

STATE OF NEW YORK
COUNTY COURT COUNTY OF SARATOGA

THE PEOPLE OF THE STATE OF NEW YORK

-against-

AUGUST 2023 TERM
Indictment No. H-231-2023V

CRAIG N. ROSS, JR.,

Defendant.

COUNT ONE

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, accuse the defendant, Craig N. Ross, Jr. of the crime of KIDNAPPING IN THE FIRST DEGREE, a "Class A-I" Felony, in violation of Section 135.25(1) of the Penal Law of the State of New York, committed as follows:

The defendant, in the Town of Milton, County of Saratoga, State of New York, on or about September 30, 2023 through October 2, 2023, abducted another person and his intent was to compel a third person to pay or deliver money or property as ransom, or to engage in other particular conduct, or to refrain from engaging in particular conduct.

COUNT TWO

AND THE GRAND JURY AFORESAID, by this Indictment, accuse the defendant, Craig N. Ross, Jr., of the crime of PREDATORY SEXUAL ASSAULT AGAINST A CHILD, a "Class A-II" Felony, in violation of Section 130.96 of the Penal Law of the State of New York, committed as follows:

The defendant, in the Town of Milton, County of Saratoga, State of New York, on or about September 30, 2023 through October 2, 2023, being eighteen years old or more, committed the crime of Rape in the First Degree as defined in Section 130.35(4) of the Penal Law of the State of New York, and the victim was less than thirteen years old, to wit: the defendant engaged in sexual intercourse with another person who was less than thirteen years old and the actor is eighteen years old or more.

COUNT THREE

AND THE GRAND JURY AFORESAID, by this Indictment, accuse the defendant, Craig N. Ross, Jr., of the crime of PREDATORY SEXUAL ASSAULT AGAINST A CHILD, a "Class A-II" Felony, in violation of Section 130.96 of the Penal Law of the State of New York, committed as follows:

The defendant, in the Town of Milton, County of Saratoga, State of New York, on or about September 30, 2023 through October 2, 2023, being eighteen years old or more, committed the crime of Criminal Sexual Act in the First Degree, as defined in Section 130.50(4) of the Penal Law of the State of New York, and the victim was less than thirteen years old, to wit: the defendant engaged in oral sexual conduct with another person who was less than thirteen years old and the actor is eighteen years old or more.

COUNT FOUR

AND THE GRAND JURY AFORESAID, by this Indictment, accuse the defendant, Craig N. Ross, Jr., of the crime of PREDATORY SEXUAL ASSAULT AGAINST A CHILD, a "Class A-II" Felony, in violation of Section 130.96 of the Penal Law of the State of New York, committed as follows:

The defendant, in the Town of Milton, County of Saratoga, State of New York, on or about September 30, 2023 through October 2, 2023, being eighteen years old or more, committed the crime of Rape in the First Degree as defined in Section 130.35(4) of the Penal Law of the State of New York, and the victim was less than thirteen years old, to wit: the defendant engaged in sexual intercourse with another person who was less than thirteen years old and the actor is eighteen years old or more.

The defendant, in the Town of Milton, County of Saratoga, State of New York, on or about September 30, 2023 through October 2, 2023, subjected another person to sexual contact when the other person was less than eleven years old.

COUNT EIGHT

AND THE GRAND JURY AFORESAID, by this Indictment, accuse the defendant, Craig N. Ross, Jr., of the crime of ASSAULT IN THE SECOND DEGREE, a "Class D" Violent Felony, in violation of Section 120.05(6) of the Penal Law of the State of New York, committed as follows:

The defendant, in the Town of Milton, County of Saratoga, State of New York, on or about September 30, 2023 through October 2, 2023, in the course of and in furtherance of the commission or attempted commission of a felony, or of immediate flight therefrom, caused physical injury to a person other than one of the participants.

COUNT NINE

AND THE GRAND JURY AFORESAID, by this Indictment, accuse the defendant, Craig N. Ross, Jr., of the crime of ENDANGERING THE WELFARE OF A CHILD, a "Class A" Misdemeanor, in violation of Section 260.10(1) of the Penal Law of the State of New York, committed as follows:

The defendant, in the Town of Moreau, County of Saratoga, State of New York, on or about September 30, 2023, knowingly acted in a manner likely to be injurious to the physical, mental, or moral welfare of a child less than seventeen years old.

The defendant, in the Town of Milton, County of Saratoga, State of New York, on or about September 30, 2023 through October 2, 2023, subjected another person to sexual contact when the other person was less than eleven years old.

COUNT EIGHT

AND THE GRAND JURY AFORESAID, by this Indictment, accuse the defendant, Craig N. Ross, Jr., of the crime of ASSAULT IN THE SECOND DEGREE, a "Class D" Violent Felony, in violation of Section 120.05(6) of the Penal Law of the State of New York, committed as follows:

The defendant, in the Town of Milton, County of Saratoga, State of New York, on or about September 30, 2023 through October 2, 2023, in the course of and in furtherance of the commission or attempted commission of a felony, or of immediate flight therefrom, caused physical injury to a person other than one of the participants.

COUNT NINE

AND THE GRAND JURY AFORESAID, by this Indictment, accuse the defendant, Craig N. Ross, Jr., of the crime of ENDANGERING THE WELFARE OF A CHILD, a "Class A" Misdemeanor, in violation of Section 260.10(1) of the Penal Law of the State of New York, committed as follows:

The defendant, in the Town of Moreau, County of Saratoga, State of New York, on or about September 30, 2023, knowingly acted in a manner likely to be injurious to the physical, mental, or moral welfare of a child less than seventeen years old.