

I N D I C T M E N T

S U P R E M E C O U R T O F T H E S T A T E O F N E W Y O R K
C O U N T Y O F Q U E E N S

THE PEOPLE OF THE STATE OF NEW YORK

AGAINST

JAGDEEP DEOL
DEFENDANT

LASER ELECTRICAL CONTRACTING INC.
DEFENDANT

FILED:
INDICTMENT NO. 1897/2019

PL 155.40-1	GRAND LARCENY IN THE SECOND DEGREE (1-2)	(DEOL, JAGDEEP) (LASER ELECTRICAL CONTRACTING INC.)
LAB 220-3-D-I-3	FAILURE TO PAY PREVAILING WAGES (3)	(DEOL, JAGDEEP) (LASER ELECTRICAL CONTRACTING INC.)
LAB 220-3-D-I-4	FAILURE TO PAY PREVAILING WAGES (4)	(DEOL, JAGDEEP) (LASER ELECTRICAL CONTRACTING INC.)
PL 190.65-1A	SCHEME TO DEFRAUD IN THE FIRST DEGREE (5)	(DEOL, JAGDEEP) (LASER ELECTRICAL CONTRACTING INC.)
PL 190.65-1B	SCHEME TO DEFRAUD IN THE FIRST DEGREE (6)	(DEOL, JAGDEEP) (LASER ELECTRICAL CONTRACTING INC.)

FIRST COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF GRAND LARCENY IN THE SECOND DEGREE COMMITTED
AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT AND BETWEEN
MARCH 22, 2014 AND JANUARY 14, 2018 IN THE COUNTY OF QUEENS AND
ELSEWHERE, STOLE PROPERTY HAVING AN AGGREGATE VALUE EXCEEDING FIFTY
THOUSAND DOLLARS, TO WIT: UNITED STATES CURRENCY FROM NEW YORK CITY
SCHOOL CONSTRUCTION AUTHORITY.

SECOND COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF GRAND LARCENY IN THE SECOND DEGREE COMMITTED
AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT AND BETWEEN
JANUARY 18, 2014 AND JANUARY 20, 2018 IN THE COUNTY OF QUEENS AND
ELSEWHERE, STOLE PROPERTY HAVING AN AGGREGATE VALUE EXCEEDING FIFTY
THOUSAND DOLLARS, TO WIT: UNITED STATES CURRENCY FROM DEPARTMENT OF
EDUCATION.

THIRD COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF FAILURE TO PAY PREVAILING WAGES COMMITTED AS
FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT AND BETWEEN
MARCH 22, 2014 AND JANUARY 20, 2018 IN THE COUNTY OF QUEENS AND
ELSEWHERE, PARTICIPATED IN A PUBLIC WORKS PROJECT IN THE CAPACITY OF A
CONTRACTOR OR SUBCONTRACTOR AND WILFULLY FAILED TO PAY OR PROVIDE THE
PREVAILING RATE OF WAGE OR SUPPLEMENTS AND SUCH FAILURE RESULTED IN
UNDERPAYMENTS, WHICH IN THE AGGREGATE AMOUNTS TO ALL WORKERS EMPLOYED BY
SUCH PERSON, RESULTED IN AN AMOUNT GREATER THAN ONE HUNDRED THOUSAND
DOLLARS.

FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF FAILURE TO PAY PREVAILING WAGES COMMITTED AS
FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT AND BETWEEN
MARCH 22, 2014 AND JANUARY 20, 2018 IN THE COUNTY OF QUEENS AND
ELSEWHERE, PARTICIPATED IN A PUBLIC WORKS PROJECT IN THE CAPACITY OF A
CONTRACTOR OR SUBCONTRACTOR AND WILFULLY FAILED TO PAY OR PROVIDE THE
PREVAILING RATE OF WAGE OR SUPPLEMENTS AND SUCH FAILURE RESULTED IN
UNDERPAYMENTS, WHICH IN THE AGGREGATE AMOUNTS TO ALL WORKERS EMPLOYED BY
SUCH PERSON, RESULTED IN AN AMOUNT GREATER THAN FIVE HUNDRED THOUSAND
DOLLARS.

FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF SCHEME TO DEFRAUD IN THE FIRST DEGREE
COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT AND BETWEEN
JANUARY 01, 2014 AND JANUARY 31, 2018 IN THE COUNTY OF QUEENS AND
ELSEWHERE, ENGAGED IN A SCHEME CONSTITUTING A SYSTEMATIC ONGOING
COURSE OF CONDUCT WITH INTENT TO DEFRAUD TEN OR MORE PERSONS OR TO
OBTAIN PROPERTY FROM TEN OR MORE PERSONS BY FALSE OR FRAUDULENT
PRETENSES, REPRESENTATIONS OR PROMISES, AND SO OBTAINED PROPERTY FROM
ONE OR MORE OF SUCH PERSONS.

SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF SCHEME TO DEFRAUD IN THE FIRST DEGREE
COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT AND BETWEEN
JANUARY 01, 2014 AND JANUARY 31, 2018 IN THE COUNTY OF QUEENS AND
ELSEWHERE, ENGAGED IN A SCHEME CONSTITUTING A SYSTEMATIC ONGOING
COURSE OF CONDUCT, WITH INTENT TO DEFRAUD MORE THAN ONE PERSON OR TO
OBTAIN PROPERTY FROM MORE THAN ONE PERSON BY FALSE OR FRAUDULENT
PRETENSES, REPRESENTATIONS OR PROMISES, AND SO OBTAINED PROPERTY WITH
A VALUE IN EXCESS OF ONE THOUSAND DOLLARS FROM ONE OR MORE PERSONS.

SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF OFFERING A FALSE INSTRUMENT FOR FILING IN
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT MAY 10, 2016
IN THE COUNTY OF QUEENS, KNOWING THAT A WRITTEN INSTRUMENT CONTAINED A
FALSE STATEMENT OR FALSE INFORMATION, AND WITH INTENT TO DEFRAUD THE
STATE OR ANY POLITICAL SUBDIVISION THEREOF, OFFERED OR PRESENTED THE
SAME TO A PUBLIC OFFICE OR PUBLIC SERVANT KNOWING OR BELIEVING THAT IT
WOULD BE FILED WITH, REGISTERED OR RECORDED IN, OR OTHERWISE BECOME A
PART OF THE RECORDS OF SUCH PUBLIC OFFICE OR PUBLIC SERVANT.

EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF FALSIFYING BUSINESS RECORDS IN THE FIRST
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT MAY 10, 2016
IN THE COUNTY OF QUEENS, WITH THE INTENT TO DEFRAUD, MADE OR CAUSED A
FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, AND THEIR INTENT
TO DEFRAUD INCLUDED AN INTENT TO COMMIT ANOTHER CRIME OR CONCEAL THE
COMMISSION THEREOF.

NINTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF OFFERING A FALSE INSTRUMENT FOR FILING IN
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT MAY 10, 2016
IN THE COUNTY OF QUEENS, KNOWING THAT A WRITTEN INSTRUMENT CONTAINED A
FALSE STATEMENT OR FALSE INFORMATION, AND WITH INTENT TO DEFRAUD THE
STATE OR ANY POLITICAL SUBDIVISION THEREOF, OFFERED OR PRESENTED THE
SAME TO A PUBLIC OFFICE OR PUBLIC SERVANT KNOWING OR BELIEVING THAT IT
WOULD BE FILED WITH, REGISTERED OR RECORDED IN, OR OTHERWISE BECOME A
PART OF THE RECORDS OF SUCH PUBLIC OFFICE OR PUBLIC SERVANT.

TENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF FALSIFYING BUSINESS RECORDS IN THE FIRST
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT MAY 10, 2016
IN THE COUNTY OF QUEENS, WITH THE INTENT TO DEFRAUD, MADE OR CAUSED A
FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, AND THEIR INTENT
TO DEFRAUD INCLUDED AN INTENT TO COMMIT ANOTHER CRIME OR CONCEAL THE
COMMISSION THEREOF.

ELEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF OFFERING A FALSE INSTRUMENT FOR FILING IN
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT FEBRUARY 11,
2016 IN THE COUNTY OF QUEENS, KNOWING THAT A WRITTEN INSTRUMENT
CONTAINED A FALSE STATEMENT OR FALSE INFORMATION, AND WITH INTENT TO
DEFRAUD THE STATE OR ANY POLITICAL SUBDIVISION THEREOF, OFFERED OR
PRESENTED THE SAME TO A PUBLIC OFFICE OR PUBLIC SERVANT KNOWING OR
BELIEVING THAT IT WOULD BE FILED WITH, REGISTERED OR RECORDED IN, OR
OTHERWISE BECOME A PART OF THE RECORDS OF SUCH PUBLIC OFFICE OR PUBLIC
SERVANT.

TWELFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF FALSIFYING BUSINESS RECORDS IN THE FIRST
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT FEBRUARY 11,
2016 IN THE COUNTY OF QUEENS, WITH THE INTENT TO DEFRAUD, MADE OR CAUSED
A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, AND THEIR INTENT
TO DEFRAUD INCLUDED AN INTENT TO COMMIT ANOTHER CRIME OR CONCEAL THE
COMMISSION THEREOF.

THIRTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF OFFERING A FALSE INSTRUMENT FOR FILING IN
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT MARCH 04, 2016
IN THE COUNTY OF QUEENS, KNOWING THAT A WRITTEN INSTRUMENT CONTAINED A
FALSE STATEMENT OR FALSE INFORMATION, AND WITH INTENT TO DEFRAUD THE
STATE OR ANY POLITICAL SUBDIVISION THEREOF, OFFERED OR PRESENTED THE
SAME TO A PUBLIC OFFICE OR PUBLIC SERVANT KNOWING OR BELIEVING THAT IT
WOULD BE FILED WITH, REGISTERED OR RECORDED IN, OR OTHERWISE BECOME A
PART OF THE RECORDS OF SUCH PUBLIC OFFICE OR PUBLIC SERVANT.

FOURTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF FALSIFYING BUSINESS RECORDS IN THE FIRST
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT MARCH 04, 2016
IN THE COUNTY OF QUEENS, WITH THE INTENT TO DEFRAUD, MADE OR CAUSED A
FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, AND THEIR INTENT
TO DEFRAUD INCLUDED AN INTENT TO COMMIT ANOTHER CRIME OR CONCEAL THE
COMMISSION THEREOF.

FIFTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF OFFERING A FALSE INSTRUMENT FOR FILING IN
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT MARCH 05, 2016
IN THE COUNTY OF QUEENS, KNOWING THAT A WRITTEN INSTRUMENT CONTAINED A
FALSE STATEMENT OR FALSE INFORMATION, AND WITH INTENT TO DEFRAUD THE
STATE OR ANY POLITICAL SUBDIVISION THEREOF, OFFERED OR PRESENTED THE
SAME TO A PUBLIC OFFICE OR PUBLIC SERVANT KNOWING OR BELIEVING THAT IT
WOULD BE FILED WITH, REGISTERED OR RECORDED IN, OR OTHERWISE BECOME A
PART OF THE RECORDS OF SUCH PUBLIC OFFICE OR PUBLIC SERVANT.

SIXTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF FALSIFYING BUSINESS RECORDS IN THE FIRST
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT MARCH 05, 2016
IN THE COUNTY OF QUEENS, WITH THE INTENT TO DEFRAUD, MADE OR CAUSED A
FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, AND THEIR INTENT
TO DEFRAUD INCLUDED AN INTENT TO COMMIT ANOTHER CRIME OR CONCEAL THE
COMMISSION THEREOF.

SEVENTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF OFFERING A FALSE INSTRUMENT FOR FILING IN
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT JULY 22,
2016 IN THE COUNTY OF QUEENS, KNOWING THAT A WRITTEN INSTRUMENT
CONTAINED A FALSE STATEMENT OR FALSE INFORMATION, AND WITH INTENT TO
DEFRAUD THE STATE OR ANY POLITICAL SUBDIVISION THEREOF, OFFERED OR
PRESENTED THE SAME TO A PUBLIC OFFICE OR PUBLIC SERVANT KNOWING OR
BELIEVING THAT IT WOULD BE FILED WITH, REGISTERED OR RECORDED IN, OR
OTHERWISE BECOME A PART OF THE RECORDS OF SUCH PUBLIC OFFICE OR PUBLIC
SERVANT.

EIGHTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF FALSIFYING BUSINESS RECORDS IN THE FIRST
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT JULY 22,
2016 IN THE COUNTY OF QUEENS, WITH THE INTENT TO DEFRAUD, MADE OR CAUSED
A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, AND THEIR INTENT
TO DEFRAUD INCLUDED AN INTENT TO COMMIT ANOTHER CRIME OR CONCEAL THE
COMMISSION THEREOF.

NINETEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF OFFERING A FALSE INSTRUMENT FOR FILING IN
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT JULY 28,
2016 IN THE COUNTY OF QUEENS, KNOWING THAT A WRITTEN INSTRUMENT
CONTAINED A FALSE STATEMENT OR FALSE INFORMATION, AND WITH INTENT TO
DEFRAUD THE STATE OR ANY POLITICAL SUBDIVISION THEREOF, OFFERED OR
PRESENTED THE SAME TO A PUBLIC OFFICE OR PUBLIC SERVANT KNOWING OR
BELIEVING THAT IT WOULD BE FILED WITH, REGISTERED OR RECORDED IN, OR
OTHERWISE BECOME A PART OF THE RECORDS OF SUCH PUBLIC OFFICE OR PUBLIC
SERVANT.

TWENTIETH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF FALSIFYING BUSINESS RECORDS IN THE FIRST
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT JULY 28,
2016 IN THE COUNTY OF QUEENS, WITH THE INTENT TO DEFRAUD, MADE OR CAUSED
A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, AND THEIR INTENT
TO DEFRAUD INCLUDED AN INTENT TO COMMIT ANOTHER CRIME OR CONCEAL THE
COMMISSION THEREOF.

TWENTY FIRST COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF OFFERING A FALSE INSTRUMENT FOR FILING IN
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT FEBRUARY 08,
2017 IN THE COUNTY OF QUEENS, KNOWING THAT A WRITTEN INSTRUMENT
CONTAINED A FALSE STATEMENT OR FALSE INFORMATION, AND WITH INTENT TO
DEFRAUD THE STATE OR ANY POLITICAL SUBDIVISION THEREOF, OFFERED OR
PRESENTED THE SAME TO A PUBLIC OFFICE OR PUBLIC SERVANT KNOWING OR
BELIEVING THAT IT WOULD BE FILED WITH, REGISTERED OR RECORDED IN, OR
OTHERWISE BECOME A PART OF THE RECORDS OF SUCH PUBLIC OFFICE OR PUBLIC
SERVANT.

TWENTY SECOND COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF FALSIFYING BUSINESS RECORDS IN THE FIRST
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT FEBRUARY 08,
2017 IN THE COUNTY OF QUEENS, WITH THE INTENT TO DEFRAUD, MADE OR CAUSED
A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, AND THEIR INTENT
TO DEFRAUD INCLUDED AN INTENT TO COMMIT ANOTHER CRIME OR CONCEAL THE
COMMISSION THEREOF.

TWENTY THIRD COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF OFFERING A FALSE INSTRUMENT FOR FILING IN
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT MAY 04, 2016
IN THE COUNTY OF QUEENS, KNOWING THAT A WRITTEN INSTRUMENT CONTAINED A
FALSE STATEMENT OR FALSE INFORMATION, AND WITH INTENT TO DEFRAUD THE
STATE OR ANY POLITICAL SUBDIVISION THEREOF, OFFERED OR PRESENTED THE
SAME TO A PUBLIC OFFICE OR PUBLIC SERVANT KNOWING OR BELIEVING THAT IT
WOULD BE FILED WITH, REGISTERED OR RECORDED IN, OR OTHERWISE BECOME A
PART OF THE RECORDS OF SUCH PUBLIC OFFICE OR PUBLIC SERVANT.

