

INDICTMENT  
SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

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

M  
INDICTMENT 110/2017

- AGAINST -

NON-ALIGNED

X. MICHAEL RIGLIETTI and  
MSR ELECTRICAL CONSTRUCTION CORP.,

LABOR FRAUDS UNIT  
FRAUDS BUREAU  
INVESTIGATIONS DIVISION

DEFENDANTS.

-----X

COUNTS

GRAND LARCENY IN THE SECOND DEGREE, PL § 155.40(1) (3 COUNTS)

VIOLATION OF LABOR LAW § 220(3)(d)(i)(3) (1 COUNT)

SCHEME TO DEFRAUD IN THE FIRST DEGREE, PL § 190.65(1)(b) (2 COUNTS)

OFFERING A FALSE INSTRUMENT FOR FILING  
IN THE FIRST DEGREE, PL § 175.35 (44 COUNTS)

FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE,  
PL § 175.10 (44 COUNTS)

A TRUE BILL

  
\_\_\_\_\_  
FOREPERSON OF THE GRAND JURY

CRIMINAL TERM ARR/MOT  
SUPREME COURT KINGS  
2017 JAN 25 AM 11:04

At all times relevant to this Indictment, unless otherwise indicated:

### INTRODUCTION

Defendant Michael Riglietti owned and operated defendant MSR Electrical Construction Corp. ("MSR Electrical"), which was located at 31 Bay Street in Brooklyn and then 124 South Long Beach Road in Rockville Centre. Defendants Riglietti and MSR Electrical failed to pay prevailing wages to at least four individuals known to the Grand Jury who worked for the defendants as electricians on public works construction projects in Brooklyn and elsewhere, financed by the New York City School Construction Authority ("SCA"), the Metropolitan Transportation Authority ("MTA") and the New York State Office of General Services ("OGS"). By failing to pay workers the prevailing wage, Michael Riglietti and MSR Electrical Construction Corp. stole more than \$568,000 in contract payments, intended for the workers, from these agencies.

From at least December 2012 to December 2015, Riglietti and MSR Electrical were the winning bidders as general contractors to perform electrical work for 11 contracts with the SCA. In addition, during this time period, Riglietti and MSR Electrical were sub-contractors on two contracts with the SCA. The bid and contract documents signed by Riglietti on behalf of MSR Electrical stated that the defendants were obligated to pay prevailing wages to all workers. The contracts further stated that the SCA had the right to withhold funds from any payment to MSR Electrical, to pay "laborers, workers and mechanics employed on the Work," who have been paid wages at a rate less than the prevailing wage.

As a condition of payment for work on the projects, the contracts required defendants to submit weekly certified payroll reports to the SCA or the General Contractor or both, with each payment requisition, showing that defendants had paid the full prevailing wages to all workers

for the period of time covered by the requisition. In addition to the certified payroll reports, defendants submitted separate certifications with each requisition stating that they had paid all the prevailing wages owed to workers on the project up to the date on each certification.

From at least December 2012 to the end of 2015, the defendants listed four electrical workers as electricians on Certified Payroll Reports submitted to the SCA on the 13 contracts. The defendants listed the names of these workers and stated that defendants had paid the workers the correct prevailing wages. The relevant prevailing wages, including supplemental benefits, for electricians on these projects ranged from \$95.45 to \$104.05 per hour. These statements made by the defendants were false because the defendants paid these four workers less than the prevailing wages: Electrician 1 was paid \$13.50 per hour; Electrician 2 was paid \$23 per hour; Electrician 3 was paid between \$22 and \$25 per hour, and Electrician 4 was paid various rates less than the prevailing wages. In addition, none of these workers received benefits required by law.

Relying on the false certifications defendants submitted with requisitions, the SCA paid defendants more than \$349,974.72 that should have been paid to the workers.

In addition to the contracts with the SCA, the defendants were a subcontractor on a contract with the MTA to perform electrical work at five locations in Manhattan and Queens. From in or about August 2013 to on or about May 11, 2014, Electrician 1 worked for the defendants according to the MTA contract. During this time period, the defendants stated on certified payroll reports that they paid Electrician 1 the prevailing wage; however, they paid Electrician 1 \$13.50 per hour, more than \$80 less than the prevailing wage. Relying on the false certifications that the defendants submitted, the MTA paid the General Contractor at least \$57,633 that should have been paid to Electrician 1.

