

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS: CRIMINAL TERM

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THE PEOPLE OF THE STATE OF NEW YORK

- against -

Attorney General
Indictment No. 2899/2006

LOUIS SANDELLA, MICHAEL SANDELLA, KIM MOSS
FONTANEZ, ANDREAS PERDIKOS, DANIELLE MOSS,
GERALDINE MOSS, GARY S. SHAW, and IDA D'ANGELO,
Defendants.

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COUNT ONE

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment accuses LOUIS
SANDELLA, MICHAEL SANDELLA, KIM MOSS FONTANEZ, ANDREAS PERDIKOS,
DANIELLE MOSS, GERALDINE MOSS, GARY S. SHAW, and IDA D'ANGELO of the crime
of **ENTERPRISE CORRUPTION**, in violation of Penal Law Section 460.20(1)(a), committed
as follows:

The defendants, and others acting in concert with them, in the County of Kings and
elsewhere, during a period from October, 2001 to on or about August, 2004, having knowledge
of the existence of a criminal enterprise (hereinafter "the Sandella Group", "the criminal
enterprise", and "the enterprise") and the nature of its activities, and being employed by and
associated with such enterprise, intentionally conducted and participated in the affairs of an
enterprise, by participating in a pattern of criminal activity.

The Sandella Group consisted of a group of persons and corporations including the defendants and others, known and unknown to the Grand Jury, sharing a common purpose of engaging in criminal conduct, associated in an ascertainable structure distinct from a pattern of criminal activity, and with a continuity of existence, structure and criminal purpose beyond the scope of individual criminal incidents.

INTRODUCTION

The Sandella Group was a criminal enterprise that was in existence during January, 2001, through August, 2004. It was comprised of mortgage brokers, lawyers, real estate appraisers, bank employees, and others. Pretending to perform their various roles and duties legitimately, the members of the enterprise instead worked together to obtain mortgages fraudulently, to divert portions of the loan proceeds to the criminal enterprise, and then repeatedly to allow the mortgages to go into default. In some instances, this scheme defrauded the bank that made the original loan; in other instances it defrauded a financial entity that later purchased the mortgage; and, in yet other instances, it defrauded both.

THE CRIMINAL ENTERPRISE

The Sandella Criminal Enterprise was a group of individuals that included the defendants and numerous others employed by and associated with them.

Common Criminal Purpose

The purpose of the Sandella Criminal Enterprise was to steal money from banks and other financial institutions through fraudulent real estate transactions. During its existence, the members of this criminal enterprise defrauded financial institutions of millions of dollars by submitting false and forged documents to receive mortgage loans. These documents contained false statements about the true identity of real estate purchasers, their financial qualifications, the value of the real estate, the actual purchase price of the real estate, and the identities of those individuals who received loan proceeds.

The Sandella Group paid people to pose as legitimate purchasers of real estate. The enterprise secretly told these "straw buyers" that it, not they, would repay the loans. The enterprise submitted documents to banks that materially misrepresented the financial qualifications of the straw buyers, in that they contained lies concerning the straw buyers' income, employment history, and financial assets. It submitted forged bank account statements and letters from non-existent landlords and employers.

The Sandella Group similarly deceived the banks about the value of the properties being purchased. It submitted false real estate appraisal reports to banks that, among other things, misrepresented the physical conditions of the properties, the market value of comparable properties, and the identities of the individuals who prepared the reports. Through these reports, the values of individual properties that were used in these fraudulent mortgage transactions were often inflated by \$100,000 or more.

The Sandella Group additionally deceived the banks about the actual sale prices of the properties, which were lower than reflected on the fraudulent loan applications. The banks thus repeatedly lent more money than the properties actually cost.

The Sandella Group routinely failed to make payments on the illicitly obtained loans, causing the loans to go into default. As a result, banks, or the financial entities to whom the banks had sold the mortgages, were left to foreclose on properties that had been fraudulently overvalued. In other instances, to ward off foreclosure, the criminal enterprise set up a second sham transaction, satisfying the initial mortgage by defrauding a new bank. To distribute its illicit proceeds to its members and associates, the Sandella Group deceived the banks about who actually received the loan money. Many thousands of dollars did not go to the seller, as the records submitted to banks falsely reflected. Instead, portions of the money were laundered through corporate shells or the bank accounts of the real estate attorneys who were members of the criminal enterprise. The Sandella Group also rewarded members of the criminal enterprise by fraudulently obtaining unduly large mortgages for the personal use of its members or associates. In these cases, the mortgages were not permitted to go to foreclosure. The Sandella Group additionally committed fraud in the secondary mortgage market. This was accomplished because the criminal enterprise was well aware that mortgage agreements that it secured through fraud were usually resold by the banks to other financial institutions. Had these financial institutions known that these mortgages were secured through fraud, they would never have purchased them.

Finally, according to defendant Louis Sandella, a consequence of these frauds has been to raise purchase prices in neighborhoods in which the frauds have been perpetrated, as reflected in the following telephone conversation between defendant Louis Sandella and defendant Gary S. Shaw, on April 29, 2004:

Shaw: But how in God's name did you get—I know the neighborhood—how did you get an appraisal for four-ninety-eight?

Sandella: They're all going, those, those two families, are all going for five hundred or more. The last two years when we were doing so much business, we changed the whole market in Brooklyn.

Structure

The Sandella Group had an ascertainable structure distinct from the pattern of criminal activity engaged in by its members. This structure was carefully designed and maintained to facilitate and encourage the pattern of criminal violations that members of the criminal enterprise committed during its existence, which include scheme to defraud, numerous grand larcenies, and the falsification of business records. Within the structure of the criminal enterprise, each of the defendants had a well-defined role. Louis Sandella was the architect and leader of the criminal enterprise. He primarily determined which properties would fraudulently be bought and sold, the manner and amount by which their value would be falsely inflated, how loan applications were to be falsified, how much straw buyers would be paid, and how members of the criminal enterprise and their associates would divide the criminal proceeds.

Defendant Danielle Moss's role in the enterprise was to relay Louis Sandella's instructions to other members of the enterprise, to notarize fraudulent documents at closings so that banks could be defrauded of money, and to launder part of the criminal enterprise's profits through bank accounts that the enterprise controlled.

Defendant Michael Sandella's role was to direct activities of the criminal enterprise in the field. He found properties for sham transactions, dealt with straw buyers, and used corporations under his control to launder the Group's criminal proceeds.

Defendant Kim Moss Fontanez's role was to manage the criminal enterprise's internal operations. She oversaw the creation of falsified loan applications records and their submission to banks, and coordinated the closings in which money was stolen.

Defendant Andreas Perdikos's role in the enterprise was to author fraudulent real estate appraisal reports. Because Perdikos was not a licensed real estate appraiser, he stole the identities of licensed real estate appraisers and forged their names on the real estate appraisal reports that the Sandella Group used to inflate the value of the residential properties.

Defendant Geraldine Moss's role in the enterprise was to structure sham real estate transactions and falsify straw buyers' financial qualifications, including arranging for cash to be deposited temporarily into straw buyers' bank accounts so that they would appear to be credit-worthy.

Defendants Gary Shaw and Ida D'Angelo were lawyers who nominally represented buyers, sellers or banks. Their role was to create false documents and to use their escrow accounts to distribute the proceeds of the crimes to other members of the criminal enterprise.

These defendants would cause some of these false documents to be presented and filed at the offices of County Registers and County Clerks throughout the New York City metropolitan area.

Various bank employees also played a role in the criminal enterprise. Their role was to process loan applications that they knew to be false and fraudulent, as if the applications were accurate.

In addition, the criminal enterprise derived its structure in large part from its members' affiliations with seemingly legitimate professional and commercial entities. Throughout the enterprise's existence, defendants Louis Sandella, Michael Sandella, Kim Moss Fontanez, Danielle Moss and Geraldine Moss worked for companies nominally in the business of obtaining loans for real estate buyers. Defendants Shaw and D'Angelo were real estate attorneys, purportedly representing the interests of buyers and sellers of real estate and the interests of banks. Other members of the criminal enterprise were employed by banks as loan officers, whose duties included objectively analyzing loan applicants' financial qualifications.

The Operation of the Criminal Enterprise

A fraudulent transaction that demonstrates how the criminal enterprise operated involved a house in Brooklyn, New York.