TWENTY FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF FALSIFYING BUSINESS RECORDS IN THE FIRST
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT MAY 04, 2016
IN THE COUNTY OF QUEENS, WITH THE INTENT TO DEFRAUD, MADE OR CAUSED A
FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, AND THEIR INTENT
TO DEFRAUD INCLUDED AN INTENT TO COMMIT ANOTHER CRIME OR CONCEAL THE
COMMISSION THEREOF.

TWENTY FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF OFFERING A FALSE INSTRUMENT FOR FILING IN
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT MAY 04, 2016
IN THE COUNTY OF QUEENS, KNOWING THAT A WRITTEN INSTRUMENT CONTAINED A
FALSE STATEMENT OR FALSE INFORMATION, AND WITH INTENT TO DEFRAUD THE
STATE OR ANY POLITICAL SUBDIVISION THEREOF, OFFERED OR PRESENTED THE
SAME TO A PUBLIC OFFICE OR PUBLIC SERVANT KNOWING OR BELIEVING THAT IT
WOULD BE FILED WITH, REGISTERED OR RECORDED IN, OR OTHERWISE BECOME A
PART OF THE RECORDS OF SUCH PUBLIC OFFICE OR PUBLIC SERVANT.

TWENTY SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF FALSIFYING BUSINESS RECORDS IN THE FIRST
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT MAY 04, 2016
IN THE COUNTY OF QUEENS, WITH THE INTENT TO DEFRAUD, MADE OR CAUSED A
FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, AND THEIR INTENT
TO DEFRAUD INCLUDED AN INTENT TO COMMIT ANOTHER CRIME OR CONCEAL THE
COMMISSION THEREOF.

TWENTY SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF OFFERING A FALSE INSTRUMENT FOR FILING IN
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT AUGUST 25,
2016 IN THE COUNTY OF QUEENS, KNOWING THAT A WRITTEN INSTRUMENT
CONTAINED A FALSE STATEMENT OR FALSE INFORMATION, AND WITH INTENT TO
DEFRAUD THE STATE OR ANY POLITICAL SUBDIVISION THEREOF, OFFERED OR
PRESENTED THE SAME TO A PUBLIC OFFICE OR PUBLIC SERVANT KNOWING OR
BELIEVING THAT IT WOULD BE FILED WITH, REGISTERED OR RECORDED IN, OR
OTHERWISE BECOME A PART OF THE RECORDS OF SUCH PUBLIC OFFICE OR PUBLIC
SERVANT.

TWENTY EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF FALSIFYING BUSINESS RECORDS IN THE FIRST
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT AUGUST 25,
2016 IN THE COUNTY OF QUEENS, WITH THE INTENT TO DEFRAUD, MADE OR CAUSED
A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, AND THEIR INTENT
TO DEFRAUD INCLUDED AN INTENT TO COMMIT ANOTHER CRIME OR CONCEAL THE
COMMISSION THEREOF.

TWENTY NINTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF OFFERING A FALSE INSTRUMENT FOR FILING IN
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT JULY 11,
2016 IN THE COUNTY OF QUEENS, KNOWING THAT A WRITTEN INSTRUMENT
CONTAINED A FALSE STATEMENT OR FALSE INFORMATION, AND WITH INTENT TO
DEFRAUD THE STATE OR ANY POLITICAL SUBDIVISION THEREOF, OFFERED OR
PRESENTED THE SAME TO A PUBLIC OFFICE OR PUBLIC SERVANT KNOWING OR
BELIEVING THAT IT WOULD BE FILED WITH, REGISTERED OR RECORDED IN, OR
OTHERWISE BECOME A PART OF THE RECORDS OF SUCH PUBLIC OFFICE OR PUBLIC
SERVANT.

THIRTIETH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF FALSIFYING BUSINESS RECORDS IN THE FIRST
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT JULY 11,
2016 IN THE COUNTY OF QUEENS, WITH THE INTENT TO DEFRAUD, MADE OR CAUSED
A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, AND THEIR INTENT
TO DEFRAUD INCLUDED AN INTENT TO COMMIT ANOTHER CRIME OR CONCEAL THE
COMMISSION THEREOF.

THIRTY FIRST COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF OFFERING A FALSE INSTRUMENT FOR FILING IN
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT AUGUST 25,
2016 IN THE COUNTY OF QUEENS, KNOWING THAT A WRITTEN INSTRUMENT
CONTAINED A FALSE STATEMENT OR FALSE INFORMATION, AND WITH INTENT TO
DEFRAUD THE STATE OR ANY POLITICAL SUBDIVISION THEREOF, OFFERED OR
PRESENTED THE SAME TO A PUBLIC OFFICE OR PUBLIC SERVANT KNOWING OR
BELIEVING THAT IT WOULD BE FILED WITH, REGISTERED OR RECORDED IN, OR
OTHERWISE BECOME A PART OF THE RECORDS OF SUCH PUBLIC OFFICE OR PUBLIC
SERVANT.

THIRTY SECOND COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF FALSIFYING BUSINESS RECORDS IN THE FIRST
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT AUGUST 25,
2016 IN THE COUNTY OF QUEENS, WITH THE INTENT TO DEFRAUD, MADE OR CAUSED
A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, AND THEIR INTENT
TO DEFRAUD INCLUDED AN INTENT TO COMMIT ANOTHER CRIME OR CONCEAL THE
COMMISSION THEREOF.

