

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

THE PEOPLE OF THE STATE OF NEW YORK

-against-

JEFF EZULIKE

Defendant,

FILED:
INDICTMENT NO. 891/2021

PL 175.35(1) OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE (4 Counts)

A TRUE BILL


FOREMAN

ATTORNEY GENERAL

COUNT ONE

THE GRAND JURY, by this indictment, accuses the defendant, JEFF EZULIKE of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law §175.35(1) committed as follows:

Defendant JEFF EZULIKE, between on or about May 10, 2018, in the county of Queens and elsewhere, knowing that a written instrument, a New York City Department of Environmental Protection Inspection Report for a premise at 47-52 196th Place, Queens, New York, on April 25, 2018, contained a false statement or false information, and with intent to defraud the state or any political subdivision, public authority or public benefit corporation of the state, he offered or presented it to a public office, public servant, public authority, or public benefit corporation, with the knowledge or belief that it would be filed with, registered or recorded in or otherwise become a part of the records of such public office, public servant, public authority or public benefit corporation, to wit the New York City Department of Environmental Protection located at 59-17 Junction Boulevard, Queens, New York.

COUNT TWO

THE GRAND JURY, by this indictment, accuses the defendant, JEFF EZULIKE of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law §175.35(1) committed as follows:

Defendant JEFF EZULIKE, between on or about May 21, 2018, in the county of Queens and elsewhere, knowing that a written instrument, a New York City Department of Environmental Protection Inspection Report for a premise at 144-10 105th Avenue, Queens, New York, on May 19, 2018, contained a false statement or false information, and with intent to defraud the state or any political subdivision, public authority or public

benefit corporation of the state, he offered or presented it to a public office, public servant, public authority, or public benefit corporation, with the knowledge or belief that it would be filed with, registered or recorded in or otherwise become a part of the records of such public office, public servant, public authority or public benefit corporation, to wit the New York City Department of Environmental Protection located at 59-17 Junction Boulevard, Queens, New York.

COUNT THREE

THE GRAND JURY, by this indictment, accuses the defendant, JEFF EZULIKE of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law §175.35(1) committed as follows:

Defendant JEFF EZULIKE, between on or about July 9, 2019, in the county of Kings and elsewhere, knowing that a written instrument, a New York City Department of Environmental Protection Inspection Report for a premise at 557 Lexington Avenue, Brooklyn, New York, on July 3, 2019, contained a false statement or false information, and with intent to defraud the state or any political subdivision, public authority or public benefit corporation of the state, he offered or presented it to a public office, public servant, public authority, or public benefit corporation, with the knowledge or belief that it would be filed with, registered or recorded in or otherwise become a part of the records of such public office, public servant, public authority or public benefit corporation, to wit the New York City Department of Environmental Protection located at 59-17 Junction Boulevard, Queens, New York.

COUNT FOUR

THE GRAND JURY, by this indictment, accuses the defendant, JEFF EZULIKE of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law §175.35(1) committed as follows:

Defendant JEFF EZULIKE, between on or about July 9, 2019, in the county of Queens and elsewhere, knowing that a written instrument, a New York City Department of Environmental Protection Inspection Report for a premise at 103-24 126th Street, Queens, New York, on July 5, 2019, contained a false statement or false information, and with intent to defraud the state or any political subdivision, public authority or public benefit corporation of the state, he offered or presented it to a public office, public servant, public authority, or public benefit corporation, with the knowledge or belief that it would be filed with, registered or recorded in or otherwise become a part of the records of such public office, public servant, public authority or public benefit corporation, to wit the New York City Department of Environmental Protection located at 59-17 Junction Boulevard, Queens, New York.

LETITIA JAMES
ATTORNEY GENERAL

BY:


AAG RUSSELL SATIN

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

THE PEOPLE OF THE STATE OF NEW YORK

-against-

KOSTA KAMBERIS

Defendant,

FILED:
INDICTMENT NO. 893/2021

PL 175.35(1) OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE (4 Counts)

A TRUE BILL


FOREMAN

ATTORNEY GENERAL

COUNT ONE

THE GRAND JURY, by this indictment, accuses the defendant, KOSTA KAMBERIS of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law §175.35(1) committed as follows:

Defendant KOSTA KAMBERIS, between on or about May 10, 2018, in the county of New York and elsewhere, knowing that a written instrument, a New York City Department of Environmental Protection Inspection Report for a premise at 2 Sutton Place South, Manhattan, New York, on April 20, 2018, contained a false statement or false information, and with intent to defraud the state or any political subdivision, public authority or public benefit corporation of the state, he offered or presented it to a public office, public servant, public authority, or public benefit corporation, with the knowledge or belief that it would be filed with, registered or recorded in or otherwise become a part of the records of such public office, public servant, public authority or public benefit corporation, to wit the New York City Department of Environmental Protection located at 59-17 Junction Boulevard, Queens, New York.

