bruno, Esq.

6. Justin J. Brunell

Age 23

25 Vintage Estates, Plattsburgh, N.Y.



Justin J. Brunell was arraigned upon an indictment charging two counts of Criminal Sale of a Controlled Substance Fourth Degree, both class C felonies, and two counts of Criminal Possession of a Controlled Substance Fifth Degree, both class D felonies. The defendant is alleged to have sold Dihydrocodeinone with Acetaminophen on July 1, 2010 and July 6, 2010 in the City of Plattsburgh. Hon. Patrick R. McGill set bail in the amount of \$5,000.00 cash or \$10,000.00 bond. Brunell's case is rescheduled for pre trial conference on February 22, 2011. If convicted, the defendant could be sentenced up to 11 years in state prison. Brunell is represented by Diane Webster-Brady, Esq.

7. Chad M. Burdo

Age 31

312 LaPlante Rd, West Chazy, N.Y.



Chad M. Burdo was arraigned upon an indictment charging two counts of Criminal Sale of a Controlled Substance Third Degree and two counts of Criminal Possession of a Controlled Substance Third Degree, all class B felonies. The defendant is alleged to have sold cocaine on July 12, 2010 and sold Oxycodone on July 20, 2010 with each sale taking place in the Town of Chazy. Hon. Kevin K. Ryan set bail in the amount of \$10,000.00 cash or \$10,000.00 bond. Burdo's case is rescheduled for pre trial conference on February 24, 2011. If convicted, the defendant could be sentenced up to 18 years in state prison. Burdo is represented by John Carter, Esq.

8. Crystal A. Crombleholme

Age 31

17 Bittersweet Lane, Morrisonville, N.Y.



Crystal A. Crombleholme was arraigned upon an indictment charging two counts of Criminal Sale of a Controlled Substance Third Degree and two counts of Criminal Possession of a Controlled Substance Third Degree, all class B felonies. The defendant is alleged to have sold cocaine on May 17, 2010 and June 1, 2010, with each sale taking place in the City of Plattsburgh. Hon. Kevin K. Ryan set bail in the amount of \$5,000.00

cash or \$10,000.00 bond. Crombleholme's case is rescheduled for pre trial conference on February 22, 2011. If convicted, the defendant could be sentenced up to 18 years in state prison. The defendant is represented by Keith Bruno, Esq.

9. Glenn L. Crouse

Age 39

9 Broad Street, Plattsburgh, N.Y.



Glenn L. Crouse was arraigned upon an indictment charging Criminal Sale of a Controlled Substance Fourth Degree, a class C felony, and Criminal Possession of a Controlled Substance Fifth Degree, a class D felony. The defendant is alleged to have sold Dihydrocodeinone with Acetaminophen on July 7, 2010 in the Town of Plattsburgh. Hon. Kevin K. Ryan set bail in the amount of \$20,000.00 cash or \$40,000.00 bond. Crouse's case is rescheduled for pre trial conference on February 24, 2011. If convicted, the defendant could be sentenced up to 8 years in state prison. Crouse is represented by John Carter, Esq.

10. Jeremy M. Dame

Age 34

1 Pine Street, Apt. 2, Plattsburgh, N.Y.



Jeremy M. Dame was arraigned upon an indictment charging Criminal Sale of a Controlled Substance Fourth Degree, a class C felony, and Criminal Possession of a Controlled Substance Fifth Degree, a class D felony. The defendant is alleged to have sold Buprenorphine on June 22, 2010 in the City of Plattsburgh. Hon. Patrick R. McGill set bail in the amount of \$5,000.00 cash or \$10,000.00 bond. Dame's case is rescheduled

for pre trial conference on February 22, 2011. If convicted, the defendant could be sentenced to up to 5 ½ years in state prison. Dame is represented by Heather Maure, Esq.

11. Nichole M. Dominy

Age 21

20 River St, Chazy, N.Y.



Nichole M. Dominy was arraigned upon an indictment charging two counts of Criminal Sale of a Controlled Substance Fourth Degree, a class C felony, and two counts of Criminal Possession of a Controlled Substance Fifth Degree, a class D felony. The defendant is alleged to have sold Dihydrocodeinone with Acetaminophen on both May 17, 2010 and June 24, 2010 in the Town of Champlain. Hon. Kevin K. Ryan set bail in the amount of \$2,500.00 cash or \$5,000.00 bond. Dominy's case is rescheduled for pre trial conference on February 24, 2011. If convicted, the defendant could be sentenced to

up to 11 years in state prison. Dominy is represented by Kristofer Michaud, Esq.

