SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF NEW YORK	X
THE PEOPLE OF THE STATE OF NEW YORK	INDICTMENT NO. <u>769</u> -2018
-against-	
CHRISTOPHER CHIERCHIO and ANTHONY MILOHNIC	
Defendants.	X
	A

COUNT ONE

THE GRAND JURY OF NEW YORK COUNTY, by this indictment, accuses the defendants, CHRISTOPHER CHIERCHIO and ANTHONY MILOHNIC, each aiding the other and acting in concert, of the crime of AGREEMENT, ARRANGEMENT, OR COMBINATION IN RESTRAINT OF TRADE OR COMPETITION, in violation of §§ 340 and 341 of the General Business Law of the State of New York, committed as follows:

From on or about August 17, 2015, through on or about October 30, 2015, in New York County, Suffolk County, Richmond County, and elsewhere within the State of New York, the defendants knowingly and intentionally entered into and engaged in a contract, agreement, arrangement, or combination in unreasonable restraint of competition or the free exercise of any activity in the conduct of any business, trade or commerce, or in the furnishing of any

service, to wit: to restrain competition in the bidding process for the plumbing and fire suppression contract related to a construction project at 613 Baltic Avenue, Brooklyn, New York.

Dated: March 27, 2018

New York County, New York

PERI ALYSE KADANOFF Deputy Attorney General Organized Crime Task Force

 $\mathbf{B}\mathbf{y}$

Christopher S. Clark

Assistant Deputy Attorney General Statewide Organized Crime Task Force 44 South Broadway

White Plains, NY 10601

A TRIJE RILI

GRAND JURY FOREPERSON

Dated: March 27, 2018

COUNTY OF NEW YORKX	
THE PEOPLE OF THE STATE OF NEW YORK	INDICTMENT NO. 770-ZOIS
-against-	
CHRISTOPHER CHIERCHIO, a.k.a. "Chris Chierchio,"	
DefendantX	

COUNT ONE

THE GRAND JURY OF NEW YORK COUNTY, by this indictment, accuses the defendant, CHRISTOPHER CHIERCHIO, of the crime of Criminal Tax Fraud in the Second Degree, in violation of § 1805 of the Tax Law of the State of New York, committed as follows:

From on or about April 18, 2016, through on or about March 27, 2018, in New York County, Richmond County, Albany County, and elsewhere within the State of New York, the defendant committed a tax fraud act or acts and, with intent to evade any tax due under the New York State Tax Law, or to defraud the State of New York or any subdivision thereof, paid the State of New York and/or a political subdivision thereof, by means of underpayment,

in a period of not more than one year in excess of fifty thousand dollars less than the tax liability that was due.

Dated: March 27, 2018 New York County, New York

> PERI ALYSE KADANOFF Deputy Attorney General Organized Crime Task Force

 $\mathbf{B}\mathbf{y}$

Christopher S. Clark

Assistant Deputy Attorney General Statewide Organized Crime Task Force 44 South Broadway

White Plains, NY 10601

A TRUE BILL

GRAND JURY FOREPERSON

Dated: March 27, 2018