COUNT TWO

THE GRAND JURY, by this indictment, accuses the defendant, KOSTA KAMBERIS of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law §175.35(1) committed as follows:

Defendant KOSTA KAMBERIS, between on or about June 14, 2018, in the county of New York and elsewhere, knowing that a written instrument, a New York City Department of Environmental Protection Inspection Report for a premise at 248 West 108th Street, Manhattan, New York, on April 19, 2018, contained a false statement or false information, and with intent to defraud the state or any political subdivision, public authority or public benefit corporation of the state, he offered or presented it to a public office, public servant,

public authority, or public benefit corporation, with the knowledge or belief that it would be filed with, registered or recorded in or otherwise become a part of the records of such public office, public servant, public authority or public benefit corporation, to wit the New York City Department of Environmental Protection located at 59-17 Junction Boulevard, Queens, New York.

COUNT THREE

THE GRAND JURY, by this indictment, accuses the defendant, KOSTA KAMBERIS of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law §175.35(1) committed as follows:

Defendant KOSTA KAMBERIS, between on or about September 21, 2018, in the county of Kings and elsewhere, knowing that a written instrument, a New York City Department of Environmental Protection Inspection Report for a premise at 1723 73rd Street, Brooklyn, New York, on August 21, 2018, contained a false statement or false information, and with intent to defraud the state or any political subdivision, public authority or public benefit corporation of the state, he offered or presented it to a public office, public servant, public authority, or public benefit corporation, with the knowledge or belief that it would be filed with, registered or recorded in or otherwise become a part of the records of such public office, public servant, public authority or public benefit corporation, to wit the New York City Department of Environmental Protection located at 59-17 Junction Boulevard, Queens, New York.

COUNT FOUR

THE GRAND JURY, by this indictment, accuses the defendant, KOSTA KAMBERIS of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law §175.35(1) committed as follows:

Defendant KOSTA KAMBERIS, between on or about November 13, 2018, in the county of Queens and elsewhere, knowing that a written instrument, a New York City Department of Environmental Protection Inspection Report for a premise at 90-31 176 Street, Queens, New York, on August 15, 2018, contained a false statement or false information, and with intent to defraud the state or any political subdivision, public authority or public benefit corporation of the state, he offered or presented it to a public office, public servant, public authority, or public benefit corporation, with the knowledge or belief that it would be filed with, registered or recorded in or otherwise become a part of the records of such public office, public servant, public authority or public benefit corporation, to wit the New York City Department of Environmental Protection located at 59-17 Junction Boulevard, Queens, New York.

LETITIA JAMES
ATTORNEY GENERAL

BY:


AAG RUSSELL SATIN

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

THE PEOPLE OF THE STATE OF NEW YORK

-against-

RUSSELL GOSS

Defendant,

| FILED:
| INDICTMENT NO. 892/2021
|

PL 175.35(1) OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE (Six Counts)

A TRUE BILL


FOREMAN

ATTORNEY GENERAL

COUNT ONE

THE GRAND JURY, by this indictment, accuses the defendant, RUSSELL GOSS of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law §175.35(1) committed as follows:

Defendant RUSSELL GOSS, between on or about January 31, 2018, in the county of Staten Island and elsewhere, knowing that a written instrument, a New York City Department of Environmental Protection Inspection Report for a premise at 378 Alter Avenue, Staten Island, New York, on January 30, 2018, contained a false statement or false information, and with intent to defraud the state or any political subdivision, public authority or public benefit corporation of the state, he offered or presented it to a public office, public servant, public authority, or public benefit corporation, with the knowledge or belief that it would be filed with, registered or recorded in or otherwise become a part of the records of such public office, public servant, public authority or public benefit corporation, to wit the New York City Department of Environmental Protection located at 59-17 Junction Boulevard, Queens, New York.