Also, the defendants were the general contractor for a contract with OGS to perform electrical work at Creedmoor Psychiatric Center. From in or about July 2012 to in or about October 2014, Electricians 1 and 3 worked for the defendants at Creedmoor Psychiatric Hospital. During this time period, the defendants stated on certified payroll reports that they paid Electricians 1 and 3 the prevailing wage; however, the defendants paid Electrician 1 \$13.50 per hour, which is more than \$80 per hour less than the prevailing wage, and paid Electrician 3 between \$22 and \$25 per hour, more than \$65 per hour less than the prevailing wage. Relying on the false certifications that the defendants submitted, OGS paid MSR Electrical at least \$160,749.36 that should have been paid to Electricians 1 and 3.

In total, the defendants failed to pay four electrical workers the prevailing wage and stole more than \$568,000 from three government agencies.

#### **COUNT ONE**

THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of GRAND LARCENY IN THE SECOND DEGREE, in violation of Penal Law § 155.40(1), committed as follows:

The defendants, acting in concert, in the County of Kings and elsewhere, from in or about December 2012 to in or about December 2015, as part of a continuing course of conduct, stole property from the New York City School Construction Authority, the value of which exceeded fifty thousand dollars.

#### **COUNT TWO**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of GRAND LARCENY IN THE SECOND DEGREE, in violation of Penal Law § 155.40(1), committed as follows:

The defendants, acting in concert, in the County of Kings and elsewhere, from in or about August 2013 to on or about May 11, 2014, as part of a continuing course of conduct, stole property from the Metropolitan Transportation Authority, the value of which exceeded fifty thousand dollars.

**COUNT THREE**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of GRAND LARCENY IN THE SECOND DEGREE, in violation of Penal Law § 155.40(1), committed as follows:

The defendants, acting in concert, in the County of Kings and elsewhere, from in or about July 2012 to in or about October 2014, as part of a continuing course of conduct, stole property from the New York State Office of General Services, the value of which exceeded fifty thousand dollars.

**COUNT FOUR**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of a VIOLATION OF LABOR LAW § 220(3)(d)(i)(3), committed as follows:

The defendants, in the County of Kings and elsewhere, from in or about July 2012 to in or about December 2015, having participated in a public works project in the capacity of a contractor and subcontractor, willfully failed to pay and provide the prevailing wage and supplemental benefits to their employees, and such failure resulted in underpayments which exceeded one hundred thousand dollars, in aggregate.

**COUNT FIVE**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of SCHEME TO DEFRAUD IN THE FIRST DEGREE, in violation of Penal Law § 190.65(1)(b), committed as follows:

The defendants, in the County of Kings and elsewhere, from in or about July 2012 to in or about December 2015, engaged in a scheme constituting a systematic ongoing course of conduct with intent to defraud more than one person and to obtain property from more than one person by false and fraudulent pretenses, representations and promises, and so obtained property with a value in excess of one thousand dollars from one or more such persons.

**COUNT SIX**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of SCHEME TO DEFRAUD IN THE FIRST DEGREE, in violation of Penal Law § 190.65(1)(b), committed as follows:

The defendants, in the County of Kings and elsewhere, from in or about July 2012 to in or about December 2015, engaged in a scheme constituting a systematic ongoing course of conduct with intent to defraud more than one person and to obtain property from more than one

person by false and fraudulent pretenses, representations and promises, and so obtained property with a value in excess of one thousand dollars from one or more such persons.

**COUNT SEVEN**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about January 20, 2015, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending March 23, 2014, to the New York City School Construction Authority, under contract number 11166.

**COUNT EIGHT**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about January 20, 2015, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and

omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending March 23, 2014, to the New York City School Construction Authority, under contract number 11166.

**COUNT NINE**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about March 5, 2013, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending December 2, 2012, to the New York City School Construction Authority, under contract number 12549.

**COUNT TEN**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about March 5, 2013, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending December 2, 2012, to the New York City School Construction Authority, under contract number 12549.

**COUNT ELEVEN**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about March 5, 2013, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending February 10, 2013, to the New York City School Construction Authority, under contract number 12549.

**COUNT TWELVE**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL

CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about March 5, 2013, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending February 10, 2013, to the New York City School Construction Authority, under contract number 12549.

**COUNT THIRTEEN**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about July 10, 2013, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending June 2, 2013, to the New York City School Construction Authority, under contract number 12549.

**COUNT FOURTEEN**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about July 10, 2013, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending June 2, 2013, to the New York City School Construction Authority, under contract number 12549.

**COUNT FIFTEEN**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about August 1, 2013, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be

submitted a false certified payroll report for the week ending July 14, 2013, to the New York City School Construction Authority, under contract number 12549.

**COUNT SIXTEEN**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about August 1, 2013, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending July 14, 2013, to the New York City School Construction Authority, under contract number 12549.