THIRTY THIRD COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF OFFERING A FALSE INSTRUMENT FOR FILING IN
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT OCTOBER 17,
2016 IN THE COUNTY OF QUEENS, KNOWING THAT A WRITTEN INSTRUMENT
CONTAINED A FALSE STATEMENT OR FALSE INFORMATION, AND WITH INTENT TO
DEFRAUD THE STATE OR ANY POLITICAL SUBDIVISION THEREOF, OFFERED OR
PRESENTED THE SAME TO A PUBLIC OFFICE OR PUBLIC SERVANT KNOWING OR
BELIEVING THAT IT WOULD BE FILED WITH, REGISTERED OR RECORDED IN, OR
OTHERWISE BECOME A PART OF THE RECORDS OF SUCH PUBLIC OFFICE OR PUBLIC
SERVANT.

THIRTY FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF FALSIFYING BUSINESS RECORDS IN THE FIRST
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT OCTOBER 17,
2016 IN THE COUNTY OF QUEENS, WITH THE INTENT TO DEFRAUD, MADE OR CAUSED
A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, AND THEIR INTENT
TO DEFRAUD INCLUDED AN INTENT TO COMMIT ANOTHER CRIME OR CONCEAL THE
COMMISSION THEREOF.

THIRTY FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF OFFERING A FALSE INSTRUMENT FOR FILING IN
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT OCTOBER 17,
2016 IN THE COUNTY OF QUEENS, KNOWING THAT A WRITTEN INSTRUMENT
CONTAINED A FALSE STATEMENT OR FALSE INFORMATION, AND WITH INTENT TO
DEFRAUD THE STATE OR ANY POLITICAL SUBDIVISION THEREOF, OFFERED OR
PRESENTED THE SAME TO A PUBLIC OFFICE OR PUBLIC SERVANT KNOWING OR
BELIEVING THAT IT WOULD BE FILED WITH, REGISTERED OR RECORDED IN, OR
OTHERWISE BECOME A PART OF THE RECORDS OF SUCH PUBLIC OFFICE OR PUBLIC
SERVANT.

THIRTY SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF FALSIFYING BUSINESS RECORDS IN THE FIRST
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT OCTOBER 17,
2016 IN THE COUNTY OF QUEENS, WITH THE INTENT TO DEFRAUD, MADE OR CAUSED
A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, AND THEIR INTENT
TO DEFRAUD INCLUDED AN INTENT TO COMMIT ANOTHER CRIME OR CONCEAL THE
COMMISSION THEREOF.

THIRTY SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF OFFERING A FALSE INSTRUMENT FOR FILING IN
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT JUNE 07,
2016 IN THE COUNTY OF QUEENS, KNOWING THAT A WRITTEN INSTRUMENT
CONTAINED A FALSE STATEMENT OR FALSE INFORMATION, AND WITH INTENT TO
DEFRAUD THE STATE OR ANY POLITICAL SUBDIVISION THEREOF, OFFERED OR
PRESENTED THE SAME TO A PUBLIC OFFICE OR PUBLIC SERVANT KNOWING OR
BELIEVING THAT IT WOULD BE FILED WITH, REGISTERED OR RECORDED IN, OR
OTHERWISE BECOME A PART OF THE RECORDS OF SUCH PUBLIC OFFICE OR PUBLIC
SERVANT.

THIRTY EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF FALSIFYING BUSINESS RECORDS IN THE FIRST
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT JUNE 07,
2016 IN THE COUNTY OF QUEENS, WITH THE INTENT TO DEFRAUD, MADE OR CAUSED
A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, AND THEIR INTENT
TO DEFRAUD INCLUDED AN INTENT TO COMMIT ANOTHER CRIME OR CONCEAL THE
COMMISSION THEREOF.

THIRTY NINTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF OFFERING A FALSE INSTRUMENT FOR FILING IN
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT JUNE 07,
2016 IN THE COUNTY OF QUEENS, KNOWING THAT A WRITTEN INSTRUMENT
CONTAINED A FALSE STATEMENT OR FALSE INFORMATION, AND WITH INTENT TO
DEFRAUD THE STATE OR ANY POLITICAL SUBDIVISION THEREOF, OFFERED OR
PRESENTED THE SAME TO A PUBLIC OFFICE OR PUBLIC SERVANT KNOWING OR
BELIEVING THAT IT WOULD BE FILED WITH, REGISTERED OR RECORDED IN, OR
OTHERWISE BECOME A PART OF THE RECORDS OF SUCH PUBLIC OFFICE OR PUBLIC
SERVANT.

FORTIETH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF FALSIFYING BUSINESS RECORDS IN THE FIRST
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT JUNE 07,
2016 IN THE COUNTY OF QUEENS, WITH THE INTENT TO DEFRAUD, MADE OR CAUSED
A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, AND THEIR INTENT
TO DEFRAUD INCLUDED AN INTENT TO COMMIT ANOTHER CRIME OR CONCEAL THE
COMMISSION THEREOF.