In January, 2004 the legitimate owner, having purchased the house less than a year earlier for approximately \$250,000, agreed to sell it to the Sandella Group, which used one of its companies, Fort Salonga Management Corp., as a buyer of the property, for \$310,000. However, the contract of sale, signed by the owner and by Gary Shaw, on behalf of Fort Salonga

Management Corp., listed the purchase price as \$410,000. This contract contained a repair credit rider and a closing cost rider providing that up to \$100,000 of the purchase price could be refunded to the buyer.

The criminal enterprise then recruited a straw buyer to pose as the bona fide purchaser of the house. The enterprise agreed to pay the straw buyer several thousand dollars to participate in this transaction.

On or about March 12, 2004, the criminal enterprise caused a fraudulent loan application, bearing the signatures of the straw buyer and of Louis Sandella, to be submitted to the bank. Among other things, the loan application falsely represented that the straw buyer's income was \$94,800 per year. In reality, his annual income was approximately \$24,000. At about the same time, the criminal enterprise also caused a false rental verification letter to be sent to the bank; this letter asserted that the straw buyer was paying approximately double the actual amount of his rent.

The contract of sale that the criminal enterprise submitted to the bank substituted the straw buyer's name as purchaser in place of Fort Salonga Management Corp. and listed the purchase price as \$450,000. The body of this contract provided for a "seller's concession" of only \$27,000, omitting any mention of the repair credit that was in the real contract and thus deceiving the bank into believing the purchase price of the house was \$450,000 rather than \$310,000.

On or about March 22, 2004, the enterprise submitted to the bank a forged Appraisal Report, prepared by defendant Andreas Perdikos, valuing the property at \$450,000.

In support of the increase in the stated market value of the property, from the original purchase price of \$250,000 in 2003 to \$450,000 in 2004, the enterprise caused a false invoice to be submitted to the bank. The fictitious invoice, bearing the name of a construction company, falsely represented that the seller had paid for approximately \$123,000 in repairs and improvements to the property. The invoice was accompanied by a copy of a fictitious check bearing the seller's name for this amount.

Shortly thereafter, the bank agreed to lend the straw buyer \$450,000: \$360,000 as a primary mortgage, and \$90,000 as a secondary mortgage.

On March 29, 2004, the closing occurred. It was attended by the straw buyer, defendant Michael Sandella, defendant Gary Shaw (nominally the straw buyer's attorney), a closing attorney representing the mortgage bank, and the seller and his attorney.

At the closing, the criminal enterprise caused a form known as a "HUD-1 Settlement Statement" to be created that contained numerous false entries. It falsely represented the purchase price, it falsely represented what the buyer paid the seller, and it falsely represented that the buyer had put down a deposit on the property when, in fact, this money was provided by the criminal enterprise itself.

As a result, the enterprise secretly took more than \$120,000, holding it in one of their attorney's escrow accounts. Shortly after the closing, the attorney wired most of the enterprise's criminal profit into two bank accounts controlled by the enterprise.

The lending bank retained its mortgages on the property. However, neither the criminal enterprise nor the straw buyer paid the mortgages, and they fell into default.

Continuity

The Sandella Group was active for many years, including the period charged herein. Its fraudulent activities were widespread and systematic. Throughout this period, its overall structure and criminal purpose remained fixed.

The Sandella Mortgage Group's Pattern of Criminal Activity

During the period of time in which the defendants committed the crime of Enterprise Corruption, as charged in this indictment, they, acting in concert with one another and with other persons known and unknown to the Grand Jury, and having the intent to conduct or participate in the Group's criminal affairs, engaged in the following criminal conduct ("pattern acts").

Pattern Act 1

The defendants LOUIS SANDELLA, MICHAEL SANDELLA, KIM (MOSS) FONTANEZ, DANIELLE MOSS, GERALDINE MOSS, ANDREAS PERDIKOS, GARY S. SHAW, and IDA D'ANGELO committed the crime of SCHEME TO DEFRAUD IN THE FIRST DEGREE, in violation of Penal Law §190.65(1)(b), as follows:

The defendants, on or about and between October 29, 2001 and August 26, 2004, in the County of Kings and other locations in the State of New York, while acting in concert with each other and others known and unknown to the Grand Jury, 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 thereby obtained property, consisting of United States currency and real estate, valued in excess of \$1,000 dollars, from more than one such person.

Pattern Act 2

The defendants LOUIS SANDELLA, MICHAEL SANDELLA, KIM (MOSS) FONTANEZ, DANIELLE MOSS, GERALDINE MOSS, ANDREAS PERDIKOS, GARY S. SHAW, and IDA D'ANGELO committed the crime of GRAND LARCENY IN THE FIRST DEGREE, in violation of Penal Law §155.42, as follows:

The defendants, on or about and between December 4, 2003 and May 28, 2004, in the County of Kings and other locations in the State of New York, while acting in concert with each other and others, and pursuant to a common scheme and plan, stole property, consisting of a quantity of United States currency in excess of one million dollars, from Aegis Funding Corp.

Pattern Act 3

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA and IDA D'ANGELO on or about and between October 29, 2001 and June 22, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 753 Marcy Avenue, Brooklyn, New York, with intent to defraud,

including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, namely, a HUD-1 closing or settlement statement submitted in connection with the first loan.

Pattern Act 4

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First degree [P.L. § 175.10], committed as follows:

The defendant, LOUIS SANDELLA, on or about and between October 29, 2001 and June 22, 2004, in the County of Kings and other locations in the State of New York, acting in concert with others and pursuant to a common scheme and plan, relating to real property located at 753 Marcy Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, namely, a Real Property Contract of Sale.

Pattern Act 5

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA AND IDA D'ANGELO, on or about and between October 29, 2001 and June 22, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 753 Marcy Avenue, Brooklyn, New York, with intent to defraud,

including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, namely, a Real Property Mortgage submitted in connection with the first loan.

Pattern Act 6

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendant, LOUIS SANDELLA, on or about and between October 29, 2001 and June 22, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 753 Marcy Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, namely, a Uniform Residential Loan Application (Form 1003) submitted in connection with the first loan.

Pattern Act 7

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA AND ANDREAS PERDIKOS, on or about and between October 29, 2001 and June 22, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and

plan, relating to real property located at 753 Marcy Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, namely, a Real Property Appraisal Report submitted in connection with the first loan.

As to 756 Marcy Avenue, Brooklyn, New York

Pattern Act 8

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA and IDA D'ANGELO, on or about and between October 29, 2001 and June 22, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 756 Marcy Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the first loan.

Pattern Act 9

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendant, LOUIS SANDELLA, on or about and between October 29, 2001 and June 22, 2004, in the County of Kings and other locations in the State of New York, acting in concert with others and pursuant to a common scheme and plan, relating to real property located at 756 Marcy Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, namely, a Real Property Contract of Sale.

Pattern Act 10

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA and IDA D'ANGELO, on or about and between October 29, 2001 and June 22, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 756 Marcy Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, namely, a Real Property Mortgage submitted in connection with the first loan.

Pattern Act 11

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendant, LOUIS SANDELLA, on or about and between October 29, 2001 and June 22, 2004, in the County of Kings and other locations in the State of New York, acting in concert with others and pursuant to a common scheme and plan, relating to real property located at 756 Marcy Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, namely, a Uniform Residential Loan Application (Form 1003) submitted in connection with the first loan.

Pattern Act 12

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA AND ANDREAS PERDIKOS, on or about and between October 29, 2001 and June 22, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 756 Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, namely, a Real Property Appraisal Report submitted in connection with the first loan.

As to 18 Monroe Avenue, Massapequa, New York, Fisher to Gurel

Pattern Act 13

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Grand Larceny in the Second Degree [P.L. § 155.40(1)], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, KIM (MOSS) FONTANEZ, ANDREAS PERDIKOS, and GARY S. SHAW, on or about and between October 17, 2003 and November 12, 2003, in the County of Nassau and other locations in the State of New York, while acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 18 Monroe Avenue, Massapequa, New York, stole property having an aggregate value exceeding fifty thousand (\$50,000) dollars, namely, a quantity of United States currency from Credit Suisse First Boston.

Pattern Act 14

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, and GARY S. SHAW, on or about and between October 17, 2003 and November 12, 2003, in the County of Nassau and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 18 Monroe Avenue, Massapequa, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the

commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the first loan.

Pattern Act 15

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, and GARY S. SHAW, on or about and between October 17, 2003 and November 12, 2003, in the County of Nassau and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 18 Monroe Avenue, Massapequa, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the second loan.

