

SUPREME COURT OF THE STATE OF NEW YORK, APPELLATE DIVISION,
SECOND DEPARTMENT

People v. Ramsay

2026 N.Y. Slip Op. 02421 (App. Div. 2d Dep't Apr. 22 2026) · No. 2024-06152, 2024-06156 · Decided April 22, 2026

SUMMARY

The New York Appellate Division, Second Department, affirmed two judgments convicting Orlando Ramsay of multiple controlled-substance, weapons, firearm, drug-paraphernalia, conspiracy, and major-trafficker offenses following guilty pleas. The court held that his challenges to the voluntariness of his pleas were unpreserved and, alternatively, meritless, and that his ineffective-assistance claim was forfeited in part and otherwise without merit.

CASE DETAILS

COURT	Supreme Court of the State of New York, Appellate Division, Second Department
WRITING FOR THE COURT	Colleen D. Duffy, J.P.; Deborah A. Dowling, J.; Janice A. Taylor, J.; Laurence L. Love, J.
JURISDICTION	Supreme Court of the State of New York, Appellate Division, Second Department
DECIDED	April 22, 2026
DOCKET	2024-06152, 2024-06156
DISPOSITION	affirmed
PROCEDURAL POSTURE	Defendant appealed from two judgments of the County Court, Nassau County, rendered after his pleas of guilty and sentencing.
STANDARD OF REVIEW	Unpreserved claims regarding the validity of guilty pleas are generally not reviewable absent a recognized exception; the court reviewed the ineffective-assistance claim under the applicable New York guilty-plea forfeiture and merits standards.
PRECEDENTIAL VALUE	published
PARTIES	Orlando Ramsay v. The People of the State of New York

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QUESTIONS PRESENTED

1. Whether Ramsay's challenge to the knowing, voluntary, and intelligent nature of his guilty pleas was preserved for appellate review or fell within an exception to the preservation requirement.
2. Whether the record demonstrated that Ramsay's guilty pleas were knowing, voluntary, and intelligent.
3. Whether Ramsay's guilty plea forfeited his ineffective-assistance claim except to the extent it directly concerned plea negotiations or sentencing, and whether the remaining ineffective-assistance claim had merit.

HOLDINGS

1. A defendant's claim that a guilty plea was not knowing, voluntary, and intelligent is unpreserved when the defendant did not move to withdraw the plea or otherwise raise the issue in the trial court.
2. The record demonstrated that Ramsay's guilty pleas were knowing, voluntary, and intelligent.
3. By pleading guilty, Ramsay forfeited ineffective-assistance claims that did not directly involve the plea-negotiation process or sentencing; in any event, his ineffective-assistance claim was meritless.

FACTUAL BACKGROUND

Ramsay pleaded guilty under two indictments to numerous drug-trafficking, controlled-substance, weapons, firearm, drug-paraphernalia, and conspiracy offenses. The County Court imposed sentences on July 8, 2024. On appeal, he argued that his pleas were not knowing, voluntary, or intelligent and that he received ineffective assistance of counsel.

PROCEDURAL HISTORY

The County Court, Nassau County, entered two judgments on July 8, 2024, convicting Ramsay of numerous controlled-substance, weapons, firearm, drug-paraphernalia, major-trafficker, and conspiracy offenses under two indictments. Ramsay appealed, challenging the validity of his guilty pleas and asserting ineffective assistance of counsel. The Appellate Division affirmed both judgments.

DISPOSITION

affirmed

CASES CITED

- People v. Lopez, 71 N.Y.2d 662, 665
- People v. Escobargarcia, 237 A.D.3d 1221, 1222

- People v. Bermudez-Cedillos, 228 A.D.3d 681, 682
- People v. Sougou, 26 N.Y.3d 1052, 1055
- People v. Adams, 237 A.D.3d 966, 967
- People v. McKinnon, 186 A.D.3d 1533, 1533
- People v. Brown, 170 A.D.3d 878, 879

OPINION

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PER CURIAM.

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April 22, 2026

Appellate Division, Second Department

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This decision is uncorrected and subject to revision before publication in the Official Reports.

The People of the State of New York, respondent,

v

Orlando Ramsay, appellant. (Ind. Nos. 70522/21, 70916/21)

Supreme Court of the State of New York, Appellate Division, Second Judicial Department

Decided on April 22, 2026

2024-06152, 2024-06156

Colleen D. Duffy, J.P.

Deborah A. Dowling

Janice A. Taylor

Laurence L. Love, JJ.

Jillian S. Harrington, Staten Island, NY, for appellant.

Anne T. Donnelly, District Attorney, Mineola, NY (Sarah S. Rabinowitz and Kevin C. King of counsel), for respondent.

DECISION & ORDER

Appeals by the defendant from two judgments of the County Court, Nassau County (Teresa K. Corrigan, J.), both rendered July 8, 2024, convicting him of criminal possession of a controlled substance in the first degree and criminal possession of a controlled substance in the third degree under Indictment No. 70522/21, and operating as a major trafficker, criminal possession of a controlled substance in the first degree (two counts), criminal possession of a controlled substance in the second degree, criminal possession of a controlled substance in the third degree (six counts), criminal possession of a weapon in the second degree (three counts), criminal possession of a weapon in the third degree (three counts), criminal possession of a firearm (three counts), criminal use of drug paraphernalia in the second degree, and conspiracy in the second degree under Indictment No. 70916/21, upon his pleas of guilty, and imposing sentences.

ORDERED that the judgments are affirmed.

The defendant's

contention that his pleas of guilty were not knowing, voluntary, and intelligent is unpreserved for appellate review, since the defendant did not move to withdraw his pleas or otherwise raise the issue in the County Court (*see* *People v Lopez*, 71 NY2d 662, 665; *People v Escobargarcia*, 237 AD3d 1221, 1222). Moreover, the exception to the preservation requirement does not apply here because the defendant's allocution did not cast significant doubt on his guilt as to the crimes to which he pleaded, negate an essential element of any of the crimes, or call into question the voluntariness of his pleas (*see* *People v Bermudez-Cedillos*, 228 AD3d 681, 682). In any event, the record demonstrates that the defendant's pleas of guilty were knowing, voluntary, and intelligent (*see* *People v Sougou*, 26 NY3d 1052, 1055; *People v Escobargarcia*, 237 AD3d at 1222).

By pleading guilty, the defendant forfeited any claim of ineffective assistance of counsel that did not directly involve the plea negotiation process and sentence (*see* CPL 30.30; *People v Adams*, 237 AD3d 966, 967). In any event, the defendant's contention that he received ineffective assistance of counsel is without merit (*see* *People v McKinnon*, 186 AD3d 1533, 1533; *People v Brown*, 170 AD3d 878, 879).

DUFFY, J.P., DOWLING, TAYLOR and LOVE, JJ., concur.

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