

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

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PEOPLE OF THE STATE OF NEW YORK : **INDICTMENT**
-against- : Ind. No. 3769-2017
BRAD JACOBS and NICHOLAS SEWELL, :
Defendants. :

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THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendants, BRAD JACOBS AND NICHOLAS SEWELL, of the crime of ASSAULT IN THE FIRST DEGREE, in violation of Section 120.10(4) of the Penal Law, committed as follows:

The defendants, acting in concert, on or about November 11, 2012, in the County of New York and elsewhere, in the course of and in furtherance of the commission or attempted commission of a felony, caused serious physical injury to Witness 1, a person whose identity is known to the Grand Jury, who was not a participant in the crime.

SECOND COUNT

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendants, BRAD JACOBS AND NICHOLAS SEWELL, of the crime of ASSAULT IN THE SECOND DEGREE, in violation of Section 120.05(4) of the Penal Law, committed as follows:

The defendants, acting in concert, on or about November 11, 2012, in the County of New York and elsewhere, recklessly caused serious physical injury to Witness 1, a person whose identity is known to the Grand Jury, by means of a dangerous instrument.

THIRD COUNT:

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendants, BRAD JACOBS AND NICHOLAS SEWELL, of the crime of GRAND LARCENY IN THE THIRD DEGREE, in violation of Section 155.35(1) of the Penal Law, committed as follows:

The defendants, acting in concert, on or about and between November 11, 2012 and February 12, 2013, in the County of New York and elsewhere, stole property having a value in excess of three thousand dollars from Witness 1, a person whose identity is known to the Grand Jury.

FOURTH COUNT:

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendants, BRAD JACOBS AND NICHOLAS SEWELL, of the crime of GRAND LARCENY IN THE THIRD DEGREE, in violation of Section 155.35(1) of the Penal Law, committed as follows:

The defendants, acting in concert, on or about February 16, 2013, in the County of New York and elsewhere, stole property having a value in excess of three thousand dollars from Witness 2, a person whose identity is known to the Grand Jury.

FIFTH COUNT:

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendants, BRAD JACOBS AND NICHOLAS SEWELL, of the crime of GRAND LARCENY IN THE THIRD DEGREE, in violation of Section 155.35(1) of the Penal Law, committed as follows:

The defendants, acting in concert, on or about October 26, 2013, in the County of New York and elsewhere, stole property having a value in excess of three thousand dollars from Witness 3, a person whose identity is known to the Grand Jury.

SIXTH COUNT:

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendants, BRAD JACOBS AND NICHOLAS SEWELL, of the crime of GRAND LARCENY IN THE THIRD DEGREE, in violation of Section 155.35(1) of the Penal Law, committed as follows:

The defendants, acting in concert, on or about November 22, 2013, in the County of New York and elsewhere, stole property having a value in excess of three thousand dollars from Witness 4, a person whose identity is known to the Grand Jury.

SEVENTH COUNT:

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendants, BRAD JACOBS AND NICHOLAS SEWELL, of the crime of GRAND LARCENY IN THE THIRD DEGREE, in violation of Section 155.35(1) of the Penal Law, committed as follows:

The defendants, acting in concert, on or about March 27, 2014, in the County of New York and elsewhere, stole property having a value in excess of three thousand dollars from Witness 5, a person whose identity is known to the Grand Jury.

EIGHTH COUNT:

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendants, BRAD JACOBS AND NICHOLAS SEWELL, of the crime of GRAND LARCENY IN THE THIRD DEGREE, in violation of Section 155.35(1) of the Penal Law, committed as follows:

The defendants, acting in concert, on or about August 17, 2013, in the County of New York and elsewhere, stole property having a value in excess of three thousand dollars from Witness 6, a person whose identity is known to the Grand Jury.

NINTH COUNT:

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendants, BRAD JACOBS AND NICHOLAS SEWELL, of the crime of GRAND LARCENY IN THE THIRD DEGREE, in violation of Section 155.35(1) of the Penal Law, committed as follows:

The defendants, acting in concert, on or about May 17, 2014, in the County of New York and elsewhere, stole property having a value in excess of three thousand dollars from Witness 7, a person whose identity is known to the Grand Jury.

TENTH COUNT:

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendants, BRAD JACOBS AND NICHOLAS SEWELL, of the crime of GRAND LARCENY IN THE THIRD DEGREE, in violation of Section 155.35(1) of the Penal Law, committed as follows:

The defendants, acting in concert, on or about February 19, 2016, in the County of New York and elsewhere, stole property having a value in excess of three thousand dollars from Witness 8, a person whose identity is known to the Grand Jury.

ELEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, BRAD JACOBS, of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, on or about and between September 25, 2012 and June 2016, in the County of New York and elsewhere, not being authorized to practice medicine under the Education Law, a profession for which a license is a prerequisite, practiced or offered to practice or held himself out as being able to practice the profession of medicine, or practiced the profession of medicine as an exempt person during the time when his license was suspended, revoked or annulled, regarding Witness 9, a person whose identity is known to the Grand Jury.