Pattern Act 16

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, and GARY S. SHAW, on or about and between October 17, 2003 and November 12, 2003, in the County of Nassau and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 18 Monroe Avenue, Massapequa, New

York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, namely, a Real Property Contract of Sale.

Pattern Act 17

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, and GARY S. SHAW, on or about and between October 17, 2003 and November 12, 2003, in the County of Nassau and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 18 Monroe Avenue, Massapequa, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, namely, a Real Property Mortgage submitted in connection with the first loan.

Pattern Act 18

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, and GARY S. SHAW, on or about and between October 17, 2003 and November 12, 2003, in the County of Nassau and other locations in the State of New York, acting in concert with each other and others and pursuant to a

common scheme and plan, relating to real property located at 18 Monroe Avenue, Massapequa, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, namely, a Real Property Mortgage submitted in connection with the second loan.

Pattern Act 19

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA and MICHAEL SANDELLA, on or about and between October 17, 2003 and November 12, 2003, in the County of Nassau and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 18 Monroe Avenue, Massapequa, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, namely, a Uniform Residential Loan Application (Form 1003) submitted in connection with the first loan.

Pattern Act 20

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA and MICHAEL SANDELLA, on or about and between October 17, 2003 and November 12, 2003, in the County of Nassau and other locations in the State

of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 18 Monroe Avenue, Massapequa, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, namely, a Uniform Residential Loan Application (Form 1003) submitted in connection with the second loan.

Pattern Act 21

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and ANDREAS PERDIKOS, on or about and between October 17, 2003 and November 12, 2003, in the County of Nassau and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 18 Monroe Avenue, Massapequa, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, namely, a Real Property Appraisal Report submitted in connection with the first loan.

Pattern Act 22

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and ANDREAS PERDIKOS, on or about and between October 17, 2003 and November 12, 2003, in the County of Nassau and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 18 Monroe Avenue, Massapequa, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, namely, a Real Property Appraisal Report submitted in connection with the second loan.

As to 18 Monroe Avenue, Massapequa, New York, Gurel to Ventura

Pattern Act 23

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Grand Larceny in the Second Degree [P.L. § 155.40(1)], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, KIM (MOSS) FONTANEZ, ANDREAS PERDIKOS, GARY S. SHAW, and IDA D'ANGELO on or about June 24, 2004, in the County of Nassau and other locations in the State of New York, while acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 18 Monroe Avenue, Massapequa, New York, stole property having an aggregate value exceeding fifty thousand (\$50,000) dollars, namely, a quantity of United States currency from Aegis Funding.

As to 150 E. Fulton St., Long Beach, Nassau Co., New York

Pattern Act 24

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Grand Larceny in the Second Degree [P.L. § 155.40(1)], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, KIM (MOSS) FONTANEZ, ANDREAS PERDIKOS, and GARY S. SHAW, on or about December 4, 2003, in the County of Kings and other locations in the State of New York, while acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 150 East Fulton Street, Long Beach, New York, stole property having an aggregate value exceeding fifty thousand (\$50,000) dollars, namely, a quantity of United States currency from Aegis Funding.

Pattern Act 25

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, and GARY S. SHAW, on or about December 4, 2003, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 150 East Fulton Street, Long Beach, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that record being a HUD-1 closing or settlement statement submitted in connection with the first loan.

Pattern Act 26

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, KIM (MOSS) FONTANEZ, and GARY S. SHAW, on or about September 9, 2003, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 150 East Fulton Street, Long Beach, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that record being a Real Property Contract of Sale.

Pattern Act 27

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, and GARY S. SHAW, on or about December 4, 2003, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 150 East Fulton Street, Long Beach, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and

caused a false entry in the business records of an enterprise, that record being a Real Property Mortgage submitted in connection with the first loan.

Pattern Act 28

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA and MICHAEL SANDELLA, on or about or before December 4, 2003, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 150 East Fulton Street, Long Beach, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that record being a Uniform Residential Loan Application (Form 1003) submitted in connection with the first loan.

Pattern Act 29

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and ANDREAS PERDIKOS, on or about and between September 14, 2003 and December 4, 2003, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 150 East Fulton Street,

Long Beach, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that record being a Real Property Appraisal Report submitted in connection with the first loan.

Pattern Act 30

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, and GARY S. SHAW, on or about December 4, 2003, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 150 East Fulton Street, Long Beach, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that record being a Real Property Mortgage submitted in connection with the second loan.

Pattern Act 31

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA and MICHAEL SANDELLA, on or about or before December 4, 2003, in the County of Kings and other locations in the State of New York, acting in

concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 150 East Fulton Street, Long Beach, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that record being a Uniform Residential Loan Application (Form 1003) submitted in connection with the second loan.

Pattern Act 32

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and ANDREAS PERDIKOS, on or about and between September 14, 2003 and December 4, 2003, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 150 East Fulton Street, Long Beach, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that record being a Real Property Appraisal Report submitted in connection with the second loan.

As to 199 Commack Road, Deer Park, New York

Pattern Act 33

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Grand Larceny in the Second Degree [P.L. § 155.40(1)], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GARY S. SHAW and IDA D'ANGELO, on or about and between January 23, 2004 and February 22, 2005, in the County of Kings and other locations in the State of New York, while acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 199 Commack Road, Deer Park, New York, stole property having an aggregate value exceeding fifty thousand (\$50,000) dollars, namely, a quantity of United States currency from Credit Suisse First Boston.

Pattern Act 34

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, ANDREAS PERDIKOS, GARY S. SHAW and IDA D'ANGELO, on or about and between January 23, 2004 and February 22, 2005, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 199 Commack Road, Deer Park, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the first loan.

Pattern Act 35

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GARY S. SHAW, on or about and between January 23, 2004 and February 22, 2005, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 199 Commack Road, Deer Park, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Contract of Sale.

Pattern Act 36

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GARY S. SHAW and IDA D'ANGELO, on or about and between January 23, 2004 and February 22, 2005, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 199 Commack Road, Deer Park, New York, with intent to defraud, including an intent to commit another crime and aid

and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Mortgage submitted in connection with the first loan.

Pattern Act 37

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA and MICHAEL SANDELLA, on or about and between January 23, 2004 and February 22, 2005, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 199 Commack Road, Deer Park, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Uniform Residential Loan Application (Form 1003) submitted in connection with the first loan.

Pattern Act 38

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and ANDREAS PERDIKOS, on or about and between January 23, 2004 and February 22, 2005, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 199 Commack Road,

Deer Park, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Appraisal Report submitted in connection with the first loan.

As to 39 Benjo Drive, Amityville, New York

Pattern Act 39

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Grand Larceny in the Second Degree [P.L. § 155.40(1)], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, ANDREAS PERDIKOS and GARY S. SHAW, on or about and between January 26, 2004 and February 3, 2004, in the County of Kings and other locations in the State of New York, while acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 39 Benjo Drive, Amityville, New York, stole property having an aggregate value exceeding fifty thousand (\$50,000) dollars, namely, a quantity of United States currency from Credit Suisse First Boston.

As to 317 Winthrop Street, Brooklyn, New York

Pattern Act 40

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Grand Larceny in the Second Degree [P.L. § 155.40(1)], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, KIM (MOSS) FONTANEZ, DANIELLE MOSS, GERALDINE MOSS, ANDREAS PERDIKOS, GARY S. SHAW and IDA D'ANGELO, on or about and between January 28, 2004 and June 10, 2004, in the County of Kings and other locations in the State of New York, while acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 317 Winthrop Street, Brooklyn, New York, stole property having an aggregate value exceeding fifty thousand (\$50,000) dollars, namely, a quantity of United States currency from Aegis Funding.

Pattern Act 41

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GERALDINE MOSS, GARY S. SHAW and IDA D'ANGELO, on or about and between January 28, 2004 and June 10, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 317 Winthrop Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the first loan.

Pattern Act 42

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GERALDINE MOSS, GARY S. SHAW and IDA D'ANGELO, on or about and between January 28, 2004 and June 10, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 317 Winthrop Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the second loan.

Pattern Act 43

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GERALDINE MOSS and GARY S. SHAW, on or about and between January 28, 2004 and June 10, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 317 Winthrop Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Contract of Sale.

Pattern Act 44

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GERALDINE MOSS, GARY S. SHAW and IDA D'ANGELO, on or about and between January 28, 2004 and June 10, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 317 Winthrop Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Mortgage submitted in connection with the first loan.