**COUNT SEVENTEEN**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about February 28, 2014, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered

and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending January 12, 2014, to the New York City School Construction Authority, under contract number 12549.

**COUNT EIGHTEEN**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about February 28, 2014, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending January 12, 2014, to the New York City School Construction Authority, under contract number 12549.

**COUNT NINETEEN**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about August 5, 2013, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with

intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending July 28, 2013, to the New York City School Construction Authority, under contract number 12918.

**COUNT TWENTY**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about August 5, 2013, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending July 28, 2013, to the New York City School Construction Authority, under contract number 12918.

**COUNT TWENTY-ONE**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about August 30, 2013, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending August 25, 2013, to the New York City School Construction Authority, under contract number 12918.

**COUNT TWENTY-TWO**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about August 30, 2013, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending August 25, 2013, to the New York City School Construction Authority, under contract number 12918.

**COUNT TWENTY-THREE**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL

CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about August 23, 2013, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending July 28, 2013, to the New York City School Construction Authority, under contract number 12923.

**COUNT TWENTY-FOUR**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about August 23, 2013, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending July 28, 2013, to the New York City School Construction Authority, under contract number 12923.

**COUNT TWENTY-FIVE**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about August 27, 2013, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending August 4, 2013, to the New York City School Construction Authority, under contract number 12923.

**COUNT TWENTY-SIX**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about August 27, 2013, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely,

a false certified payroll report for the week ending August 4, 2013, to the New York City School Construction Authority, under contract number 12923.

**COUNT TWENTY-SEVEN**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about April 23, 2014, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending April 6, 2014, to the New York City School Construction Authority, under contract number 13225.

**COUNT TWENTY-EIGHT**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about April 23, 2014, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and

omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending April 6, 2014, to the New York City School Construction Authority, under contract number 13225.

**COUNT TWENTY-NINE**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about June 24, 2014, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending June 15, 2014, to the New York City School Construction Authority, under contract number 13225.

**COUNT THIRTY**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about June 24, 2014, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending June 15, 2014, to the New York City School Construction Authority, under contract number 13225.

**COUNT THIRTY-ONE**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about October 30, 2014, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending September 28, 2014, to the New York City School Construction Authority, under contract number 13250.

**COUNT THIRTY-TWO**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL

CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about October 30, 2014, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending September 28, 2014, to the New York City School Construction Authority, under contract number 13250.

**COUNT THIRTY-THREE**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about November 9, 2015, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending August 9, 2015, to the New York City School Construction Authority, under contract number 13250.

**COUNT THIRTY-FOUR**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about November 9, 2015, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending August 9, 2015, to the New York City School Construction Authority, under contract number 13250.

**COUNT THIRTY-FIVE**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about November 9, 2015, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be

submitted a false certified payroll report for the week ending August 23, 2015, to the New York City School Construction Authority, under contract number 13250.

**COUNT THIRTY-SIX**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about November 9, 2015, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending August 23, 2015, to the New York City School Construction Authority, under contract number 13250.

**COUNT THIRTY-SEVEN**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about November 12, 2015, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered

and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending September 6, 2015, to the New York City School Construction Authority, under contract number 13250.

**COUNT THIRTY-EIGHT**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about November 12, 2015, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending September 6, 2015, to the New York City School Construction Authority, under contract number 13250.

**COUNT THIRTY-NINE**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about November 12, 2015, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with

intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending September 13, 2015, to the New York City School Construction Authority, under contract number 13250.

**COUNT FORTY**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about November 12, 2015, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending September 13, 2015, to the New York City School Construction Authority, under contract number 13250.

**COUNT FORTY-ONE**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about November 23, 2015, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending October 4, 2015, to the New York City School Construction Authority, under contract number 13250.

**COUNT FORTY-TWO**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about November 23, 2015, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending October 4, 2015, to the New York City School Construction Authority, under contract number 13250.

**COUNT FORTY-THREE**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL

CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about June 3, 2014, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending May 4, 2014, to the New York City School Construction Authority, under contract number 13252.

**COUNT FORTY-FOUR**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about June 3, 2014, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending May 4, 2014, to the New York City School Construction Authority, under contract number 13252.

**COUNT FORTY-FIVE**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about June 3, 2014, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending May 11, 2014, to the New York City School Construction Authority, under contract number 13252.

**COUNT FORTY-SIX**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about June 3, 2014, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely,

a false certified payroll report for the week ending May 11, 2014, to the New York City School Construction Authority, under contract number 13252.