TWELFTH COUNT

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, NICHOLAS SEWELL, of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, on or about and between September 25, 2012 and June 2016, in the County of New York and elsewhere, aided or abetted an unlicensed person, to wit: Brad Jacobs, to practice the profession of medicine, a profession for which a license is a prerequisite, regarding Witness 9, a person whose identity is known to the Grand Jury.

THIRTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, BRAD JACOBS, of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, on or about and between October 2012 and June 2014, in the County of New York and elsewhere, not being authorized to practice medicine under the Education Law, a profession for which a license is a prerequisite, practiced or offered to practice or held himself out as being able to practice the profession of medicine, or practiced the profession of medicine as an exempt person during the time when his license was suspended, revoked or annulled, regarding Witness 1, a person whose identity is known to the Grand Jury.

FOURTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, NICHOLAS SEWELL, of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, on or about and between October 2012 and June 2014, in the County of New York and elsewhere, aided or abetted an unlicensed person, to wit: Brad Jacobs, to practice the profession of medicine, a profession for which a license is a prerequisite, regarding Witness 1, a person whose identity is known to the Grand Jury.

FIFTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, BRAD JACOBS, of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, on or about and between January 2013 and March 2013, in the County of New York and elsewhere, not being authorized to practice medicine under the Education Law, a profession for which a license is a prerequisite, practiced or offered to practice or held himself out as being able to practice the profession of medicine, or practiced the profession of medicine as an exempt person during the time when his license was suspended, revoked or annulled, regarding Witness 2, a person whose identity is known to the Grand Jury.

SIXTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, NICHOLAS SEWELL, of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, on or about and between January 2013 and March 2013, in the County of New York and elsewhere, aided or abetted an unlicensed person, to wit: Brad Jacobs, to practice the profession of medicine, a profession for which a license is a prerequisite, regarding Witness 2, a person whose identity is known to the Grand Jury.

SEVENTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, BRAD JACOBS, of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, on or about and between October 2013 and November 2013, in the County of New York and elsewhere, not being authorized to practice medicine under the Education Law, a profession for which a license is a prerequisite, practiced or offered to practice or held himself out as being able to practice the profession of medicine, or practiced the profession of medicine as an exempt

person during the time when his license was suspended, revoked or annulled, regarding Witness 3, a person whose identity is known to the Grand Jury.

EIGHTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, NICHOLAS SEWELL, of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, on or about and between October 2013 and November 2013, in the County of New York and elsewhere, aided or abetted an unlicensed person, to wit: Brad Jacobs, to practice the profession of medicine, a profession for which a license is a prerequisite, regarding Witness 3, a person whose identity is known to the Grand Jury.

NINETEENTH COUNT

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, BRAD JACOBS, of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, on or about and between November 1, 2013 and November 24, 2013, in the County of New York and elsewhere, not being authorized to practice medicine under the Education Law, a profession for which a license is a prerequisite, practiced or offered to practice or held himself out as being able to practice the profession of medicine, or practiced the profession of medicine as an exempt person during the time when his license was suspended, revoked or annulled, regarding Witness 4, a person whose identity is known to the Grand Jury.

TWENTIETH COUNT

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, NICHOLAS SEWELL, of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, on or about and between November 1, 2013 and November 24, 2013, in the County of New York and elsewhere, aided or abetted an unlicensed person, to wit: Brad Jacobs, to practice the profession of medicine, a profession for which a license is a prerequisite, regarding Witness 4, a person whose identity is known to the Grand Jury.

TWENTY-FIRST COUNT

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, BRAD JACOBS, of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, on or about and between March 2014 and April 2014, in the County of New York and elsewhere, not being authorized to practice medicine under the Education Law, a profession for which a license is a prerequisite, practiced or offered to practice or held himself out as being able to practice the profession of medicine, or practiced the profession of medicine as an exempt person during the time when his license was suspended, revoked or annulled, regarding Witness 5, a person whose identity is known to the Grand Jury.

TWENTY-SECOND COUNT

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, NICHOLAS SEWELL, of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, on or about and between March 2014 and April 2014, in the County of New York and elsewhere, aided or abetted an unlicensed person, to wit: Brad Jacobs, to practice the profession of medicine, a profession for which a license is a prerequisite, regarding Witness 5, a person whose identity is known to the Grand Jury.

TWENTY-THIRD COUNT

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, BRAD JACOBS, of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, on or about and between August 1, 2013 and August 17, 2013, in the County of New York and elsewhere, not being authorized to practice medicine under the Education Law, a profession for which a license is a prerequisite, practiced or offered to practice or held himself out as being able to practice the profession of medicine, or practiced the profession of medicine as an exempt person during the time when his license was suspended, revoked or annulled, regarding Witness 6, a person whose identity is known to the Grand Jury.

TWENTY-FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, NICHOLAS SEWELL, of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, on or about and between August 1, 2013 and August 17, 2013, in the County of New York and elsewhere, aided or abetted an unlicensed person, to wit: Brad Jacobs, to practice the profession of medicine, a profession for which a license is a prerequisite, regarding Witness 6, a person whose identity is known to the Grand Jury.