Pattern Act 45

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GERALDINE MOSS, GARY S. SHAW and IDA D'ANGELO, on or about and between January 28, 2004 and June 10, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located

at 317 Winthrop Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Mortgage submitted in connection with the second loan.

Pattern Act 46

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GERALDINE MOSS, on or about and between on or about and between January 28, 2004 and June 10, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 317 Winthrop Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Uniform Residential Loan Application (Form 1003) submitted in connection with the first loan.

Pattern Act 47

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GERALDINE MOSS, on or about and between January 28, 2004 and June 10, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 317 Winthrop Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Uniform Residential Loan Application (Form 1003) submitted in connection with the second loan.

Pattern Act 48

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and ANDREAS PERDIKOS, on or about and between January 28, 2004 and June 10, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 317 Winthrop Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Appraisal Report submitted in connection with the first loan.

Pattern Act 49

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and ANDREAS PERDIKOS, on or about and between January 28, 2004 and June 10, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 317 Winthrop Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Appraisal Report submitted in connection with the second loan.

As to 508 Jamaica Avenue, Brooklyn, New York

Pattern Act 50

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GARY S. SHAW and IDA D'ANGELO, on or about and between February 26, 2004 and March 11, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 508 Jamaica Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid

and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the first loan.

Pattern Act 51

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GARY S. SHAW, and IDA D'ANGELO, on or about and between February 26, 2004 and March 11, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 508 Jamaica Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the second loan.

Pattern Act 52

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GARY S. SHAW, on or about and between February 26, 2004 and March 11, 2004, in the County of Kings and other

locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 508 Jamaica Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Contract of Sale.

Pattern Act 53

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GARY S. SHAW, and IDA D'ANGELO, on or about and between February 26, 2004 and March 11, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 508 Jamaica Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Mortgage submitted in connection with the first loan.

Pattern Act 54

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GARY S. SHAW, and IDA D'ANGELO, on or about and between February 26, 2004 and March 11, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 508 Jamaica Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Mortgage submitted in connection with the second loan.

Pattern Act 55

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA and MICHAEL SANDELLA, on or about and between February 26, 2004 and March 11, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 508 Jamaica Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Uniform Residential Loan Application (Form 1003) submitted in connection with the first loan.

Pattern Act 56

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA and MICHAEL SANDELLA, on or about and between February 26, 2004 and March 11, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 508 Jamaica Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Uniform Residential Loan Application (Form 1003) submitted in connection with the second loan.

Pattern Act 57

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and ANDREAS PERDIKOS, on or about and between February 26, 2004 and March 11, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 508 Jamaica Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Residential Real Estate Appraisal Report submitted in connection with the first loan.

Pattern Act 58

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and ANDREAS PERDIKOS, on or about and between February 26, 2004 and March 11, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 508 Jamaica Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being an Residential Real Estate Appraisal Report submitted in connection with the second loan.

As to 4116 Avenue J, Brooklyn, New York

Pattern Act 59

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Grand Larceny in the Second Degree [P.L. § 155.40(1)], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, KIM (MOSS) FONTANEZ, GERALDINE MOSS, ANDREAS PERDIKOS, GARY S. SHAW, and IDA D'ANGELO, on or about and between January 22, 2004 and July 17, 2004, in the County of Kings and other locations in the State of New York, while acting in concert with each other and others and pursuant to a

common scheme and plan, relating to real property located at 4116 Avenue J, Brooklyn, New York, stole property having an aggregate value exceeding fifty thousand (\$50,000) dollars, namely, a quantity of United States currency from Credit Suisse First Boston.

Pattern Act 60

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GARY S. SHAW, and IDA D'ANGELO, on or about and between January 22, 2004 and July 17, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 4116 Avenue J, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the first loan.

Pattern Act 61

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GARY S. SHAW, on or about and between January 22, 2004 and July 17, 2004, in the County of Kings and other locations

in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 4116 Avenue J, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Contract of Sale.

Pattern Act 62

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GARY S. SHAW and IDA D'ANGELO, on or about and between January 22, 2004 and July 17, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 4116 Avenue J, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Mortgage submitted in connection with the first loan.

Pattern Act 63

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA and MICHAEL SANDELLA, on or about and between January 22, 2004 and July 17, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 4116 Avenue J, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Uniform Residential Loan Application (Form 1003) submitted in connection with the first loan.

Pattern Act 64

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and ANDREAS PERDIKOS, on or about and between January 22, 2004 and July 17, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 4116 Avenue J, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being an Residential Real Property Appraisal Report submitted in connection with the first loan.

As to 95 East 31st Street, Brooklyn, New York

Pattern Act 65

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Grand Larceny in the Second Degree [P.L. § 155.40(1)], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, KIM (MOSS) FONTANEZ, DANIELLE MOSS, ANDREAS PERDIKOS and GARY S. SHAW, on or about and between January 27, 2004 and May 7, 2004, in the County of Kings and other locations in the State of New York, while acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 95 East 31st Street, Brooklyn, New York, stole property having an aggregate value exceeding fifty thousand (\$50,000) dollars, namely, a quantity of United States currency from Aegis Funding.

Pattern Act 66

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GARY S. SHAW, on or about and between January 27, 2004 and May 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 95 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the first loan.

Pattern Act 67

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GARY S. SHAW, on or about and between January 27, 2004 and May 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 95 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the second loan.

Pattern Act 68

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GARY S. SHAW, on or about and between January 27, 2004 and May 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 95 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission

thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Contract of Sale.

Pattern Act 69

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA and MICHAEL SANDELLA, on or about and between January 27, 2004 and May 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 95 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Uniform Residential Loan Application (Form 1003) submitted in connection with the first loan.

Pattern Act 70

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA and MICHAEL SANDELLA, on or about and between January 27, 2004 and May 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 95 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and

caused a false entry in the business records of an enterprise, that entry being a Uniform Residential Loan Application (Form 1003) submitted in connection with the second loan.

Pattern Act 71

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and ANDREAS PERDIKOS, on or about and between January 27, 2004 and May 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 95 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Appraisal Report submitted in connection with the first loan.

Pattern Act 72

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and ANDREAS PERDIKOS, on or about and between January 27, 2004 and May 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 95 East 31st Street, Brooklyn, New

York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Appraisal Report submitted in connection with the second loan.

Pattern Act 73

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GARY S. SHAW, on or about and between January 27, 2004 and May 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 95 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Mortgage submitted in connection with the first loan.

Pattern Act 74

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GARY S. SHAW, on or about and between January 27, 2004 and May 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common

scheme and plan, relating to real property located at 95 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Mortgage submitted in connection with the second loan.

Pattern Act 75

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendant, LOUIS SANDELLA, on or about and between January 27, 2004 and May 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with others and pursuant to a common scheme and plan, relating to real property located at 95 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a contractor's invoice for repairs submitted in connection with the first loan.

As to 69-31 66th Place, Glendale, New York

Pattern Act 76

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Grand Larceny in the Second Degree [P.L. § 155.40(1)], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, ANDREAS PERDIKOS, GARY S. SHAW, and IDA D'ANGELO, on or about and between March 11, 2004 and July 5, 2004,

in the County of Kings and other locations in the State of New York, while acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 69-31 66th Place, Glendale, New York, stole property having an aggregate value exceeding fifty thousand (\$50,000) dollars, namely, a quantity of United States currency from Accredited Home Lenders.

Pattern Act 77

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GARY S. SHAW and IDA D'ANGELO, on or about and between March 11, 2004 and July 5, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 69-31 66th Place, Glendale, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the first loan.

Pattern Act 78

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GARY S. SHAW, and IDA D'ANGELO, on or about and between March 11, 2004 and July 5, 2004, in the County of Kings and

other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 69-31 66th place, Glendale, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the second loan.

Pattern Act 79

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA and MICHAEL SANDELLA, on or about and between March 11, 2004 and July 5, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 69-31 66th place, Glendale, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Uniform Residential Loan Application (Form 1003) submitted in connection with the first loan.

Pattern Act 80

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA and MICHAEL SANDELLA, on or about and between March 11, 2004 and July 5, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 69-31 66th place, Glendale, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Uniform Residential Loan Application (Form 1003) submitted in connection with the second loan.

Pattern Act 81

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GARY S. SHAW, and IDA D'ANGELO, on or about and between March 11, 2004 and July 5, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 69-31 66th place, Glendale, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Mortgage submitted in connection with the first loan.