FORTY FIRST COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF OFFERING A FALSE INSTRUMENT FOR FILING IN
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT APRIL 19, 2016
IN THE COUNTY OF QUEENS, KNOWING THAT A WRITTEN INSTRUMENT CONTAINED A
FALSE STATEMENT OR FALSE INFORMATION, AND WITH INTENT TO DEFRAUD THE
STATE OR ANY POLITICAL SUBDIVISION THEREOF, OFFERED OR PRESENTED THE
SAME TO A PUBLIC OFFICE OR PUBLIC SERVANT KNOWING OR BELIEVING THAT IT
WOULD BE FILED WITH, REGISTERED OR RECORDED IN, OR OTHERWISE BECOME A
PART OF THE RECORDS OF SUCH PUBLIC OFFICE OR PUBLIC SERVANT.

FORTY SECOND COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF FALSIFYING BUSINESS RECORDS IN THE FIRST
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT APRIL 19, 2016
IN THE COUNTY OF QUEENS, WITH THE INTENT TO DEFRAUD, MADE OR CAUSED A
FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, AND THEIR INTENT
TO DEFRAUD INCLUDED AN INTENT TO COMMIT ANOTHER CRIME OR CONCEAL THE
COMMISSION THEREOF.

FORTY THIRD COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF OFFERING A FALSE INSTRUMENT FOR FILING IN
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT MARCH 04, 2016
IN THE COUNTY OF QUEENS, KNOWING THAT A WRITTEN INSTRUMENT CONTAINED A
FALSE STATEMENT OR FALSE INFORMATION, AND WITH INTENT TO DEFRAUD THE
STATE OR ANY POLITICAL SUBDIVISION THEREOF, OFFERED OR PRESENTED THE
SAME TO A PUBLIC OFFICE OR PUBLIC SERVANT KNOWING OR BELIEVING THAT IT
WOULD BE FILED WITH, REGISTERED OR RECORDED IN, OR OTHERWISE BECOME A
PART OF THE RECORDS OF SUCH PUBLIC OFFICE OR PUBLIC SERVANT.

FORTY FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF FALSIFYING BUSINESS RECORDS IN THE FIRST
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT MARCH 04, 2016
IN THE COUNTY OF QUEENS, WITH THE INTENT TO DEFRAUD, MADE OR CAUSED A
FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, AND THEIR INTENT
TO DEFRAUD INCLUDED AN INTENT TO COMMIT ANOTHER CRIME OR CONCEAL THE
COMMISSION THEREOF.

FORTY FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF OFFERING A FALSE INSTRUMENT FOR FILING IN
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT MARCH 04, 2016
IN THE COUNTY OF QUEENS, KNOWING THAT A WRITTEN INSTRUMENT CONTAINED A
FALSE STATEMENT OR FALSE INFORMATION, AND WITH INTENT TO DEFRAUD THE
STATE OR ANY POLITICAL SUBDIVISION THEREOF, OFFERED OR PRESENTED THE
SAME TO A PUBLIC OFFICE OR PUBLIC SERVANT KNOWING OR BELIEVING THAT IT
WOULD BE FILED WITH, REGISTERED OR RECORDED IN, OR OTHERWISE BECOME A
PART OF THE RECORDS OF SUCH PUBLIC OFFICE OR PUBLIC SERVANT.

FORTY SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF FALSIFYING BUSINESS RECORDS IN THE FIRST
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT MARCH 04, 2016
IN THE COUNTY OF QUEENS, WITH THE INTENT TO DEFRAUD, MADE OR CAUSED A
FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, AND THEIR INTENT
TO DEFRAUD INCLUDED AN INTENT TO COMMIT ANOTHER CRIME OR CONCEAL THE
COMMISSION THEREOF.

FORTY SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF OFFERING A FALSE INSTRUMENT FOR FILING IN
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT DECEMBER 12,
2016 IN THE COUNTY OF QUEENS, KNOWING THAT A WRITTEN INSTRUMENT
CONTAINED A FALSE STATEMENT OR FALSE INFORMATION, AND WITH INTENT TO
DEFRAUD THE STATE OR ANY POLITICAL SUBDIVISION THEREOF, OFFERED OR
PRESENTED THE SAME TO A PUBLIC OFFICE OR PUBLIC SERVANT KNOWING OR
BELIEVING THAT IT WOULD BE FILED WITH, REGISTERED OR RECORDED IN, OR
OTHERWISE BECOME A PART OF THE RECORDS OF SUCH PUBLIC OFFICE OR PUBLIC
SERVANT.

FORTY EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF FALSIFYING BUSINESS RECORDS IN THE FIRST
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT DECEMBER 12,
2016 IN THE COUNTY OF QUEENS, WITH THE INTENT TO DEFRAUD, MADE OR CAUSED
A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, AND THEIR INTENT
TO DEFRAUD INCLUDED AN INTENT TO COMMIT ANOTHER CRIME OR CONCEAL THE
COMMISSION THEREOF.

FORTY NINTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF OFFERING A FALSE INSTRUMENT FOR FILING IN
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT FEBRUARY 06,
2017 IN THE COUNTY OF QUEENS, KNOWING THAT A WRITTEN INSTRUMENT
CONTAINED A FALSE STATEMENT OR FALSE INFORMATION, AND WITH INTENT TO
DEFRAUD THE STATE OR ANY POLITICAL SUBDIVISION THEREOF, OFFERED OR
PRESENTED THE SAME TO A PUBLIC OFFICE OR PUBLIC SERVANT KNOWING OR
BELIEVING THAT IT WOULD BE FILED WITH, REGISTERED OR RECORDED IN, OR
OTHERWISE BECOME A PART OF THE RECORDS OF SUCH PUBLIC OFFICE OR PUBLIC
SERVANT.

