

FELONY COMPLAINT

STATE OF NEW YORK)
COUNTY OF SUFFOLK)

DEFENDANTS IN CUSTODY
FROM DATE AND TIME

The People of the State of
New York
- vs -

Defendant (s)

JERNAIL SINGH

NAME (Complainant) **DISTRICT ATTORNEY INVESTIGATOR THOMAS McLAUGHLIN #310**

of SUFFOLK COUNTY DISTRICT ATTORNEY'S OFFICE Sqd. # 3251 / FIMLB
being duly sworn, says that between October 01, 2015 thru January 20, 2019

at 793 Suffolk Avenue of Brentwood
County of Suffolk, State of New York, the defendant(s) (Name, Address and D.O.B.)

JERNAIL SINGH DOB: 02/07/1956

5100 Northern Blvd. Glen Head, New York 11545
wrongfully, intentionally, knowingly, xxxxxxxxxxxxxxx committed the offense(s) of:

**COUNT ONE - - SCHEME TO DEFRAUD 1ST DEGREE IN VIOLATION OF SECTION 190.65 (1)(B) OF THE
NEW YORK STATE PENAL LAW CLASS E FELONY**

COUNT I

IN THAT: a person is guilty of a scheme to defraud in the first degree when he or she engages in a scheme constituting a systematic ongoing course of conduct with intent to defraud more than one person or to obtain property form more than one person by false or fraudulent pretenses, representations or promises, and so obtains property with a value in excess of one thousand dollars from one or more such persons:

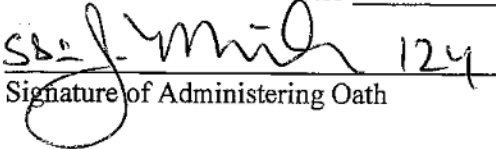
TO WIT: The above named defendant, on or about and between October 01, 2015 thru January 21, 2019 at 793 Suffolk Ave Brentwood Town of Islip County of Suffolk, State of New York did routinely underpay multiple employees, including Victims 1 and 2 and failed to pay overtime by making routine, unfulfilled promise of future payment and making threats if any employee complained to him or the Department of Labor there would be consequences and thereby obtained approximately \$200,000. in monies rightfully belonging to the employees as wages.

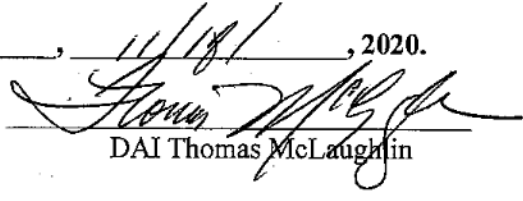
This complaint is based on (xxxxxxxxxxxxxxxxxxxx) & (information and belief), the source being the sworn deposition(s) of Victim #1 1/14/2020 and Victim #2 12-18-2019

Warrant Requested

Criminal Summons Requested

SWORN TO BEFORE ME _____, 2020.

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Signature of Administering Oath


DAI Thomas McLaughlin