**COUNT FORTY-SEVEN**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about October 30, 2014, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending June 8, 2014, to the New York City School Construction Authority, under contract number 13252.

**COUNT FORTY-EIGHT**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about October 30, 2014, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and

omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending June 8, 2014, to the New York City School Construction Authority, under contract number 13252.

**COUNT FORTY-NINE**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about February 23, 2015, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending January 18, 2015, to the New York City School Construction Authority, under contract number 13252.

**COUNT FIFTY**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about February 23, 2015, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending January 18, 2015, to the New York City School Construction Authority, under contract number 13252.

**COUNT FIFTY-ONE**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about October 23, 2014, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending August 3, 2014, to the New York City School Construction Authority, under contract number 13424.

**COUNT FIFTY-TWO**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL

CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about October 23, 2014, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending August 3, 2014, to the New York City School Construction Authority, under contract number 13424.

**COUNT FIFTY-THREE**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about November 10, 2014, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending September 7, 2014, to the New York City School Construction Authority, under contract number 13424.

**COUNT FIFTY-FOUR**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about November 10, 2014, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending September 7, 2014, to the New York City School Construction Authority, under contract number 13424.

**COUNT FIFTY-FIVE**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about November 10, 2014, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be

submitted a false certified payroll report for the week ending November 2, 2014, to the New York City School Construction Authority, under contract number 13424.

**COUNT FIFTY-SIX**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about November 10, 2014, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending November 2, 2014, to the New York City School Construction Authority, under contract number 13424.

**COUNT FIFTY-SEVEN**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about September 1, 2014, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered

and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending August 17, 2014, to the New York City School Construction Authority, under contract number 13518.

**COUNT FIFTY-EIGHT**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about September 1, 2014, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending August 17, 2014, to the New York City School Construction Authority, under contract number 13518.

**COUNT FIFTY-NINE**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about September 3, 2014, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with

intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending August 24, 2014, to the New York City School Construction Authority, under contract number 13518.

**COUNT SIXTY**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about September 3, 2014, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending August 24, 2014, to the New York City School Construction Authority, under contract number 13518.

**COUNT SIXTY-ONE**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about October 6, 2014, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending September 14, 2014, to the New York City School Construction Authority, under contract number 13518.

**COUNT SIXTY-TWO**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about October 6, 2014, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending September 14, 2014, to the New York City School Construction Authority, under contract number 13518.

**COUNT SIXTY-THREE**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL

CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about December 8, 2014, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending November 9, 2014, to the New York City School Construction Authority, under contract number 13625.

**COUNT SIXTY-FOUR**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about December 8, 2014, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending November 9, 2014, to the New York City School Construction Authority, under contract number 13625.

**COUNT SIXTY-FIVE**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about January 9, 2015, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending December 21, 2014, to the New York City School Construction Authority, under contract number 13625.

**COUNT SIXTY-SIX**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about January 9, 2015, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely,

a false certified payroll report for the week ending December 21, 2014, to the New York City School Construction Authority, under contract number 13625.

**COUNT SIXTY-SEVEN**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about April 10, 2015, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending January 18, 2015, to the New York City School Construction Authority, under contract number 13630.

**COUNT SIXTY-EIGHT**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about April 10, 2015, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and

omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending January 18, 2015, to the New York City School Construction Authority, under contract number 13630.

**COUNT SIXTY-NINE**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about April 11, 2015, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending March 1, 2015, to the New York City School Construction Authority, under contract number 13630.

**COUNT SEVENTY**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about April 11, 2015, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending March 1, 2015, to the New York City School Construction Authority, under contract number 13630.

**COUNT SEVENTY-ONE**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about January 21, 2015, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending January 4, 2015, to the New York City School Construction Authority, under contract number 13669.

**COUNT SEVENTY-TWO**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL

CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about January 21, 2015, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending January 4, 2015, to the New York City School Construction Authority, under contract number 13669.

**COUNT SEVENTY-THREE**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about January 23, 2015, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending January 11, 2015, to the New York City School Construction Authority, under contract number 13669.

**COUNT SEVENTY-FOUR**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about January 23, 2015, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending January 11, 2015, to the New York City School Construction Authority, under contract number 13669.

**COUNT SEVENTY-FIVE**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about February 26, 2015, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be

submitted a false certified payroll report for the week ending February 22, 2015, to the New York City School Construction Authority, under contract number 13687.

**COUNT SEVENTY-SIX**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about February 26, 2015, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending February 22, 2015, to the New York City School Construction Authority, under contract number 13687.