Pattern Act 82

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GARY S. SHAW, and IDA D'ANGELO, on or about and between March 11, 2004 and July 5, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 69-31 66th Place, Glendale, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Mortgage submitted in connection with the second loan.

Pattern Act 83

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and ANDREAS PERDIKOS, on or about and between March 11, 2004 and July 5, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 69-31 66th Place, Glendale, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Appraisal Report submitted in connection with the first loan.

Pattern Act 84

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, and GARY S. SHAW, on or about and between March 11, 2004 and July 5, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 69-31 66th Place, Glendale, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Contract of Sale.

As to 1327 Prospect Place, Brooklyn, New York

Pattern Act 85

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Grand Larceny in the Second Degree [P.L. § 155.40(1)], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, DANIELLE MOSS, GERALDINE MOSS, ANDREAS PERDIKOS, GARY S. SHAW and IDA D'ANGELO, on or about and between March 2, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, while acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 1327 Prospect Place, Brooklyn, New York, stole

property having an aggregate value exceeding fifty thousand dollars, namely, a quantity of United States currency from Aegis Funding.

Pattern Act 86

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GERALDINE MOSS, GARY S. SHAW and IDA D'ANGELO, on or about and between March 2, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 1327 Prospect Place, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the first loan.

Pattern Act 87

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, DANIELLE MOSS, GERALDINE MOSS, GARY S. SHAW and IDA D'ANGELO, on or about and between March 2, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, acting

in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 1327 Prospect Place, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the second loan.

Pattern Act 88

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GERALDINE MOSS and GARY S. SHAW, on or about and between March 2, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 1327 Prospect Place, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Contract of Sale.

Pattern Act 89

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GERALDINE MOSS, on or about and between March 2, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 1327 Prospect Place, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Uniform Residential Loan Application (Form 1003) submitted in connection with the first loan.

Pattern Act 90

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GERALDINE MOSS, on or about and between March 2, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 1327 prospect place, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Uniform Residential Loan Application (Form 1003) submitted in connection with the second loan.

Pattern Act 91

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GERALDINE MOSS and ANDREAS PERDIKOS, on or about and between March 2, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 1327 Prospect Place, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Appraisal Report submitted in connection with the first loan.

Pattern Act 92

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GERALDINE MOSS and ANDREAS PERDIKOS, on or about and between March 2, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 1327 Prospect Place, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an

enterprise, that entry being a Real Property Appraisal Report submitted in connection with the second loan.

As to 137 East Riviera Drive, Lindenhurst, New York

Pattern Act 93

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, KIM (MOSS) FONTANEZ, DANIELLE MOSS and IDA D'ANGELO, on or about and between March 22, 2004 and June 21, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 137 East Riviera Drive, Lindenhurst, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the first loan.

Pattern Act 94

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, KIM (MOSS) FONTANEZ, DANIELLE MOSS and IDA D'ANGELO, on or about and between March 22, 2004 and June 21, 2004, in the County of

Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 137 East Riviera Drive, Lindenhurst, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the second loan.

Pattern Act 95

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, KIM (MOSS) FONTANEZ and DANIELLE MOSS, on or about and between March 22, 2004 and June 21, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 137 East Riviera Drive, Lindenhurst, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Residential Real Property Contract of Sale.

Pattern Act 96

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, KIM (MOSS) FONTANEZ, DANIELLE MOSS and IDA D'ANGELO, on or about and between March 22, 2004 and June 21, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 137 East Riviera Drive, Lindenhurst, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Mortgage submitted in connection with the first loan.

Pattern Act 97

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, KIM (MOSS) FONTANEZ, DANIELLE MOSS and IDA D'ANGELO, on or about and between March 22, 2004 and June 21, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 137 East Riviera Drive, Lindenhurst, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Mortgage submitted in connection with the second loan.

Pattern Act 98

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, KIM (MOSS) FONTANEZ and DANIELLE MOSS, on or about and between March 22, 2004 and June 21, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 137 East Riviera Drive, Lindenhurst, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Uniform Residential Loan Application (Form 1003) submitted in connection with the first loan.

Pattern Act 99

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, KIM (MOSS) FONTANEZ and DANIELLE MOSS, on or about and between March 22, 2004 and June 21, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 137 East Riviera Drive, Lindenhurst, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the Business records of an enterprise, that

entry being a Uniform Residential Loan Application (Form 1003) submitted in connection with the second loan.

Pattern Act 100

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, KIM (MOSS) FONTANEZ and DANIELLE MOSS, on or about and between March 22, 2004 and June 21, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 137 East Riviera Drive, Lindenhurst, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Appraisal Report submitted in connection with the first loan.

Pattern Act 101

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, KIM (MOSS) FONTANEZ and DANIELLE MOSS, on or about and between March 22, 2004 and June 21, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 137 East Riviera Drive, Lindenhurst,

New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Appraisal Report submitted in connection with the second loan.

As to 59 Remsen Avenue, Brooklyn, New York

Pattern Act 102

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Grand Larceny in the Second Degree [P.L. § 155.40(1)], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, DANIELLE MOSS, GERALDINE MOSS, ANDREAS PERDIKOS and GARY S. SHAW, on or about and between February 5, 2004 and June 7, 2004, in the County of Kings and other locations in the State of New York, while acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 59 Remsen Avenue, Brooklyn, New York, stole property having an aggregate value exceeding fifty thousand (\$50,000) dollars, namely, a quantity of United States currency from Lend America.

Pattern Act 103

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GERALDINE MOSS and GARY S. SHAW, on or about and between February 5, 2004 and June 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 59 Remsen Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the first loan.

Pattern Act 104

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GERALDINE MOSS and GARY S. SHAW, on or about and between February 5, 2004 and June 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 59 Remsen Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the second loan.

Pattern Act 105

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GERALDINE MOSS and GARY S. SHAW, on or about and between February 5, 2004 and June 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 59 Remsen Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Residential Real Property Contract of Sale.

Pattern Act 106

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GERALDINE MOSS, on or about and between February 5, 2004 and June 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 59 Remsen Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry

being a Uniform Residential Loan Application (Form 1003) submitted in connection with the first loan.

Pattern Act 107

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GERALDINE MOSS, on or about and between February 5, 2004 and June 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 59 Remsen Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the Business records of an enterprise, that entry being a Uniform Residential Loan Application (Form 1003) submitted in connection with the second loan.

Pattern Act 108

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GERALDINE MOSS and ANDREAS PERDIKOS, on or about and between February 5, 2004 and June 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others

and pursuant to a common scheme and plan, relating to real property located at 59 Remsen Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being an Residential Real Property Appraisal Report submitted in connection with the first loan.

Pattern Act 109

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GERALDINE MOSS and ANDREAS PERDIKOS, on or about and between February 5, 2004 and June 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 59 Remsen Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being an Residential Real Property Appraisal Report submitted in connection with the second loan.

Pattern Act 110

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GARY S. SHAW, on or about and between February 5, 2004 and June 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 59 Remsen Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Residential Real Property Mortgage submitted in connection with the first loan.

Pattern Act 111

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GARY S. SHAW, on or about and between February 5, 2004 and June 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 59 Remsen Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Residential Real Property Mortgage submitted in connection with the second loan.

Pattern Act 112

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendant, LOUIS SANDELLA, on or about and between February 5, 2004 and June 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with others and pursuant to a common scheme and plan, relating to real property located at 59 Remsen Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry consisting of a contractor's invoice for repairs submitted in connection with the first loan.

As to 94 East 31st Street, Brooklyn, New York

Pattern Act 113

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Grand Larceny in the Second Degree [P.L. § 155.40(1)], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, KIM (MOSS) FONTANEZ, GERALDINE MOSS, ANDREAS PERDIKOS and GARY S. SHAW, on or about and between February 26, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, while acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 94 East 31st Street, Brooklyn, New York, stole property having an aggregate value exceeding fifty thousand (\$50,000) dollars, namely, a quantity of United States currency from Lend America.

Pattern Act 114

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GARY S. SHAW, on or about and between February 26, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 94 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the first loan.

Pattern Act 115

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GARY S. SHAW, on or about and between February 26, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 94 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission

thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the second loan.

Pattern Act 116

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GARY S. SHAW, on or about and between February 26, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 94 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Contract of Sale.

Pattern Act 117

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA and MICHAEL SANDELLA, on or about and between February 26, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New

York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 94 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Uniform Residential Loan Application (Form 1003) submitted in connection with the first loan.

