

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

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THE PEOPLE OF THE STATE OF NEW YORK

INDICTMENT NO. \_\_\_\_

-against-

ANA CANDANEDO,  
GEORGE ATHANASATOS

DEFENDANTS.

-----X

**COUNT ONE**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, accuses the defendants, ANA CANDANEDO and GEORGE ATHANASATOS, of the crime of CONSPIRACY IN THE FIFTH DEGREE, in violation of § 105.05 of the Penal Law of the State of New York, committed as follows:

From on or about August 23, 2016, through on or about September 26, 2016, in Nassau County, New York County, and Kings County within the State of New York, and elsewhere, with intent that conduct constituting the felony of Criminal Possession of a Forged Instrument in the Second Degree, in violation of Penal Law § 170.25, be performed, the defendants agreed with each other to engage in or cause the performance of such conduct as would constitute the above-mentioned felony.

**PREAMBLE**

It was the purpose of this conspiracy to possess forged instruments that were or purported to be, or were calculated to become or to represent if completed, public records or instruments filed or required or authorized by law to be filed in or with a public office or public servant, with the knowledge that they were forged and with the intent to defraud,

deceive, or injure another, in Nassau County, New York County, and Kings County within the State of New York, and elsewhere.

It was part of this conspiracy for ANA CANDANEDO to possess a falsely completed written instrument, which was or purported to be a public record, or an instrument filed or required or authorized by law to be filed in or with a public office or public servant in Nassau County.

It was part of this conspiracy for GEORGE ATHANASATOS to falsely complete a written instrument, which was or purported to be a public record, or an instrument filed or required or authorized by law to be filed in or with a public office or public servant in Nassau County.

### **OVERT ACTS**

In the furtherance of the conspiracy and to effect the objects thereof, from on or about August 23, 2016 through on or about September 26, 2016, the following overt acts, among others, were committed:

1. On or about August 23, 2016, ANA CANDANEDO and GEORGE ATHANASATOS engaged in a conversation during which GEORGE ATHANASATOS stated in sum and substance, “you gotta intercept it man, don’t be a knucklehead. You intercept it, you give me a call, I’ll even come all the way to Long Island for you. I’ll fill it out, I’ll write, I’ll write it out, and I’ll mail it back to this asshole.” Later in the conversation, ANA CANDANEDO stated in sum and substance, “I’m tryin’ to figure out what time the mailman mail comes.”

2. On or about August 24, 2016, ANA CANDANEDO and GEORGE ATHANASATOS engaged in a conversation during which ANA CANDANEDO stated in sum and substance “I was talking with the post, at the post office man . . . he said he’ll hold, if he

see it he'll hold it for me and call me and give it to me." Later in that conversation, GEORGE ATHANASATOS stated in sum and substance, "Okay, yeah the rest is easy I'll come there, I'll fill it out nice, put it in the mailbox over there . . . And that's it. In that neighborhood so it's postmarked, you know so she sees where it's postmarked from, you know what I mean? . . . Yeah, 'cause I don't wanna postmark it from Brooklyn, she might be smart and say 'what the fuck is this' you know?"

3. On or about August 27, 2016, GEORGE ATHANASATOS falsely completed a Department of Social Services "Rental Verification" form, with intent that it be submitted to Nassau County Department of Social Services.

4. On or about August 28, 2016, GEORGE ATHANASATOS falsely completed a Department of Social Services "Shelter Verification" form, with intent that it be submitted to Nassau County Department of Social Services.

5. On or about August 30, 2016, ANA CANDANEDO submitted, via facsimile, a falsely completed Department of Social Services "Rental Verification" form to Nassau County Department of Social Services.

6. On or about August 30, 2016, ANA CANDANEDO submitted, via facsimile, a falsely completed Department of Social Services "Shelter Verification" form to Nassau County Department of Social Services.

7. On or about September 20, 2016, GEORGE ATHANASATOS falsely completed a Department of Social Services "Shelter Verification" form, with intent that it be submitted to Nassau County Department of Social Services.