**COUNT SEVENTY-SEVEN**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about March 18, 2015, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered

and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending March 1, 2015, to the New York City School Construction Authority, under contract number 13687.

**COUNT SEVENTY-EIGHT**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about March 18, 2015, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending March 1, 2015, to the New York City School Construction Authority, under contract number 13687.

**COUNT SEVENTY-NINE**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about September 24, 2013, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with

intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending August 25, 2013, to the Metropolitan Transportation Authority, under contract number C-34812.

**COUNT EIGHTY**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about September 24, 2013, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending August 25, 2013, to the Metropolitan Transportation Authority, under contract number C-34812.

**COUNT EIGHTY-ONE**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about December 2, 2013, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending December 1, 2013, to the Metropolitan Transportation Authority, under contract number C-34812.

**COUNT EIGHTY-TWO**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about December 2, 2013, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending December 1, 2013, to the Metropolitan Transportation Authority, under contract number C-34812.

**COUNT EIGHTY-THREE**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL

CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about March 3, 2014, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending March 2, 2014, to the Metropolitan Transportation Authority, under contract number C-34812.

**COUNT EIGHTY-FOUR**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about March 3, 2014, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending March 2, 2014, to the Metropolitan Transportation Authority, under contract number C-34812.

**COUNT EIGHTY-FIVE**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about May 13, 2014, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending May 11, 2014, to the Metropolitan Transportation Authority, under contract number C-34812.

**COUNT EIGHTY-SIX**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about May 13, 2014, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely,

omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending July 1, 2012, to the New York State Office of General Services, under contract number 44003-E.

**COUNT EIGHTY-NINE**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about September 2, 2012, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending September 2, 2012, to the New York State Office of General Services, under contract number 44003-E.

**COUNT NINETY**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about September 2, 2012, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending September 2, 2012, to the New York State Office of General Services, under contract number 44003-E.

**COUNT NINETY-ONE**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about January 6, 2013, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending January 6, 2013, to the New York State Office of General Services, under contract number 44003-E.

**COUNT NINETY-TWO**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL

CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about January 6, 2013, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending January 6, 2013, to the New York State Office of General Services, under contract number 44003-E.

**COUNT NINETY-THREE**

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about March 3, 2013, in the County of Kings and elsewhere, knowing that a written instrument contained a false statement and false information, and with intent to defraud, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, in that defendants submitted and caused to be submitted a false certified payroll report for the week ending March 3, 2013, to the New York State Office of General Services, under contract number 44003-E.

COUNT NINETY-FOUR

AND THE GRAND JURY OF THE COUNTY OF KINGS, BY THIS INDICTMENT, further accuses the defendants MICHAEL RIGLIETTI and MSR ELECTRICAL CONSTRUCTION CORP. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

The defendants, on or about March 3, 2013, in the County of Kings and elsewhere, with intent to defraud, including the intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise and omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which they knew to be imposed upon them by law and by the nature of their position, namely, a false certified payroll report for the week ending March 3, 2013, to the New York State Office of General Services, under contract number 44003-E.

ERIC GONZALEZ  
ACTING DISTRICT ATTORNEY



## SERVICE OF PRE-TRIAL MOTIONS BY DEFENDANT

TO DEFENDANT:

PLEASE TAKE NOTICE that pursuant to C.P.L. Article 225, defendant (s) must ordinarily make all pre-trial motions within forty-five days after arraignment and before commencement of trial. Upon expiration of the applicable period within which defendant must make pre-trial motions, the People will move the Court to preclude any pre-trial motions made thereafter.

Sincerely,

ERIC GONZALEZ  
Acting District Attorney  
Kings County

(TRIAL)

SUPREME COURT OF THE STATE  
OF NEW YORK—KINGS COUNTY

Tried-Part \_\_\_\_\_

Judge \_\_\_\_\_

A.D.A. \_\_\_\_\_

Verdict \_\_\_\_\_

**INDICTMENT**

**ERIC GONZALEZ**  
Acting District Attorney

Pleads Not Guilty \_\_\_\_\_

Judge \_\_\_\_\_

A.D.A. \_\_\_\_\_

Filed \_\_\_\_\_

Pleads Not Guilty \_\_\_\_\_

(PLEA)

Judge \_\_\_\_\_

A.D.A. \_\_\_\_\_

Filed \_\_\_\_\_

Pleads Not Guilty \_\_\_\_\_

A.D.A. \_\_\_\_\_

Pleads Guilty to \_\_\_\_\_

Judge \_\_\_\_\_

A.D.A. \_\_\_\_\_

Filed **JAN 25 2017**