12. Jamie L. Dumas

Age 24

15 Tyrell Avenue, Apt. E, Plattsburgh, N.Y.



Jamie L. Dumas was arraigned upon an indictment charging two counts of Criminal Sale of a Controlled Substance Fifth Degree, and two counts of Criminal Possession of a Controlled Substance Fifth Degree, all class D felonies. The defendant is alleged to have sold Ecstasy on June 11, 2010 and June 14, 2010 in the City of Plattsburgh. Hon. Kevin K. Ryan released Dumas on Pre Trial Release. Dumas's case is rescheduled for pre trial

conference on February 22, 2011. If convicted, the defendant could be sentenced up to 5 years in state prison. Dumas is represented by Erin Mindoro, Esq.

13. Cory K. Favreau

Age 29

54 Underwood Avenue, Plattsburgh, N.Y.



Cory K. Favreau was arraigned Tuesday upon an indictment charging two counts of Criminal Sale of a Controlled Substance Fourth Degree, a class C felony, and two counts of Criminal Possession of a Controlled Substance Fifth Degree, a class D felony. The defendant is alleged to have sold methadone on July 8, 2010 in the City of Plattsburgh and Dihydrocodeinone with Acetaminophen July 20, 2010 in the Town of Schuyler Falls. Hon. Kevin K. Ryan set bail in the amount \$25,000.00 cash or \$50,000.00 bond Favreau's case

is rescheduled for December 20, 2010 for the defendant to appear with a lawyer, at which time his case will be scheduled for a pre-trial conference on February 23 or 24, 2011. If convicted, the defendant could be sentenced up to 16 years in state prison. Favreau is not yet represented by an attorney

14. Michael L. Finsterer

Age 31

3 Weed Street, Plattsburgh, NY



Michael L. Finsterer was arraigned Tuesday upon an indictment charging two counts of Criminal Sale of a Controlled Substance Third Degree and two counts Criminal Possession of a Controlled Substance Third Degree, all class B felonies. The defendant is alleged to have sold morphine on June 10, 2010 and June 16, 2010 in the City of Plattsburgh. Hon. Patrick R. McGill set bail in the amount of \$20,000.00 cash or

\$40,000.00 bond. Finsterer's case is rescheduled for pre trial conference on February 23, 2011. If convicted, the defendant could be sentenced up to 24 years in state prison. The defendant is represented by Mark Anderson, Esq.

15. Jessica R. Gay

Age 27

471 Emery Road, Mooers Forks, N.Y.



Jessica R. Gay was arraigned upon an indictment charging four counts of Criminal Sale of a Controlled Substance Third Degree and four counts of Criminal Possession of a Controlled Substance Third Degree, all class B felonies. The defendant is alleged to have sold cocaine on May 17, 2010 in the City of Plattsburgh, on two separate occasions on May 18, 2010 in the City of Plattsburgh and the Town of Plattsburgh and June 2, 2010 in the Town of Plattsburgh. Hon. Kevin K. Ryan set bail in the amount of \$20,000.00 cash or \$40,000.00 bond. Gay's case is rescheduled for pre trial conference on February 24, 2011. If convicted, the defendant could be sentenced up to 36 years in state prison. The defendant appeared with Kristofer Michaud, Esq. for arraignment purposes.

16. Charles V. Goddard, Jr.

Age 29

1 Pine Street, Apt. 2, Plattsburgh, N.Y.



Charles V. Goddard, Jr. was arraigned upon an indictment charging Criminal Sale of a Controlled Substance Fourth Degree, a class C felony, and Criminal Possession of a Controlled Substance Fifth Degree, a class D felony. The defendant is alleged to have sold Buprenorphine on July 16, 2010 in the City of Plattsburgh. Hon. Kevin K. Ryan set bail in the amount of \$5,000.00 cash or \$10,000.00 bond. Goddard's case is rescheduled

for pre trial conference on February 24, 2011. If convicted, the defendant could be sentenced to up to $5\frac{1}{2}$ years in state prison. The defendant is represented by Allan Cruickshank, Esq.