8. On or about September 23, 2016, ANA CANDANEDO submitted, via mail, a falsely completed Department of Social Services "Shelter Verification" form to Nassau County Department of Social Services.

**COUNT TWO**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, further accuses the defendants, ANA CANDANEDO and GEORGE ATHANASATOS, each aiding the other and acting in concert, of the crime of Forgery in the Second Degree, in violation of New York Penal Law § 170.10, committed as follows:

The defendants, on or about August 27, 2016, in the County of Nassau, with intent to defraud, deceive or injure another, falsely made, completed or altered a written instrument which was or purported to be, or which was calculated to become or to represent if completed, a public record, or an instrument filed or required or authorized by law to be filed in or with a public office or public servant, to wit: a Department of Social Services “Rental Verification” form dated August 27, 2016.

**COUNT THREE**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, further accuses the defendants, ANA CANDANEDO and GEORGE ATHANASATOS, each aiding the other and acting in concert, of the crime of Forgery in the Second Degree, in violation of New York Penal Law § 170.10, committed as follows:

The defendants, on or about August 28, 2016, in the County of Nassau, with intent to defraud, deceive or injure another, falsely made, completed, or altered a written instrument which was or purported to be, or which was calculated to become or to represent if completed, a public record, or an instrument filed or required or authorized by law to be filed in or with a public office or public servant, to wit: a Department of Social Services “Shelter Verification” form dated August 28, 2016.

**COUNT FOUR**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, further accuses the defendants, ANA CANDANEDO and GEORGE ATHANASATOS, each aiding the other and acting in concert, of the crime of Criminal Possession of a Forged Instrument in the Second Degree, in violation of New York Penal Law § 170.25, committed as follows:

The defendants, on or about August 30, 2016, in the County of Nassau, with knowledge that it was forged and with intent to defraud, deceive, or injure another, uttered or possessed any forged instrument of a kind specified in § 170.10, to wit: a Department of Social Services “Rental Verification” form dated August 27, 2016.

**COUNT FIVE**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, further accuses the defendants, ANA CANDANEDO and GEORGE ATHANASATOS, each aiding the other and acting in concert, of the crime of Criminal Possession of a Forged Instrument in the Second Degree, in violation of New York Penal Law § 170.25, committed as follows:

The defendants, on or about August 30, 2016, in the County of Nassau, with knowledge that it was forged and with intent to defraud, deceive, or injure another, uttered or possessed any forged instrument of a kind specified in § 170.10, to wit: a Department of Social Services “Shelter Verification” form dated August 28, 2016.

**COUNT SIX**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, further accuses the defendants, ANA CANDANEDO and GEORGE ATHANASATOS, each aiding the other and acting in concert, of the crime of Offering a False Instrument for Filing in the First Degree, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about August 30, 2016, in the County of Nassau, knowing that a written instrument, to wit: a “Rental Verification” form dated August 27, 2016,

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, 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.

#### **COUNT SEVEN**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, further accuses the defendants, ANA CANDANEDO and GEORGE ATHANASATOS, each aiding the other and acting in concert, of the crime of Offering a False Instrument for Filing in the First Degree, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about August 30, 2016, in the County of Nassau, knowing that a written instrument, to wit: a “Shelter Verification” form dated August 28, 2016 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, 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.

#### **COUNT EIGHT**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, further accuses the defendants, ANA CANDANEDO and GEORGE ATHANASATOS, each aiding the other and

acting in concert, of the crime of Falsifying Business Records in the First Degree, in violation of New York Penal Law § 175.10, committed as follows:

The defendants, on or about August 30, 2016, in the County of Nassau, with intent to defraud, made or caused a false entry in the business records of an enterprise, to wit: Nassau County Department of Social Services, and their intent to defraud included an intent to commit another crime or to aid or conceal the commission thereof.