Pattern Act 118

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA and MICHAEL SANDELLA, on or about and between February 26, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 94 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Uniform Residential Loan Application (Form 1003) submitted in connection with the second loan.

Pattern Act 119

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and ANDREAS PERDIKOS, on or about and between February 26, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 94 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Appraisal Report submitted in connection with the first loan.

Pattern Act 120

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and ANDREAS PERDIKOS, on or about and between February 26, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 94 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Appraisal Report submitted in connection with the second loan.

Pattern Act 121

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GARY S. SHAW, on or about and between February 26, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 94 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Mortgage submitted in connection with the first loan.

Pattern Act 122

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GARY S. SHAW, on or about and between February 26, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 94 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Mortgage submitted in connection with the second loan.

As to 258 Jefferson Avenue, Brooklyn, New York

Pattern Act 123

The Grand Jury of the County of Kings by this indictment accuses the defendant of the crime of Attempted Grand Larceny in the Second Degree [P.L. § 110/155.40(1)], committed as follows:

The defendants, LOUIS SANDELLA, KIM (MOSS) FONTANEZ, GERALDINE MOSS, ANDREAS PERDIKOS and IDA D'ANGELO, on or about and between December 1, 2003 and June 25, 2004, in the County of Kings and other locations in the State of New York, while acting in concert with others and pursuant to a common scheme and plan, relating to real property located at 258 Jefferson Avenue, Brooklyn, New York, attempted to steal property having an aggregate value exceeding fifty thousand (\$50,000) dollars, namely, a quantity of United States currency from BNC Bank.

Pattern Act 124

The Grand Jury of the County of Kings by this indictment accuses the defendant of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, KIM (MOSS) FONTANEZ and IDA D'ANGELO, on or about and between December 1,2003 and June 25, 2004, in the County of Kings and other locations in the State of New York, acting in concert with others and pursuant to a common scheme and plan, relating to real property located at 258 Jefferson Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being an Escrow Letter.

Pattern Act 125

The Grand Jury of the County of Kings by this indictment accuses the defendant of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA and GERALDINE MOSS, on or about and between December 1,2003 and June 25, 2004, in the County of Kings and other locations in the State of New York, acting in concert with others and pursuant to a common scheme and plan, relating to real property located at 258 Jefferson Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Contract of Sale.

Pattern Act 126

The Grand Jury of the County of Kings by this indictment accuses the defendant of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA and GERALDINE MOSS, on or about and between December 1, 2003 and June 25, 2004, in the County of Kings and other locations in the State of New York, acting in concert with others and pursuant to a common scheme and plan, relating to real property located at 258 Jefferson Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Uniform Residential Loan Application (Form 1003) submitted in connection with the first loan.

Pattern Act 127

The Grand Jury of the County of Kings by this indictment accuses the defendant of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA and ANDREAS PERDIKOS, on or about and between December 1, 2003 and June 25, 2004, in the County of Kings and other locations in the State of New York, acting in concert with others and pursuant to a common scheme and plan, relating to real property located at 258 Jefferson Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Appraisal Report submitted in connection with the first loan.

COUNT TWO

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, KIM (MOSS) FONTANEZ, DANIELLE MOSS, GERALDINE MOSS, ANDREAS PERDIKOS, GARY S. SHAW and IDA D'ANGELO, committed the crime of SCHEME TO DEFRAUD IN THE FIRST DEGREE, in violation of Penal Law §190.65(1)(b), as follows:

The defendants, on or about and between October 29, 2001 and August 26, 2004, in the County of Kings and other locations in the State of New York, while acting in concert with each other and others known and unknown to the Grand Jury, 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 thereby obtained property, consisting of United States currency and real estate, valued in excess of \$1,000 Dollars, from more than one such person.

COUNT THREE

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, KIM (MOSS) FONTANEZ, DANIELLE MOSS, GERALDINE MOSS, ANDREAS PERDIKOS, GARY S. SHAW, and IDA D'ANGELO, committed the crime of GRAND LARCENY IN THE FIRST DEGREE, in violation of Penal Law §155.42, as follows:

The defendants, on or about and between December 4, 2003 and May 28, 2004, in the County of Kings and other locations in the State of New York, while acting in concert with each other and others, and pursuant to a common scheme and plan, stole property, consisting of a quantity of United States currency in excess of one million (\$1,000,000) dollars, from Aegis Funding Corp.

As to 753 Marcy Avenue, Brooklyn, New York

COUNT FOUR

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA and IDA D'ANGELO on or about and between October 29, 2001 and June 22, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 753 Marcy Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the first loan.

COUNT FIVE

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First degree [P.L. § 175.10], committed as follows:

The defendant, LOUIS SANDELLA, on or about and between October 29, 2001 and June 22, 2004, in the County of Kings and other locations in the State of New York, acting in concert with others and pursuant to a common scheme and plan, relating to real property located at 753 Marcy Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Contract of Sale.

COUNT SIX

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA AND IDA D'ANGELO, on or about and between October 29, 2001 and June 22, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 753 Marcy Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Mortgage submitted in connection with the first loan.

COUNT SEVEN

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendant, LOUIS SANDELLA, on or about and between October 29, 2001 and June 22, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 753 Marcy Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Uniform Residential Loan Application (Form 1003) submitted in connection with the first loan.

COUNT EIGHT

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA AND ANDREAS PERDIKOS, on or about and between October 29, 2001 and June 22, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 753 Marcy Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Appraisal Report submitted in connection with the first loan.

As to 756 Marcy Avenue, Brooklyn, New York

COUNT NINE

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA and IDA D'ANGELO, on or about and between October 29, 2001 and June 22, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 756 Marcy Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the first loan.

COUNT TEN

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendant, LOUIS SANDELLA, on or about and between October 29, 2001 and June 22, 2004, in the County of Kings and other locations in the State of New York, acting in concert with others and pursuant to a common scheme and plan, relating to real property located at 756 Marcy Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, namely, a Real Property Contract of Sale.

COUNT ELEVEN

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA and IDA D'ANGELO, on or about and between October 29, 2001 and June 22, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 756 Marcy Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Mortgage submitted in connection with the first loan.

COUNT TWELVE

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendant, LOUIS SANDELLA, on or about and between October 29, 2001 and June 22, 2004, in the County of Kings and other locations in the State of New York, acting in concert with others and pursuant to a common scheme and plan, relating to real property located at 756 Marcy Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Uniform Residential Loan Application (Form 1003) submitted in connection with the first loan.

COUNT THIRTEEN

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA AND ANDREAS PERDIKOS, on or about and between October 29, 2001 and June 22, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 756 Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Appraisal Report submitted in connection with the first loan.

As to 317 Winthrop Street, Brooklyn, New York

COUNT FOURTEEN

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Grand Larceny in the Second Degree [P.L. § 155.40(1)], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, KIM (MOSS) FONTANEZ, DANIELLE MOSS, GERALDINE MOSS, ANDREAS PERDIKOS, GARY S. SHAW, and IDA D'ANGELO, on or about and between January 28, 2004 and June 10, 2004, in the County of Kings and other locations in the State of New York, while acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 317 Winthrop Street,

Brooklyn, New York, stole property having an aggregate value exceeding fifty thousand (\$50,000) dollars, namely, a quantity of United States currency from Aegis Funding.

COUNT FIFTEEN

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GERALDINE MOSS, GARY S. SHAW, and IDA D'ANGELO, on or about and between January 28, 2004 and June 10, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 317 Winthrop Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the first loan.

COUNT SIXTEEN

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GERALDINE MOSS, GARY S. SHAW, and IDA D'ANGELO, on or about and between January 28, 2004 and June 10,

2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 317 Winthrop Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the second loan.

COUNT SEVENTEEN

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GERALDINE MOSS, and GARY S. SHAW, on or about and between January 28, 2004 and June 10, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 317 Winthrop Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Contract of Sale.

COUNT EIGHTEEN

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GERALDINE MOSS, GARY S. SHAW, and IDA D'ANGELO, on or about and between January 28, 2004 and June 10, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 317 Winthrop Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Mortgage submitted in connection with the first loan.

COUNT NINETEEN

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GERALDINE MOSS, GARY S. SHAW, and IDA D'ANGELO, on or about and between January 28, 2004 and June 10, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 317 Winthrop Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Mortgage submitted in connection with the second loan.

COUNT TWENTY

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, and GERALDINE MOSS, on or about and between on or about and between January 28, 2004 and June 10, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 317 Winthrop Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Uniform Residential Loan Application (Form 1003) submitted in connection with the first loan.