17. Andrew J. Gonyo

Age 30

15 Harlan Drive, Plattsburgh, N.Y.



Andrew J. Gonyo was arraigned Tuesday upon an indictment charging Criminal Sale of a Controlled Substance Fourth Degree, a class C felony, and Criminal Possession of a Controlled Substance Fifth Degree, a class D felony. The defendant is alleged to have sold Methadone on March 11, 2010 in the Town of Mooers. Hon. Patrick R. McGill set bail in the amount of \$5,000.00 cash or \$10,000.00 bond. Gonyo's case is rescheduled for pre trial conference on February 23, 2011. If convicted, the defendant could be sentenced to up to 5

½ years in state prison. The defendant is represented by Heather Maure, Esq.

18. Florence R. Lasalle

Age 44

141 Emmons Street, Dannemora, N.Y.



Florence R. Lasalle was arraigned upon an indictment charging Criminal Sale of a Controlled Substance Third Degree and Criminal Possession of a Controlled Substance Third Degree, both class B felonies. The defendant is alleged to have sold Oxycodone on August 27, 2010, in the City of Plattsburgh. Hon. Kevin Ryan set bail in the amount of \$2,500.00 cash or \$5,000.00 bond. Lasalle's case is rescheduled for

pre trial conference on February 22, 2011. If convicted, the defendant could be sentenced up to 9 years in state prison. The defendant is represented by John Carter, Esq.

19. Steven J. Manion

Age 23

238 Spellman Road, Apt. 1, Beekmantown, N.Y.



Steven J. Manion was arraigned upon an indictment charging Criminal Sale of a Controlled Substance Fourth Degree, a class C felony, and Criminal Possession of a Controlled Substance Fifth Degree, a class D felony. The defendant is alleged to have sold Buprenorphine on July 23, 2010 in the City of Plattsburgh. Hon. Kevin K. Ryan

released Manion on Pre Trial Release. Manion's case is rescheduled for pre trial conference on February 24, 2011. If convicted, the defendant could be sentenced to up to 5 ½ years in state prison. Manion is represented by Allan Cruickshank, Esq.

20. Samuel M. Moura

Age 32

3 Cubb Circle, Plattsburgh, N.Y.



Samuel M. Moura was arraigned upon an indictment charging two counts of Criminal Sale of a Controlled Substance Third Degree and two counts of Criminal Possession of a Controlled Substance Third Degree, all class B felonies. The defendant is alleged to have sold cocaine on June 2, 2010 and June 18, 2010 in the Town of Plattsburgh. Hon. Kevin Ryan set bail in the amount of \$10,000.00 cash or \$20,000.00 bond. Moura's case is rescheduled for pre trial conference on February 24, 2011. If convicted, the defendant

could be sentenced up to 18 years in state prison. The defendant is represented by Diane Webster Brady, Esq.

21. Dung T. Nguyen

Age 41

474 Margaret St, Apt 74, Plattsburgh, N.Y.



Dung T. Nguyen was arraigned upon an indictment charging two counts of Criminal Sale of a Controlled Substance Third Degree and two counts of Criminal Possession of a Controlled Substance Third Degree, all class B felonies. The defendant is alleged to have sold cocaine on June 28, 2010 and June 29, 2010 in the City of Plattsburgh. Hon. Kevin Ryan set bail in the amount of \$10,000.00 cash or \$20,000.00 bond. Nguyen's case is

rescheduled for pre trial conference on February 22, 2011. If convicted, the defendant could be sentenced up to 18 years in state prison. The defendant is represented by Erin Mindoro, Esq.

22. Michael J. Obert

Age 52

137 Town Line Road, West Chazy, N.Y.



Michael J. Obert was arraigned upon an indictment charging three counts of Criminal Sale of a Controlled Substance Third Degree and three counts of Criminal Possession of a Controlled Substance Third Degree, all class B felonies. The defendant is alleged to have sold Oxymorphone and Oxycodone on two separate occasions on July 16, 2010, and cocaine on July 29, 2010, with the sales occurring in the Town of Beekmantown. Hon. Kevin K. Ryan set bail in the amount of \$20,000.00 cash or bond. Obert's case is rescheduled for pre trial conference on February 24, 2011. If convicted, the defendant

could be sentenced up to 27 years in state prison. The defendant appeared with Kristofer Michaud, Esq. for arraignment purposes.