**COUNT NINE**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, further accuses the defendants, ANA CANDANEDO and GEORGE ATHANASATOS, each aiding the other and acting in concert, of the crime of Falsifying Business Records in the First Degree, in violation of New York Penal Law § 175.10, committed as follows:

The defendants, on or about August 30, 2016, in the County of Nassau, with intent to defraud, made or caused a false entry in the business records of an enterprise, to wit: Nassau County Department of Social Services, and their intent to defraud included an intent to commit another crime or to aid or conceal the commission thereof.

**COUNT TEN**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, further accuses the defendants, ANA CANDANEDO and GEORGE ATHANASATOS, each aiding the other and acting in concert, of the crime of Forgery in the Second Degree, in violation of New York Penal Law § 170.10, committed as follows:

The defendants, on or about September 20, 2016, in the County of Nassau, with intent to defraud, deceive or injure another, falsely made, completed, or altered a written instrument which was or purported to be, or which was calculated to become or to represent if completed, a public record, or an instrument filed or required or authorized by law to be filed in or with

a public office or public servant, to wit: a Department of Social Services “Shelter Verification” form dated September 20, 2016.

**COUNT ELEVEN**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, further accuses the defendants, ANA CANDANEDO and GEORGE ATHANASATOS, each aiding the other and acting in concert, of the crime of Criminal Possession of a Forged Instrument in the Second Degree, in violation of New York Penal Law § 170.25, committed as follows:

The defendants, on or about September 23, 2016, in the County of Nassau, with knowledge that it was forged and with intent to defraud, deceive, or injure another, uttered or possessed any forged instrument of a kind specified in § 170.10, to wit: a Department of Social Services “Shelter Verification” form dated September 20, 2016.

**COUNT TWELVE**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, further accuses the defendants, ANA CANDANEDO and GEORGE ATHANASATOS, each aiding the other and acting in concert, of the crime of Offering a False Instrument for Filing in the First Degree, in violation of Penal Law § 175.35, committed as follows:

The defendants, on or about September 23, 2016, in the County of Nassau, knowing that a written instrument, to wit: a “Shelter Verification” form dated September 20, 2016, 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, 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.

**COUNT THIRTEEN**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, further accuses the defendants, ANA CANDANEDO and GEORGE ATHANASATOS, each aiding the other and acting in concert, of the crime of Falsifying Business Records in the First Degree, in violation of New York Penal Law § 175.10, committed as follows:

The defendants, on or about September 23, 2016, in the County of Nassau, with intent to defraud, made or caused a false entry in the business records of an enterprise, to wit: Nassau County Department of Social Services, and their intent to defraud included an intent to commit another crime or to aid or conceal the commission thereof.

**COUNT FOURTEEN**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, further accuses the defendants, ANA CANDANEDO and GEORGE ATHANASATOS, each aiding the other and acting in concert, of the crime of Welfare Fraud in the Fourth Degree, in violation of New York Penal Law § 158.10, committed as follows:

The defendants, on or about and between August 27, 2016 and September 23, 2016, in the County of Nassau, committed a fraudulent welfare act and thereby took or obtained public assistance benefits, and the value of the public assistance benefits exceeded one thousand dollars.

**COUNT FIFTEEN**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, further accuses the defendants, ANA CANDANEDO and GEORGE ATHANASATOS, each aiding the other and acting in concert, of the crime of Grand Larceny in the Fourth Degree, in violation of New York Penal Law § 155.30, committed as follows:

The defendants, on or about and between August 27, 2016 and September 23, 2016, in the County of Nassau, stole property, to wit: benefits from Nassau County Department of Social Services, and the value of the property exceeded one thousand dollars.

Dated: March 8, 2017

Nassau County, New York

PERI ALYSE KADANOFF  
Deputy Attorney General  
Organized Crime Task Force

By \_\_\_\_\_  
Christopher S. Clark  
Assistant Deputy Attorney General  
Statewide Organized Crime Task Force  
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White Plains, NY 10601

**A TRUE BILL**

\_\_\_\_\_  
GRAND JURY FOREPERSON  
Dated: March \_\_, 2017