COUNT TWENTY-ONE

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GERALDINE MOSS, on or about and between January 28, 2004 and June 10, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 317 Winthrop Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry

being a Uniform Residential Loan Application (Form 1003) submitted in connection with the second loan.

COUNT TWENTY-TWO

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, and ANDREAS PERDIKOS, on or about and between January 28, 2004 and June 10, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 317 Winthrop Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Appraisal Report submitted in connection with the first loan.

COUNT TWENTY-THREE

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, and ANDREAS PERDIKOS, on or about and between January 28, 2004 and June 10, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and

pursuant to a common scheme and plan, relating to real property located at 317 Winthrop Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Appraisal Report submitted in connection with the second loan.

As to 508 Jamaica Avenue, Brooklyn, New York

COUNT TWENTY-FOUR

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GARY S. SHAW, and IDA D'ANGELO, on or about and between February 26, 2004 and March 11, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 508 Jamaica Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the first loan.

COUNT TWENTY-FIVE

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GARY S. SHAW, and IDA D'ANGELO, on or about and between February 26, 2004 and March 11, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 508 Jamaica Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the second loan.

COUNT TWENTY-SIX

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GARY S. SHAW, on or about and between February 26, 2004 and March 11, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 508 Jamaica Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Contract of Sale.

COUNT TWENTY-SEVEN

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GARY S. SHAW, and IDA D'ANGELO, on or about and between February 26, 2004 and March 11, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 508 Jamaica Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Mortgage submitted in connection with the first loan.

COUNT TWENTY-EIGHT

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GARY S. SHAW, and IDA D'ANGELO, on or about and between February 26, 2004 and March 11, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 508 Jamaica Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid

and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Mortgage submitted in connection with the second loan.

COUNT TWENTY-NINE

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA and MICHAEL SANDELLA, on or about and between February 26, 2004 and March 11, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 508 Jamaica Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Uniform Residential Loan Application (Form 1003) submitted in connection with the first loan.

COUNT THIRTY

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA and MICHAEL SANDELLA, on or about and between February 26, 2004 and March 11, 2004, in the County of Kings and other locations in the State of

New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 508 Jamaica Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Uniform Residential Loan Application (Form 1003) submitted in connection with the second loan.

COUNT THIRTY-ONE

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and ANDREAS PERDIKOS, on or about and between February 26, 2004 and March 11, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 508 Jamaica Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Residential Real Estate Appraisal Report submitted in connection with the first loan.

COUNT THIRTY-TWO

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and ANDREAS PERDIKOS, on or about and between February 26, 2004 and March 11, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 508 Jamaica Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being an Residential Real Estate Appraisal Report submitted in connection with the second loan.

As to 4116 Avenue J, Brooklyn, New York

COUNT THIRTY- THREE

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Grand Larceny in the Second Degree [P.L. § 155.40(1)], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, KIM (MOSS) FONTANEZ, GERALDINE MOSS, ANDREAS PERDIKOS, GARY S. SHAW, and IDA D'ANGELO, on or about and between January 22, 2004 and July 17, 2004, in the County of Kings and other locations in the State of New York, while acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 4116 Avenue J, Brooklyn, New York, stole property having an aggregate value exceeding fifty thousand (\$50,000) dollars, namely, a quantity of United States currency from Credit Suisse First Boston.

COUNT THIRTY- FOUR

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GARY S. SHAW, and IDA D'ANGELO, on or about and between January 22, 2004 and July 17, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 4116 Avenue J, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the first loan.

COUNT THIRTY-FIVE

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GARY S. SHAW, on or about and between January 22, 2004 and July 17, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 4116 Avenue J, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission

thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Contract of Sale.

COUNT THIRTY- SIX

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GARY S. SHAW and IDA D'ANGELO, on or about and between January 22, 2004 and July 17, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 4116 Avenue J, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Mortgage submitted in connection with the first loan.

COUNT THIRTY-SEVEN

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA and MICHAEL SANDELLA, on or about and between January 22, 2004 and July 17, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 4116 Avenue J, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and

caused a false entry in the business records of an enterprise, that entry being a Uniform Residential Loan Application (Form 1003) submitted in connection with the first loan.

COUNT THIRTY-EIGHT

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and ANDREAS PERDIKOS, on or about and between January 22, 2004 and July 17, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 4116 Avenue J, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being an Residential Real Property Appraisal Report submitted in connection with the first loan.

As to 95 East 31st Street, Brooklyn, New York

COUNT THIRTY-NINE

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Grand Larceny in the Second Degree [P.L. § 155.40(1)], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, KIM (MOSS) FONTANEZ, DANIELLE MOSS, ANDREAS PERDIKOS and GARY S. SHAW, on or about and between January 27, 2004 and May 7, 2004, in the County of Kings and other locations in the State of New York, while acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 95 East 31st Street, Brooklyn, New York, stole property having an aggregate value exceeding fifty thousand (\$50,000) dollars, namely, a quantity of United States currency from Aegis Funding.

COUNT FORTY

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GARY S. SHAW, on or about and between January 27, 2004 and May 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 95 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the first loan.

COUNT FORTY- ONE

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GARY S. SHAW, on or about and between January 27, 2004 and May 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 95 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the second loan.

COUNT FORTY-TWO

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GARY S. SHAW, on or about and between January 27, 2004 and May 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 95 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Contract of Sale.

COUNT FORTY-THREE

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA and MICHAEL SANDELLA, on or about and between January 27, 2004 and May 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 95 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Uniform Residential Loan Application (Form 1003) submitted in connection with the first loan.

COUNT FORTY- FOUR

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA and MICHAEL SANDELLA, on or about and between January 27, 2004 and May 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 95 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and

caused a false entry in the business records of an enterprise, that entry being a Uniform Residential Loan Application (Form 1003) submitted in connection with the second loan.

COUNT FORTY- FIVE

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and ANDREAS PERDIKOS, on or about and between January 27, 2004 and May 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 95 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Appraisal Report submitted in connection with the first loan.

COUNT FORTY- SIX

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and ANDREAS PERDIKOS, on or about and between January 27, 2004 and May 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 95 East 31st Street, Brooklyn, New

York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Appraisal Report submitted in connection with the second loan.

COUNT FORTY-SEVEN

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GARY S. SHAW, on or about and between January 27, 2004 and May 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 95 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Mortgage submitted in connection with the first loan.

COUNT FORTY-EIGHT

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GARY S. SHAW, on or about and between January 27, 2004 and May 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common

scheme and plan, relating to real property located at 95 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Mortgage submitted in connection with the second loan.

COUNT FORTY-NINE

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendant, LOUIS SANDELLA, on or about and between January 27, 2004 and May 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with others and pursuant to a common scheme and plan, relating to real property located at 95 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a contractor's invoice for repairs submitted in connection with the first loan.

As to 1327 Prospect Place, Brooklyn, New York

COUNT FIFTY

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Grand Larceny in the Second Degree [P.L. § 155.40(1)], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, DANIELLE MOSS, GERALDINE MOSS, ANDREAS PERDIKOS, GARY S. SHAW and IDA D'ANGELO, on or about and between March 2, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, while acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 1327 Prospect Place, Brooklyn, New York, stole property having an aggregate value exceeding fifty thousand dollars, namely, a quantity of United States currency from Aegis Funding.

COUNT FIFTY-ONE

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GERALDINE MOSS, GARY S. SHAW and IDA D'ANGELO, on or about and between March 2, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 1327 Prospect Place, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the first loan.

COUNT FIFTY-TWO

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, DANIELLE MOSS, GERALDINE MOSS, GARY S. SHAW and IDA D'ANGELO, on or about and between March 2, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 1327 Prospect Place, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the second loan.

COUNT FIFTY-THREE

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GERALDINE MOSS and GARY S. SHAW, on or about and between March 2, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 1327 Prospect Place, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid

and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Contract of Sale.

COUNT FIFTY-FOUR

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GERALDINE MOSS, on or about and between March 2, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 1327 Prospect Place, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Uniform Residential Loan Application (Form 1003) submitted in connection with the first loan.

COUNT FIFTY-FIVE

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GERALDINE MOSS, on or about and between March 2, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common

scheme and plan, relating to real property located at 1327 prospect place, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Uniform Residential Loan Application (Form 1003) submitted in connection with the second loan.

COUNT FIFTY-SIX

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GERALDINE MOSS and ANDREAS PERDIKOS, on or about and between March 2, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 1327 Prospect Place, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Appraisal Report submitted in connection with the first loan.