23. Samantha L. Roark

Age 19

825 Hemingford Rd, Mooers, N.Y.



Samantha L. Roark was arraigned upon an indictment charging two counts of Criminal Sale of a Controlled Substance Third Degree and two counts of Criminal Possession of a Controlled Substance Third Degree, all class B felonies. The

defendant is alleged to have sold Oxycodone on May 19, 2010 in the Town of Champlain and Fentanyl on May 27, 2010 in the Town of Mooers. Hon. Patrick R. McGill set bail in the amount of \$15,000.00 cash or \$30,000.00 bond. Roark's case is rescheduled for pre trial conference on February 22, 2011. If convicted, the defendant could be sentenced up to 18 years in state prison. The defendant is represented by Kristofer Michaud, Esq.

24. Travis G. Skelton

Age 25

8921 Route 22, West Chazy, N.Y.



Travis G. Skelton was arraigned upon an indictment charging two counts of Criminal Sale of a Controlled Substance Fourth Degree, a class C felony, three counts of Criminal Possession of a Controlled Substance Fifth Degree, a class D felony and one count of Criminal Sale of a Controlled Substance Fifth Degree, a class D felony. The defendant is alleged to have sold Dihydrocodeinone with Acetaminophen on September 4, 2009 and Dihydrocodeinone with Acetaminophen and LSD on January 27, 2010, all in the Town of Altona. Hon. Patrick R. McGill set bail in the amount of \$5,000.00 cash

or \$10,000.00 bond. Skelton's case is rescheduled for pre trial conference on February 24, 2011. If convicted, the defendant could be sentenced up to 11 years in state prison. The defendant is represented by Erin Mindoro, Esq.

25. Ricky A. Sylvester

Age 45

1875 N. AuSable Street, Keeseville N.Y.



Ricky A. Sylvester was arraigned upon two separate indictments. On the first indictment the defendant is charged with Criminal Sale of a Controlled Substance Third Degree and Criminal Possession of a Controlled Substance Third Degree, both class B felonies. The defendant is alleged to have sold oxycodone on March 24, 2010 in the City of Plattsburgh. On the second indictment the defendant is charged with two counts of Criminal Sale of a Controlled Substance Third Degree and two counts of Criminal Possession of a Controlled Substance Third Degree. The defendant is alleged to have sold oxycodone on May 18, 2010 and cocaine on August 6, 2010 in the Town of

Plattsburgh. Hon. Patrick R. McGill set bail in the amount of \$10,000.00 cash or \$20,000.00 bond. Sylvester's case is rescheduled for pre trial conference on February 24, 2011. If convicted, the defendant could be sentenced up to 36 years in state prison. The defendant is represented by Marcia Moss, Esq.

26. Travis J. Therrian Age 29 4 Eleanor Way, Plattsburgh, N.Y.



Travis J. Therrian was arraigned upon an indictment charging Criminal Sale of a Controlled Substance Third Degree and Criminal Possession of a Controlled Substance Third Degree, both class B felonies. The defendant is alleged to have sold cocaine on May 6, 2010, in the City of Plattsburgh. Hon. Kevin K. Ryan set bail in the amount of \$10,000.00 cash or \$20,000.00 bond. Therrian's case is rescheduled for pre trial

conference on February 24, 2011. If convicted, the defendant could be sentenced up to 9 years in state prison. The defendant is represented by Heather Maure, Esq.



Sarah J. Tower was arraigned upon an indictment charging two counts of Criminal Sale of a Controlled Substance Third Degree and two counts of Criminal Possession of a Controlled Substance Third Degree, all class B felonies. The defendant is alleged to have sold morphine on May 11, 2010 and oxycodone on August 6, 2010 with each sale taking place in the City of Plattsburgh. Hon. Patrick R. McGill set bail in the amount of

\$5,000.00 cash or \$10,000.00 bond. Tower's case is rescheduled for pre trial conference on February 22, 2011. If convicted, the defendant could be sentenced up to 18 years in state prison. The defendant is represented by Keith Bruno, Esq.