TWENTY-FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, BRAD JACOBS, of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, on or about May 17, 2014, in the County of New York and elsewhere, not being authorized to practice medicine under the Education Law, a profession for which a license is a prerequisite, practiced or offered to practice or held himself out as being able to practice the profession of medicine, or practiced the profession of medicine as an exempt person during the time when his license was suspended, revoked or annulled, regarding Witness 7, a person whose identity is known to the Grand Jury.

TWENTY-SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, NICHOLAS SEWELL, of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, on or about May 17, 2014, in the County of New York and elsewhere, aided or abetted an unlicensed person, to wit: Brad Jacobs, to practice the profession of medicine, a profession for which a license is a prerequisite, regarding Witness 7, a person whose identity is known to the Grand Jury.

TWENTY-SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, BRAD JACOBS, of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, on or about and between February 19, 2016 and February 25, 2016, in the County of New York and elsewhere, not being authorized to practice medicine under the Education Law, a profession for which a license is a prerequisite, practiced or offered to practice or held himself out as being able to practice the profession of medicine, or practiced the profession of medicine as an exempt person during the time when his license was suspended, revoked or annulled, regarding Witness 8, a person whose identity is known to the Grand Jury.

TWENTY-EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, NICHOLAS SEWELL, of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, on or about and between February 19, 2016 and February 25, 2016, in the County of New York and elsewhere, aided or abetted an unlicensed person, to wit: Brad Jacobs, to practice the profession of medicine, a profession for which a license is a prerequisite, regarding Witness 8, a person whose identity is known to the Grand Jury.

TWENTY-NINTH COUNT

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendants, BRAD JACOBS and NICHOLAS SEWELL, of the crime of SCHEME TO DEFRAUD IN THE FIRST DEGREE, in violation of Section 190.65(1)(a) of the Penal Law, committed as follows:

The defendants, acting in concert, on or about and between September 25, 2012 and June 2016, in the County of New York and elsewhere, engaged in a scheme constituting a systematic ongoing course of conduct with intent to defraud ten or more persons or to obtain property from ten or more

persons by false or fraudulent pretenses, representations or promises, and so obtained property from one or more such persons.

THIRTIETH COUNT

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, further accuses the defendants, BRAD JACOBS AND NICHOLAS SEWELL, of the crime of a SCHEME TO DEFRAUD IN THE FIRST DEGREE, in violation of Section 190.65(1)(b) of the Penal Law, committed as follows:

The defendants, acting in concert, on or about and between September 25, 2012 and June 2016, in the County of New York and elsewhere, engaged in a scheme constituting a systematic ongoing course of conduct with intent to defraud more than one person or to obtain property from more than one person by false or fraudulent pretenses, representations or promises, and so obtained property with a value in excess of one thousand dollars from one or more such persons.

THIRTY-FIRST COUNT:

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendants, BRAD JACOBS AND NICHOLAS SEWELL, of the crime of MONEY LAUNDERING IN THE FOURTH DEGREE, in violation of Section 470.05(1)(a)(ii)(A) of the Penal Law, committed as follows:

The defendants, acting in concert, on or about and between September 25, 2012 and June 25, 2016, in the County of New York and elsewhere, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, knowing that the transaction or transactions in whole or in part were designed to conceal or disguise the nature, the location, the source, the ownership or the control of the proceeds of criminal conduct,

and the total value of the property involved in such financial transaction or transactions exceeded five thousand dollars.

S/

ERIC T. SCHNEIDERMAN
Attorney General of the State of New York

CU # _____

Filed: November 6, 2017 N/A

4TH GRAND JURY

No. 3769 - 2017

THE PEOPLES OF THE STATE OF NEW YORK

-against-

BRAD JACOBS AND NICHOLAS SEWELL,
Defendants.

INDICTMENT

ASSAULT IN THE FIRST DEGREE, P.L. § 120.10(4) (1 Count)(both defendants)
ASSAULT IN THE SECOND DEGREE, P.L. § 120.05(4) (1 Count)(both defendants)
GRAND LARCENY IN THE THIRD DEGREE, P.L. § 155.25(1) (5 Counts)(both defendants)
UNAUTHORIZED PRACTICE OF A PROFESSION, Ed. Law § 6512(1) (9 Counts)(defendant Jacobs)
UNAUTHORIZED PRACTICE OF A PROFESSION, Ed. Law § 6512(1) (9 Counts)(defendant Sewell)
SCHEME TO DEFAUD IN THE FIRST DEGREE, P.L. § 190.65(1)(a) (1 Count)(both defendants)
SCHEME TO DEFAUD IN THE FIRST DEGREE, P.L. § 190.65(1)(b) (1 Count)(both defendants)
MONEY LAUNDERING IN THE FOURTH DEGREE, P.L. § 470.05(1)(a)(ii)(A) (1 Count)(both defendants)

ERIC T. SCHEINERMAN,
Attorney General of the State of New York

A True Bill:

5/
Foreman

A. A.G. Rhonda Greenstein
Tel: 212-416-8161