COUNT FIFTY-SEVEN

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GERALDINE MOSS and ANDREAS PERDIKOS, on or about and between March 2, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 1327 Prospect Place, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Appraisal Report submitted in connection with the second loan.

As to 59 Remsen Street, Brooklyn, New York

COUNT FIFTY-EIGHT

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Grand Larceny in the Second Degree [P.L. § 155.40(1)], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, DANIELLE MOSS, GERALDINE MOSS, ANDREAS PERDIKOS and GARY S. SHAW, on or about and between February 5, 2004 and June 7, 2004, in the County of Kings and other locations in the State of New York, while acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 59 Remsen Avenue, Brooklyn, New York, stole property having an aggregate value exceeding fifty thousand (\$50,000) dollars, namely, a quantity of United States currency from Lend America.

COUNT FIFTY-NINE

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GERALDINE MOSS and GARY S. SHAW, on or about and between February 5, 2004 and June 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 59 Remsen Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the first loan.

COUNT SIXTY

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GERALDINE MOSS and GARY S. SHAW, on or about and between February 5, 2004 and June 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 59 Remsen Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the second loan.

COUNT SIXTY-ONE

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GERALDINE MOSS and GARY S. SHAW, on or about and between February 5, 2004 and June 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 59 Remsen Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Residential Real Property Contract of Sale.

COUNT SIXTY-TWO

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GERALDINE MOSS, on or about and between February 5, 2004 and June 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 59 Remsen Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Uniform Residential Loan Application (Form 1003) submitted in connection with the first loan.

COUNT SIXTY-THREE

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GERALDINE MOSS, on or about and between February 5, 2004 and June 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 59 Remsen Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the Business records of an enterprise, that entry

being a Uniform Residential Loan Application (Form 1003) submitted in connection with the second loan.

COUNT SIXTY-FOUR

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GERALDINE MOSS and ANDREAS PERDIKOS, on or about and between February 5, 2004 and June 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 59 Remsen Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being an Residential Real Property Appraisal Report submitted in connection with the first loan.

COUNT SIXTY-FIVE

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, GERALDINE MOSS and ANDREAS PERDIKOS, on or about and between February 5, 2004 and June 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others

and pursuant to a common scheme and plan, relating to real property located at 59 Remsen Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being an Residential Real Property Appraisal Report submitted in connection with the second loan.

COUNT SIXTY-SIX

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GARY S. SHAW, on or about and between February 5, 2004 and June 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 59 Remsen Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Residential Real Property Mortgage submitted in connection with the first loan.

COUNT SIXTY-SEVEN

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GARY S. SHAW, on or about and between February 5, 2004 and June 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 59 Remsen Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Residential Real Property Mortgage submitted in connection with the second loan.

COUNT SIXTY-EIGHT

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendant, LOUIS SANDELLA, on or about and between February 5, 2004 and June 7, 2004, in the County of Kings and other locations in the State of New York, acting in concert with others and pursuant to a common scheme and plan, relating to real property located at 59 Remsen Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry consisting of a contractor's invoice for repairs submitted in connection with the first loan.

As to 94 East 31st Street, Brooklyn, New York

COUNT SIXTY-NINE

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Grand Larceny in the Second Degree [P.L. § 155.40(1)], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA, KIM (MOSS) FONTANEZ, GERALDINE MOSS, ANDREAS PERDIKOS and GARY S. SHAW, on or about and between February 26, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, while acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 94 East 31st Street, Brooklyn, New York, stole property having an aggregate value exceeding fifty thousand (\$50,000) dollars, namely, a quantity of United States currency from Lend America.

COUNT SEVENTY

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GARY S. SHAW, on or about and between February 26, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 94 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission

thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the first loan.

COUNT SEVENTY-ONE

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GARY S. SHAW, on or about and between February 26, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 94 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a HUD-1 closing or settlement statement submitted in connection with the second loan.

COUNT SEVENTY-TWO

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GARY S. SHAW, on or about and between February 26, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 94 East 31st Street, Brooklyn, New York, with

intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Contract of Sale.

COUNT SEVENTY-THREE

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA and MICHAEL SANDELLA, on or about and between February 26, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 94 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Uniform Residential Loan Application (Form 1003) submitted in connection with the first loan.

COUNT SEVENTY-FOUR

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA and MICHAEL SANDELLA, on or about and between February 26, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan,

relating to real property located at 94 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Uniform Residential Loan Application (Form 1003) submitted in connection with the second loan.

COUNT SEVENTY-FIVE

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and ANDREAS PERDIKOS, on or about and between February 26, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 94 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Appraisal Report submitted in connection with the first loan.

COUNT SEVENTY-SIX

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and ANDREAS PERDIKOS, on or about and between February 26, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 94 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Appraisal Report submitted in connection with the second loan.

COUNT SEVENTY-SEVEN

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GARY S. SHAW, on or about and between February 26, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 94 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Mortgage submitted in connection with the first loan.

COUNT SEVENTY-EIGHT

The Grand Jury of the County of Kings by this indictment accuses the defendants of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA, MICHAEL SANDELLA and GARY S. SHAW, on or about and between February 26, 2004 and July 8, 2004, in the County of Kings and other locations in the State of New York, acting in concert with each other and others and pursuant to a common scheme and plan, relating to real property located at 94 East 31st Street, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Mortgage submitted in connection with the second loan.

As to 258 Jefferson Avenue, Brooklyn, New York

COUNT SEVENY-NINE

The Grand Jury of the County of Kings by this indictment accuses the defendant of the crime of Attempted Grand Larceny in the Second Degree [P.L. § 110/155.40(1)], committed as follows:

The defendants, LOUIS SANDELLA, KIM (MOSS) FONTANEZ, GERALDINE MOSS, ANDREAS PERDIKOS and IDA D'ANGELO, on or about and between December 1, 2003 and June 25, 2004, in the County of Kings and other locations in the State of New York, while acting in concert with others and pursuant to a common scheme and plan, relating to real property located at 258 Jefferson Avenue, Brooklyn, New York, attempted to steal property having an aggregate value exceeding fifty thousand (\$50,000) dollars, namely, a quantity of United States currency from BNC Bank.

COUNT EIGHTY

The Grand Jury of the County of Kings by this indictment accuses the defendant of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA, KIM (MOSS) FONTANEZ and IDA D'ANGELO, on or about and between December 1, 2003 and June 25, 2004, in the County of Kings and other locations in the State of New York, acting in concert with others and pursuant to a common scheme and plan, relating to real property located at 258 Jefferson Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being an Escrow Letter.

COUNT EIGHTY-ONE

The Grand Jury of the County of Kings by this indictment accuses the defendant of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA and GERALDINE MOSS, on or about and between December 1, 2003 and June 25, 2004, in the County of Kings and other locations in the State of New York, acting in concert with others and pursuant to a common scheme and plan, relating to real property located at 258 Jefferson Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Real Property Contract of Sale.

COUNT EIGHTY-TWO

The Grand Jury of the County of Kings by this indictment accuses the defendant of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10], committed as follows:

The defendants, LOUIS SANDELLA and GERALDINE MOSS, on or about and between December 1, 2003 and June 25, 2004, in the County of Kings and other locations in the State of New York, acting in concert with others and pursuant to a common scheme and plan, relating to real property located at 258 Jefferson Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false entry in the business records of an enterprise, that entry being a Uniform Residential Loan Application (Form 1003).

COUNT EIGHTY-THREE

The Grand Jury of the County of Kings by this indictment accuses the defendant of the crime of Falsifying Business Records in the First Degree [P.L. § 175.10] committed as follows:

The defendants, LOUIS SANDELLA and ANDREAS PERDIKOS, on or about and between December 1, 2003 and June 25, 2004, in the County of Kings and other locations in the State of New York, acting in concert with others and pursuant to a common scheme and plan, relating to real property located at 258 Jefferson Avenue, Brooklyn, New York, with intent to defraud, including an intent to commit another crime and aid and conceal the commission thereof, made and caused a false

entry in the business records of an enterprise, that entry being a Real Property Appraisal Report.

J. CHRISTOPHER PRATHER
Deputy Attorney General-in-Charge
New York State Organized Crime Task Force

By: _____
Sean Courtney
Assistant Deputy Attorney General

Dated: April 20, 2006
Brooklyn, New York

A TRUE BILL

Acting Foreperson of the Grand Jury