COUNT TWO

THE GRAND JURY, by this indictment, accuses the defendant, RUSSELL GOSS of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law §175.35(1) committed as follows:

Defendant RUSSELL GOSS, between on or about January 3, 2019, in the county of the Bronx and elsewhere, knowing that a written instrument, a New York City Department of Environmental Protection Inspection Report for a premise at 2018 Monterey Avenue, Bronx, New York, on December 21, 2018, contained a false statement or false information, and with intent to defraud the state or any political subdivision, public authority or public benefit corporation of the state, he offered or presented it to a public office, public

servant, public authority, or public benefit corporation, with the knowledge or belief that it would be filed with, registered or recorded in or otherwise become a part of the records of such public office, public servant, public authority or public benefit corporation, to wit the New York City Department of Environmental Protection located at 59-17 Junction Boulevard, Queens, New York.

COUNT THREE

THE GRAND JURY, by this indictment, accuses the defendant, RUSSELL GOSS of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law §175.35(1) committed as follows:

Defendant RUSSELL GOSS, between on or about January 7, 2019, in the county of the Bronx and elsewhere, knowing that a written instrument, a New York City Department of Environmental Protection Inspection Report for a premise at 144-03 228th Street, Queens, New York, on January 2, 2019, contained a false statement or false information, and with intent to defraud the state or any political subdivision, public authority or public benefit corporation of the state, he offered or presented it to a public office, public servant, public authority, or public benefit corporation, with the knowledge or belief that it would be filed with, registered or recorded in or otherwise become a part of the records of such public office, public servant, public authority or public benefit corporation, to wit the New York City Department of Environmental Protection located at 59-17 Junction Boulevard, Queens, New York.

COUNT FOUR

THE GRAND JURY, by this indictment, accuses the defendant, RUSSELL GOSS of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law §175.35(1) committed as follows:

Defendant RUSSELL GOSS, between on or about May 13, 2019, in the county of Kings and elsewhere, knowing that a written instrument, a New York City Department of Environmental Protection Inspection Report for a premise at 29 Greene Avenue, Brooklyn, New York, on April 26, 2019, contained a false statement or false information, and with intent to defraud the state or any political subdivision, public authority or public benefit corporation of the state, he offered or presented it to a public office, public servant, public authority, or public benefit corporation, with the knowledge or belief that it would be filed with, registered or recorded in or otherwise become a part of the records of such public office, public servant, public authority or public benefit corporation, to wit the New York City Department of Environmental Protection located at 59-17 Junction Boulevard, Queens, New York.

COUNT FIVE

THE GRAND JURY, by this indictment, accuses the defendant, RUSSELL GOSS of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law §175.35(1) committed as follows:

Defendant RUSSELL GOSS, between on or about October 16, 2019, in the county of Kings and elsewhere, knowing that a written instrument, a New York City Department of Environmental Protection Inspection Report for a premise at 16 Wyckoff Street, Brooklyn, New York, on October 10, 2019, contained a false statement or false information, and with intent to defraud the state or any political subdivision, public authority or public benefit corporation of the state, he offered or presented it to a public office, public servant, public authority, or public benefit corporation, with the knowledge or belief that it would be filed with, registered or recorded in or otherwise become a part of the records of such public office, public servant, public authority or public benefit corporation, to wit the New York City Department of Environmental Protection located at 59-17 Junction Boulevard, Queens, New York.

COUNT SIX

THE GRAND JURY, by this indictment, accuses the defendant, RUSSELL GOSS of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law §175.35(1) committed as follows:

Defendant RUSSELL GOSS, between on or about October 17, 2019, in the county of New York and elsewhere, knowing that a written instrument, a New York City Department of Environmental Protection Inspection Report for a premise at 505 East 79th Street, Manhattan, New York, on October 9, 2019, contained a false statement or false information, and with intent to defraud the state or any political subdivision, public authority or public benefit corporation of the state, he offered or presented it to a public office, public servant, public authority, or public benefit corporation, with the knowledge or belief that it would be filed with, registered or recorded in or otherwise become a part of the records of such public office, public servant, public authority or public benefit corporation, to wit the New York City Department of Environmental Protection located at 59-17 Junction Boulevard, Queens, New York.