FIFTIETH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF FALSIFYING BUSINESS RECORDS IN THE FIRST
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT FEBRUARY 06,
2017 IN THE COUNTY OF QUEENS, WITH THE INTENT TO DEFRAUD, MADE OR CAUSED
A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, AND THEIR INTENT
TO DEFRAUD INCLUDED AN INTENT TO COMMIT ANOTHER CRIME OR CONCEAL THE
COMMISSION THEREOF.

FIFTY FIRST COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF OFFERING A FALSE INSTRUMENT FOR FILING IN
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT FEBRUARY 06,
2017 IN THE COUNTY OF QUEENS, KNOWING THAT A WRITTEN INSTRUMENT
CONTAINED A FALSE STATEMENT OR FALSE INFORMATION, AND WITH INTENT TO
DEFRAUD THE STATE OR ANY POLITICAL SUBDIVISION THEREOF, OFFERED OR
PRESENTED THE SAME TO A PUBLIC OFFICE OR PUBLIC SERVANT KNOWING OR
BELIEVING THAT IT WOULD BE FILED WITH, REGISTERED OR RECORDED IN, OR
OTHERWISE BECOME A PART OF THE RECORDS OF SUCH PUBLIC OFFICE OR PUBLIC
SERVANT.

FIFTY SECOND COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF FALSIFYING BUSINESS RECORDS IN THE FIRST
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT FEBRUARY 06,
2017 IN THE COUNTY OF QUEENS, WITH THE INTENT TO DEFRAUD, MADE OR CAUSED
A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, AND THEIR INTENT
TO DEFRAUD INCLUDED AN INTENT TO COMMIT ANOTHER CRIME OR CONCEAL THE
COMMISSION THEREOF.

FIFTY THIRD COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF OFFERING A FALSE INSTRUMENT FOR FILING IN
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT NOVEMBER 04,
2016 IN THE COUNTY OF QUEENS, KNOWING THAT A WRITTEN INSTRUMENT
CONTAINED A FALSE STATEMENT OR FALSE INFORMATION, AND WITH INTENT TO
DEFRAUD THE STATE OR ANY POLITICAL SUBDIVISION THEREOF, OFFERED OR
PRESENTED THE SAME TO A PUBLIC OFFICE OR PUBLIC SERVANT KNOWING OR
BELIEVING THAT IT WOULD BE FILED WITH, REGISTERED OR RECORDED IN, OR
OTHERWISE BECOME A PART OF THE RECORDS OF SUCH PUBLIC OFFICE OR PUBLIC
SERVANT.

FIFTY FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF FALSIFYING BUSINESS RECORDS IN THE FIRST
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT NOVEMBER 04,
2016 IN THE COUNTY OF QUEENS, WITH THE INTENT TO DEFRAUD, MADE OR CAUSED
A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, AND THEIR INTENT
TO DEFRAUD INCLUDED AN INTENT TO COMMIT ANOTHER CRIME OR CONCEAL THE
COMMISSION THEREOF.

FIFTY FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF OFFERING A FALSE INSTRUMENT FOR FILING IN
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT NOVEMBER 04,
2016 IN THE COUNTY OF QUEENS, KNOWING THAT A WRITTEN INSTRUMENT
CONTAINED A FALSE STATEMENT OR FALSE INFORMATION, AND WITH INTENT TO
DEFRAUD THE STATE OR ANY POLITICAL SUBDIVISION THEREOF, OFFERED OR
PRESENTED THE SAME TO A PUBLIC OFFICE OR PUBLIC SERVANT KNOWING OR
BELIEVING THAT IT WOULD BE FILED WITH, REGISTERED OR RECORDED IN, OR
OTHERWISE BECOME A PART OF THE RECORDS OF SUCH PUBLIC OFFICE OR PUBLIC
SERVANT.

FIFTY SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF FALSIFYING BUSINESS RECORDS IN THE FIRST
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT NOVEMBER 04,
2016 IN THE COUNTY OF QUEENS, WITH THE INTENT TO DEFRAUD, MADE OR CAUSED
A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, AND THEIR INTENT
TO DEFRAUD INCLUDED AN INTENT TO COMMIT ANOTHER CRIME OR CONCEAL THE
COMMISSION THEREOF.

FIFTY SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF OFFERING A FALSE INSTRUMENT FOR FILING IN
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT NOVEMBER 16,
2017 IN THE COUNTY OF QUEENS, KNOWING THAT A WRITTEN INSTRUMENT
CONTAINED A FALSE STATEMENT OR FALSE INFORMATION, AND WITH INTENT TO
DEFRAUD THE STATE OR ANY POLITICAL SUBDIVISION THEREOF, OFFERED OR
PRESENTED THE SAME TO A PUBLIC OFFICE OR PUBLIC SERVANT KNOWING OR
BELIEVING THAT IT WOULD BE FILED WITH, REGISTERED OR RECORDED IN, OR
OTHERWISE BECOME A PART OF THE RECORDS OF SUCH PUBLIC OFFICE OR PUBLIC
SERVANT.

