

I N D I C T M E N T

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

PEOPLE OF THE STATE OF NEW YORK
AGAINST

- (X) CAMPBELL, MARCIA
DEFENDANT: IBNA
- (X) PALMER, FRANK
DEFENDANT: IBNA
- (X) CAMPBELL, FRED
DEFENDANT: IBNA
- (X) INC, 99 PATMOR AVE
DEFENDANT: IBNA

INDICTMENT #: *IND-74281-24*
GRAND JURY #: 43045/2024

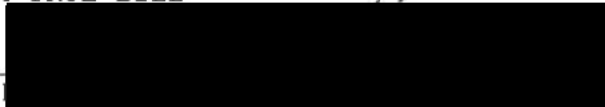
COUNTS

- GRAND LARCENY IN THE SECOND DEGREE
- CRIMINAL POSSESSION OF STOLEN PROPERTY IN THE SECOND DEGREE
- GRAND LARCENY IN THE THIRD DEGREE
- CRIMINAL POSSESSION OF STOLEN PROPERTY IN THE THIRD DEGREE
- FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE

ORIGINAL

SEP 25 2024

A Panel
10th Term
SEPTEMBER 23, 2024
A TRUE BILL



LETITIA JAMES
ATTORNEY GENERAL OF THE
STATE OF NEW YORK

FIRST COUNT

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

THE DEFENDANTS, ACTING IN CONCERT WITH EACH OTHER, ON OR ABOUT JUNE
26, 2019, IN THE COUNTY OF THE BRONX, DID STEAL PROPERTY HAVING A VALUE OF
MORE THAN FIFTY THOUSAND DOLLARS, THAT BEING 4169 BRONXWOOD AVENUE, BRONX, NY
10466, OWNED BY CHRYL WASHINGTON.

SECOND COUNT

THE GRAND JURY OF THE COUNTY OF THE BRONX BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF THE CRIME OF CRIMINAL POSSESSION OF STOLEN
PROPERTY IN THE SECOND DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, ACTING IN CONCERT WITH EACH OTHER ON OR ABOUT AND
BETWEEN JUNE 26, 2019 AND SEPTEMBER 9, 2024, IN THE COUNTY OF THE BRONX, DID
KNOWINGLY POSSESS STOLEN PROPERTY HAVING A VALUE OF MORE THAN FIFTY THOUSAND
DOLLARS, THAT BEING 4169 BRONXWOOD AVENUE, BRONX, NY 10466, OWNED BY CHRYL
WASHINGTON, WITH INTENT TO BENEFIT THEMSELVES OR A PERSON OTHER THAN AN
OWNER THEREOF OR TO IMPEDE THE RECOVERY BY AN OWNER THEREOF.

THIRD COUNT

THE GRAND JURY OF THE COUNTY OF THE BRONX BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF THE CRIME OF GRAND LARCENY IN THE THIRD DEGREE
COMMITTED AS FOLLOWS:

THE DEFENDANTS, ACTING IN CONCERT WITH EACH OTHER, ON OR ABOUT JUNE
26, 2019, IN THE COUNTY OF THE BRONX, DID STEAL PROPERTY HAVING A VALUE OF
MORE THAN THREE THOUSAND DOLLARS, THAT BEING 4169 BRONXWOOD AVENUE, BRONX,
NY 10466, OWNED BY CHRYL WASHINGTON.

FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF THE BRONX BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF THE CRIME OF CRIMINAL POSSESSION OF STOLEN
PROPERTY IN THE THIRD DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, ACTING IN CONCERT WITH EACH OTHER ON OR ABOUT AND BETWEEN JUNE 26, 2019 AND SEPTEMBER 9, 2024, IN THE COUNTY OF THE BRONX, DID KNOWINGLY POSSESS STOLEN PROPERTY VALUED IN EXCESS OF THREE THOUSAND DOLLARS, THAT BEING 4169 BRONXWOOD AVENUE, BRONX, NY 10466, OWNED BY CHRYSLEER WASHINGTON, WITH INTENT TO BENEFIT THEMSELVES OR A PERSON OTHER THAN AN OWNER THEREOF OR TO IMPEDE THE RECOVERY BY AN OWNER THEREOF.

FIFTH COUNT

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

THE DEFENDANTS, ACTING IN CONCERT WITH EACH OTHER, ON OR ABOUT JUNE 26, 2019, IN THE COUNTY OF THE BRONX, DID COMMIT THE CRIME OF FALSIFYING BUSINESS RECORDS IN THE SECOND DEGREE, WHERE THEIR INTENT TO DEFRAUD INCLUDED THE INTENT TO COMMIT ANOTHER CRIME OR TO AID OR CONCEAL THE COMMISSION THEREOF, BY SUBMITTING A SPECIALIZED LOAN SERVICING SHORT SALE AFFIDAVIT WITH FALSE INFORMATION TO SPECIALIZED LOAN SERVICING, LLC, CAUSING THE AFOREMENTIONED COMPANY TO CREATE A FALSE ENTRY IN THEIR RECORDS.

LETITIA JAMES
ATTORNEY GENERAL OF THE
STATE OF NEW YORK