LETITIA JAMES
ATTORNEY GENERAL

BY:


AAG RUSSELL SATIN

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

THE PEOPLE OF THE STATE OF NEW YORK

-against-

VALENTINO BUONO

Defendant,

FILED:
INDICTMENT NO. 401/2020

PL 175.35(1) OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE (5 Counts)

A TRUE BILL


FOREMAN

ATTORNEY GENERAL

COUNT ONE

THE GRAND JURY, by this indictment, accuses the defendant, VALENTINO BUONO of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law §175.35(1) committed as follows:

Defendant VALENTINO BUONO, between on or about April 12, 2019, in the county of the Bronx and elsewhere, knowing that a written instrument, a New York City Department of Environmental Protection Inspection Report for a premise at 480 Concord Avenue, Bronx, New York, on April 9, 2019, contained a false statement or false information, and with intent to defraud the state or any political subdivision, public authority or public benefit corporation of the state, he offered or presented it to a public office, public servant, public authority, or public benefit corporation, with the knowledge or belief that it would be filed with, registered or recorded in or otherwise become a part of the records of such public office, public servant, public authority or public benefit corporation, to wit the New York City Department of Environmental Protection located at 59-17 Junction Boulevard, Queens, New York.

COUNT TWO

THE GRAND JURY, by this indictment, accuses the defendant, VALENTINO BUONO of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law §175.35(1) committed as follows:

Defendant VALENTINO BUONO, between on or about April 12, 2019, in the county of New York and elsewhere, knowing that a written instrument, a New York City Department of Environmental Protection Inspection Report for a premise at 740 E. 149th St, Bronx, New York, on April 9, 2019, contained a false statement or false information, and with intent to defraud the state or any political subdivision, public authority

or public benefit corporation of the state, he offered or presented it to a public office, public servant, public authority, or public benefit corporation, with the knowledge or belief that it would be filed with, registered or recorded in or otherwise become a part of the records of such public office, public servant, public authority or public benefit corporation, to wit the New York City Department of Environmental Protection located at 59-17 Junction Boulevard, Queens, New York.

COUNT THREE

THE GRAND JURY, by this indictment, accuses the defendant, VALENTINO BUONO of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law §175.35(1) committed as follows:

Defendant VALENTINO BUONO, between on or about December 24, 2019, in the county of the Bronx and elsewhere, knowing that a written instrument, a New York City Department of Environmental Protection Inspection Report for a premise at 215B Edgewater Park, Bronx, New York, on December 9, 2019, contained a false statement or false information, and with intent to defraud the state or any political subdivision, public authority or public benefit corporation of the state, he offered or presented it to a public office, public servant, public authority, or public benefit corporation, with the knowledge or belief that it would be filed with, registered or recorded in or otherwise become a part of the records of such public office, public servant, public authority or public benefit corporation to wit the New York City Department of Environmental Protection located at 59-17 Junction Boulevard, Queens, New York.

COUNT FOUR

THE GRAND JURY, by this indictment, accuses the defendant, VALENTINO BUONO of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law §175.35(1) committed as follows:

Defendant VALENTINO BUONO, between on or about December 31, 2019, in the county of New York and elsewhere, knowing that a written instrument, a New York City Department of Environmental Protection Inspection Report for a premise at 2110 7th Avenue, Manhattan, New York, on December 11, 2019, contained a false statement or false information, and with intent to defraud the state or any political subdivision, public authority or public benefit corporation of the state, he offered or presented it to a public office, public servant, public authority, or public benefit corporation, with the knowledge or belief that it would be filed with, registered or recorded in or otherwise become a part of the records of such public office, public servant, public authority or public benefit corporation, to wit the New York City Department of Environmental Protection located at 59-17 Junction Boulevard, Queens, New York.

COUNT FIVE

THE GRAND JURY, by this indictment, accuses the defendant, VALENTINO BUONO of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law §175.35(1) committed as follows:

Defendant VALENTINO BUONO, between on or about January 10, 2020, in the county of Queens and elsewhere, knowing that a written instrument, a New York City Department of Environmental Protection Inspection Report for a premise at 72-69 Kissena Boulevard, Queens, New York, on December 12, 2019, contained a false statement or false information, and with intent to defraud the state or any political subdivision,

public authority or public benefit corporation of the state, he offered or presented it to a public office, public servant, public authority, or public benefit corporation, with the knowledge or belief that it would be filed with, registered or recorded in or otherwise become a part of the records of such public office, public servant, public authority or public benefit corporation, to wit the New York City Department of Environmental Protection located at 59-17 Junction Boulevard, Queens, New York.

LETITIA JAMES
ATTORNEY GENERAL

BY:

A handwritten signature in black ink, appearing to be 'RS', written over a horizontal line.

AAG RUSSELL SATIN