

INDICTMENT

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

-----X
 THE PEOPLE OF THE STATE OF NEW YORK
 AGAINST
 VICKRAM MANGRU
 Defendant
 GAYATRI MANGRU
 Defendant
 RAVI MANGRU
 Defendant
 AVM CONSTRUCTION CORP.
 Defendant
 -----X

GJ# 43686-2017
 FILED:
 INDICTMENT NO. 2417-17

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- LL 220(3)(d)(i)(3) FAILURE TO PAY PREVAILING WAGES AND BENEFITS (1) (VICKRAM MANGRU)
- LL 220(3)(d)(i)(3) FAILURE TO PAY PREVAILING WAGES AND BENEFITS (1) (VICKRAM MANGRU, GAYATRI MANGRU, RAVI MANGRU & AVM CONSTRUCTION CORP.)
- PL 175.10 FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE (3) (VICKRAM MANGRU)
- PL 175.10 FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE (3) (GAYATRI MANGRU & AVM CONSTRUCTION CORP.)

October 19, 2017

OCT 27 2017

A TRUE BILL


 FOREPERSON OF THE GRAND JURY

NEW YORK ATTORNEY GENERAL

FIRST COUNT

THE GRAND JURY OF THE COUNTY OF BRONX, by this indictment, accuses the defendant, VICKRAM MANGRU, d/b/a Vick Construction, of the crime of FAILURE TO PAY PREVAILING WAGES AND BENEFITS, in violation of Labor Law §220(3)(d)(i)(3), committed as follows:

Defendant, VICKRAM MANGRU, d/b/a Vick Construction, in the County of Bronx, during a period from on or about December 22, 2012 to on or about April 12, 2014, having participated in a public works project in the capacity of a contractor or subcontractor, willfully failed to pay and provide the prevailing rate of wage and supplements to employees known to the Grand Jury who were employed by the defendant, and such failure resulted in underpayments, which in the aggregate amount to all workers employed by the defendant, resulted in an amount greater than \$100,000 dollars.

SECOND COUNT

THE GRAND JURY OF THE COUNTY OF BRONX, by this indictment, accuses the defendants, VICKRAM MANGRU, GAYATRI MANGRU, RAVI MANGRU, and AVM CONSTRUCTION CORP. of the crime of FAILURE TO PAY PREVAILING WAGES AND BENEFITS, in violation of Labor Law §220(3)(d)(i)(3), committed as follows:

Defendants, VICKRAM MANGRU, GAYATRI MANGRU, RAVI MANGRU, and AVM CONSTRUCTION CORP., acting in concert, in the County of Bronx, during a period from on or about April 13, 2014 to on or about February 14, 2015, having participated in a public works project in the capacity of a contractor or subcontractor, willfully failed to

pay and provide the prevailing rate of wage and supplements to employees known to the Grand Jury who were employed by the defendants, and such failure resulted in underpayments, which in the aggregate amount to all workers employed by the defendants, resulted in an amount greater than \$100,000 dollars.

THIRD COUNT

THE GRAND JURY OF THE COUNTY OF BRONX, by this indictment, accuses the defendant, VICKRAM MANGRU, d/b/a Vick Construction, of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law §175.10, committed as follows:

Defendant, VICKRAM MANGRU, in the County of Bronx, on or about March 14, 2013, with the intent to defraud including the intent to commit another crime and to aid and conceal the commission of another crime, made and caused to be made a false entry in the business records of an enterprise, omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which he knew to be imposed upon him by law and by the nature of his position, and prevented the making of a true entry and caused the omission thereof in the business record of an enterprise, to wit, a Certified Payroll Report and Certified Payroll Summary Report for Vick Construction for the week ending March 9, 2013 for work performed at P.S. 103 in Bronx, NY.

FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF BRONX, by this indictment, accuses the defendant, VICKRAM MANGRU, d/b/a Vick Construction, of

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

Defendant, VICKRAM MANGRU, d/b/a Vick Construction, in the County of Bronx, on or about April 9, 2013, with the intent to defraud including the intent to commit another crime and to aid and conceal the commission of another crime, made and caused to be made a false entry in the business records of an enterprise, omitted to make a true entry in the business records of an enterprise in violation of a duty to do so which he knew to be imposed upon him by law and by the nature of his position, and prevented the making of a true entry and caused the omission thereof in the business record of an enterprise, to wit, a Certified Payroll Report and a Certified Payroll Summary Report for Vick Construction for the week ending March 16, 2013 for work performed at I.S. 183 in Bronx, NY.

FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF BRONX, by this indictment, accuses the defendant, VICKRAM MANGRU, d/b/a Vick Construction, of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law §175.10, committed as follows:

Defendant, VICKRAM MANGRU, in the County of Bronx, on or about April 11, 2013, with the intent to defraud including the intent to commit another crime and to aid and conceal the commission of another crime, made and caused to be made a false entry in the business records of an enterprise, omitted to make a true entry in the business records of an enterprise in violation of a duty to do

so which he knew to be imposed upon him by law and by the nature of his position, and prevented the making of a true entry and caused the omission thereof in the business record of an enterprise, to wit, a Certified Payroll Report and a Certified Payroll Summary Report for Vick Construction for the week ending March 30, 2013 for work performed at I.S. 52 in Bronx, NY.

SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF BRONX, by this indictment, accuses the defendants, GAYATRI MANGRU and AVM CONSTRUCTION CORP., of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law §175.10, committed as follows:

Defendants, GAYATRI MANGRU and AVM CONSTRUCTION CORP., acting in concert, in the County of Bronx, on or about September 30, 2014, with the intent to defraud including the intent to commit another crime and to aid and conceal the commission of another crime, made and caused to be made a false entry in the business records of an enterprise, 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, and prevented the making of a true entry and caused the omission thereof in the business record of an enterprise, to wit, a Certified Payroll Report and a Certified Payroll Summary Report for AVM Construction Corp. for the week ending September 6, 2014 for work performed at I.S. 142 in Bronx, NY.

SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF BRONX, by this indictment, accuses the defendants, GAYATRI MANGRU and AVM CONSTRUCTION CORP., of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law §175.10, committed as follows:

Defendants, GAYATRI MANGRU and AVM CONSTRUCTION CORP., acting in concert, in the County of Bronx, on or about December 18, 2014, with the intent to defraud including the intent to commit another crime and to aid and conceal the commission of another crime, made and caused to be made a false entry in the business records of an enterprise, 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, and prevented the making of a true entry and caused the omission thereof in the business record of an enterprise, to wit, a Certified Payroll Report and a Certified Payroll Summary Report for AVM Construction Corp. for the week ending October 11, 2014 for work performed at P.S. 73 in Bronx, NY.


EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF BRONX, by this indictment, accuses the defendants, GAYATRI MANGRU and AVM CONSTRUCTION CORP., of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law §175.10, committed as follows:

Defendants, GAYATRI MANGRU and AVM CONSTRUCTION CORP., acting in concert, in the County of Bronx, on or about January 28, 2015,

with the intent to defraud including the intent to commit another crime and to aid and conceal the commission of another crime, made and caused to be made a false entry in the business records of an enterprise, 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, and prevented the making of a true entry and caused the omission thereof in the business record of an enterprise, to wit, a Certified Payroll Report and a Certified Payroll Summary Report for AVM Construction Corp. for the week ending January 10, 2015 for work performed at P.S. 35 in Bronx, NY.

ERIC T. SCHNEIDERMAN
NEW YORK STATE ATTORNEY GENERAL

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