FIFTY EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF FALSIFYING BUSINESS RECORDS IN THE FIRST
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT NOVEMBER 16,
2017 IN THE COUNTY OF QUEENS, WITH THE INTENT TO DEFRAUD, MADE OR CAUSED
A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, AND THEIR INTENT
TO DEFRAUD INCLUDED AN INTENT TO COMMIT ANOTHER CRIME OR CONCEAL THE
COMMISSION THEREOF.

FIFTY NINTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF OFFERING A FALSE INSTRUMENT FOR FILING IN
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT JANUARY 25,
2016 IN THE COUNTY OF QUEENS, KNOWING THAT A WRITTEN INSTRUMENT
CONTAINED A FALSE STATEMENT OR FALSE INFORMATION, AND WITH INTENT TO
DEFRAUD THE STATE OR ANY POLITICAL SUBDIVISION THEREOF, OFFERED OR
PRESENTED THE SAME TO A PUBLIC OFFICE OR PUBLIC SERVANT KNOWING OR
BELIEVING THAT IT WOULD BE FILED WITH, REGISTERED OR RECORDED IN, OR
OTHERWISE BECOME A PART OF THE RECORDS OF SUCH PUBLIC OFFICE OR PUBLIC
SERVANT.

SIXTIETH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF FALSIFYING BUSINESS RECORDS IN THE FIRST
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT JANUARY 25,
2016 IN THE COUNTY OF QUEENS, WITH THE INTENT TO DEFRAUD, MADE OR CAUSED
A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, AND THEIR INTENT
TO DEFRAUD INCLUDED AN INTENT TO COMMIT ANOTHER CRIME OR CONCEAL THE
COMMISSION THEREOF.

SIXTY FIRST COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF OFFERING A FALSE INSTRUMENT FOR FILING IN
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT MAY 04, 2017
IN THE COUNTY OF QUEENS, KNOWING THAT A WRITTEN INSTRUMENT CONTAINED A
FALSE STATEMENT OR FALSE INFORMATION, AND WITH INTENT TO DEFRAUD THE
STATE OR ANY POLITICAL SUBDIVISION THEREOF, OFFERED OR PRESENTED THE
SAME TO A PUBLIC OFFICE OR PUBLIC SERVANT KNOWING OR BELIEVING THAT IT
WOULD BE FILED WITH, REGISTERED OR RECORDED IN, OR OTHERWISE BECOME A
PART OF THE RECORDS OF SUCH PUBLIC OFFICE OR PUBLIC SERVANT.

SIXTY SECOND COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF FALSIFYING BUSINESS RECORDS IN THE FIRST
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT MAY 04, 2017
IN THE COUNTY OF QUEENS, WITH THE INTENT TO DEFRAUD, MADE OR CAUSED A
FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, AND THEIR INTENT
TO DEFRAUD INCLUDED AN INTENT TO COMMIT ANOTHER CRIME OR CONCEAL THE
COMMISSION THEREOF.

SIXTY THIRD COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF OFFERING A FALSE INSTRUMENT FOR FILING IN
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT MARCH 22, 2016
IN THE COUNTY OF QUEENS, KNOWING THAT A WRITTEN INSTRUMENT CONTAINED A
FALSE STATEMENT OR FALSE INFORMATION, AND WITH INTENT TO DEFRAUD THE
STATE OR ANY POLITICAL SUBDIVISION THEREOF, OFFERED OR PRESENTED THE
SAME TO A PUBLIC OFFICE OR PUBLIC SERVANT KNOWING OR BELIEVING THAT IT
WOULD BE FILED WITH, REGISTERED OR RECORDED IN, OR OTHERWISE BECOME A
PART OF THE RECORDS OF SUCH PUBLIC OFFICE OR PUBLIC SERVANT.

SIXTY FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF FALSIFYING BUSINESS RECORDS IN THE FIRST
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT MARCH 22, 2016
IN THE COUNTY OF QUEENS, WITH THE INTENT TO DEFRAUD, MADE OR CAUSED A
FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, AND THEIR INTENT
TO DEFRAUD INCLUDED AN INTENT TO COMMIT ANOTHER CRIME OR CONCEAL THE
COMMISSION THEREOF.

SIXTY FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF OFFERING A FALSE INSTRUMENT FOR FILING IN
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT MARCH 22, 2016
IN THE COUNTY OF QUEENS, KNOWING THAT A WRITTEN INSTRUMENT CONTAINED A
FALSE STATEMENT OR FALSE INFORMATION, AND WITH INTENT TO DEFRAUD THE
STATE OR ANY POLITICAL SUBDIVISION THEREOF, OFFERED OR PRESENTED THE
SAME TO A PUBLIC OFFICE OR PUBLIC SERVANT KNOWING OR BELIEVING THAT IT
WOULD BE FILED WITH, REGISTERED OR RECORDED IN, OR OTHERWISE BECOME A
PART OF THE RECORDS OF SUCH PUBLIC OFFICE OR PUBLIC SERVANT.

SIXTY SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF FALSIFYING BUSINESS RECORDS IN THE FIRST
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT MARCH 22,
2016 IN THE COUNTY OF QUEENS, WITH THE INTENT TO DEFRAUD, MADE OR
CAUSED A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, AND
THEIR INTENT TO DEFRAUD INCLUDED AN INTENT TO COMMIT ANOTHER CRIME OR
CONCEAL THE COMMISSION THEREOF.

A handwritten signature in black ink, appearing to read "Melinda Katz". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

MELINDA KATZ
DISTRICT ATTORNEY