28. Joseph M. Turgeon Age 33 25 Spruce Street, Champlain, N.Y.



Joseph M. Turgeon was arraigned upon an indictment charging two counts of Criminal Sale of a Controlled Substance Third Degree and two counts of Criminal Possession of a Controlled Substance Third Degree, all class B felonies. The defendant is alleged to have sold cocaine on two separate occasions on May 6, 2009, with each sale taking place in the City of Plattsburgh. Hon. Kevin K. Ryan set bail in the amount of \$20,000.00 cash or

\$40,000.00 bond. Turgeon's case is rescheduled for pre trial conference on February 22, 2011. If convicted, the defendant could be sentenced up to 18 years in state prison. The defendant is represented by Michael Phillips, Esq.

29. Ryan L. Unick Age 21 37 Silo Lane, Warwick, N.Y.



Ryan L. Unick was arraigned Tuesday upon an indictment charging Criminal Sale of a Controlled Substance Third Degree and Criminal Possession of a Controlled Substance Third Degree, both class B felonies, and Criminal Sale of a Controlled Substance in the Fifth Degree and Criminal Possession of a Controlled Substance in the Fifth Degree, both class D felonies. The defendant is alleged to have sold cocaine on May 7, 2010 and N-Benzylpiperazine on March 12, 2009 with each sale taking place in the City of Plattsburgh.

Hon. Patrick R. McGill set bail in the amount of \$10,000.00 cash or \$20,000.00 bond. Unick's case is rescheduled for pre trial conference on February 24, 2011. If convicted, the defendant could be sentenced to up to $11 \frac{1}{2}$ years in state prison. The defendant is represented by Erin Mindoro, Esq.

30. Christopher R. Winterbottom Age 42 23 Academy Street, West Chazy, N.Y.



Christopher R. Winterbottom was arraigned upon an indictment charging Criminal Sale of a Controlled Substance Third Degree and Criminal Possession of a Controlled Substance Third Degree, both class B felonies. The defendant is alleged to have sold cocaine on July 16, 2010, in the Town of Chazy. Hon. Kevin K. Ryan set bail in the amount of \$10,000.00 cash or \$10,000.00 bond. Winterbottom's case is rescheduled for pre trial conference on February 24, 2011. If convicted, the defendant could be sentenced up to 9 years in state prison. The defendant appeared with Tina Soloski, Esq., today for

31. Lauren M. Zsido

Age 21

70A Oak Street, Plattsburgh, N.Y.



Lauren M. Zsido was arraigned upon an indictment charging two counts of Criminal Sale of a Controlled Substance Third Degree and two counts of Criminal Possession of a Controlled Substance Third Degree, all class B felonies. The defendant is alleged to have sold oxycodone on August 26, 2010 and August 27, 2010, in the City of Plattsburgh. Hon. Kevin K. Ryan set bail in the amount of \$5,000.00 cash or \$10,000.00 bond. Zsido's case is rescheduled for pre trial conference on February 24, 2011. If convicted, the defendant

could be sentenced up to 18 years in state prison. The defendant is represented by Diane Webster Brady, Esq.

All cases were the result of investigations conducted by the Adirondack Drug Task Force which consists of the Plattsburgh City Police Department, Drug Enforcement Administration, U.S. Border Patrol, New York State Police, Clinton County Sheriff's Department, New York State Police Troop B Narcotics Task Force and the Clinton County District Attorney's Office.

THERE IS ONE INDICTMENT WHICH REMAINS SEALED UNTIL THE NAMED DEFENDANT IS ARRESTED.

Present at today's press conference representing each respective agency were Andrew J. Wylie, Clinton County District Attorney; James R. Burns, Assistant Agent in Charge for the Drug Enforcement Administration representing the Albany District Office; Kristy Sprague, Essex County District Attorney; Chief Desmond Racicot, Plattsburgh City Police Department; Sheriff David Favro, Clinton County Sheriff's Department; Captain Brent Gillam, New York State Police Troop B; Lieutenant Charles A. Potthast, New York State Police Troop B – B.C.I. Raybrook; Supervisory Agent Richard Hood, U.S. Border Patrol.

ALL OF THE CLINTON COUNTY INDCITMENTS ARE BEING PROSECUTED BY ASSISTANT DISTRICT ATTORNEY DOUGLAS COLLYER AND CHIEF ASSISTANT DISTRICT ATTORNEY TIM BLATCHLEY.

AS IN ALL CRIMINAL PROSECUTIONS IN NEW YORK STATE, EACH DEFENDANT NAMED HEREIN IS INNOCENT UNTIL PROVEN GUILTY BEYOND A REASONABLE DOUBT.