

Indictment No. 1533-07

WESTCHESTER COUNTY
COUNTY COURT

THE PEOPLE OF THE STATE OF NEW YORK

-against-

**ANISHA CASIMIR,
PHILIP CASIMIR,
HURTIG-EVANS INTERNATIONAL INCORPORATED A/K/A
HURTIG-EVANS INCORPORATED A/K/A HEI**

Defendants.

**ANDREW M. CUOMO
Attorney General
of the State of New York**

A TRUE BILL

The below signature directs the Attorney General to file this Instrument with the Impanelling Court

Foreperson of the Grand Jury


Acting Foreperson of the Grand Jury

Charges:

Grand Larceny in the First Degree, Penal Law § 155.42 (1 Count)
Unlicensed Practice, in Violation of Education Law § 65.12 (2) (1 Count)
Offering a False Instrument for Filing in the First Degree, Penal Law § 175.35 (23 Counts)
Criminal Possession of a Forged Instrument in the Second Degree, Penal Law § 170.25 (19 counts)

SUPREME COURT OF THE STATE OF NEW YORK
WESTCHESTER COUNTY

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THE PEOPLE OF THE STATE OF NEW YORK,

- against -

INDICTMENT
NO. 1533/2007

ANISHA CASIMIR,
PHILIP CASIMIR,
HURTIG-EVANS INTERNATIONAL INCORPORATED
a/k/a HURTIG-EVANS INCORPORATED
a/k/a HEI,

Defendants.

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COUNT ONE

THE GRAND JURY of the county of Westchester, by this indictment, accuses the defendants of the crime of **GRAND LARCENY IN THE FIRST DEGREE, in violation of Penal Law § 155.42**, committed as follows:

The defendants, in the County of Westchester and elsewhere, during a period from about March 17, 2001 to about February 7, 2006, stole property having a value in excess of \$1,000,000 from the State of New York.

COUNT TWO

AND THE GRAND JURY AFORESAID, by this indictment, accuses the defendants of the crime of **UNLICENSED PRACTICE, in violation of Education Law § 65.12(2)**, committed as follows:

The defendants, in the County of Westchester and elsewhere, during a period from about March 17, 2001 to about February 7, 2006, knowingly aided and abetted three or more unlicensed persons to practice a profession and employed and held such unlicensed persons out as being able to practice in that profession in which a license is a prerequisite to the practice of the acts.

COUNT THREE

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants 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, in the County of Westchester and elsewhere, on or about December 19, 2005, knowing that a written instrument, to wit, a time sheet bearing the name "MB Austin" that was filed with the New York State Office of Alcohol and Substance Abuse Service ("OASAS"), contained a false statement and false information, and with intent to defraud the state and a political subdivision thereof, offered and presented it to a public office and public servant, with the knowledge and belief that it would be filed, registered and recorded in and otherwise become part of the records of such public office and public servant.

COUNT FOUR

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants 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, in the County of Westchester and elsewhere, on or about December 26, 2005, knowing that a written instrument, to wit, a time sheet bearing the name "B Austin" that was filed with OASAS, contained a false statement and false information, and with intent to defraud the state and a political subdivision thereof, offered and presented it to a public office and public servant, with the knowledge and belief that it would be filed, registered and recorded in and otherwise become part of the records of such public office and public servant.

COUNT FIVE

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants 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, in the County of Westchester and elsewhere, on or about December 26, 2005, knowing that a written instrument, to wit, a license bearing the name "Austin Barbara M" that was sent to OASAS, contained a false statement and false information, and with intent to defraud the state and a political subdivision thereof, offered and presented it to a public office and public servant, with the knowledge and belief that it would be filed, registered and recorded in and otherwise become part of the records of such public office and public servant.

COUNT SIX

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants 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, in the County of Westchester and elsewhere, on or about December 26, 2005, knowing that a written instrument, to wit, a time sheet bearing the name “ J Batson” that was filed with the Metro New York Developmental Disability Services Office (“Metro DDSO”), contained a false statement and false information, and with intent to defraud the state and a political subdivision thereof, offered and presented it to a public office and public servant, with the knowledge and belief that it would be filed, registered and recorded in and otherwise become part of the records of such public office and public servant.

COUNT SEVEN

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants 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, in the County of Westchester and elsewhere, on or about December 26, 2005, knowing that a written instrument, to wit, a time sheet bearing the name “Z Akhtar” that was filed with Metro DDSO, contained a false statement and false information, and with intent to defraud the state and a political subdivision thereof, offered and presented it to a public office and public servant, with the knowledge and belief that it would be filed, registered and recorded in and otherwise become part of the records of such public office and public servant.

COUNT EIGHT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants 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, in the County of Westchester and elsewhere, on or about December 26, 2005, knowing that a written instrument, to wit, a time sheet bearing the name "G Seraphin" that was filed with Metro DDSO, contained a false statement and false information, and with intent to defraud the state and a political subdivision thereof, offered and presented it to a public office and public servant, with the knowledge and belief that it would be filed, registered and recorded in and otherwise become part of the records of such public office and public servant.

COUNT NINE

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants 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, in the County of Westchester and elsewhere, on or about December 19, 2005, knowing that a written instrument, to wit, a time sheet bearing the name "Gabrielle M. Seraphin" that was filed with Metro DDSO, contained a false statement and false information, and with intent to defraud the state and a political subdivision thereof, offered and presented it to a public office and public servant, with the knowledge and belief that it would be filed, registered and recorded in and otherwise become part of the records of such public office and public servant.

COUNT TEN

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants 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, in the County of Westchester and elsewhere, on or about December 26, 2005, knowing that a written instrument, to wit, a license bearing the name “Andrea Anna Togbor Togni” that was sent to Metro DDSO, contained a false statement and false information, and with intent to defraud the state and a political subdivision thereof, offered and presented it to a public office and public servant, with the knowledge and belief that it would be filed, registered and recorded in and otherwise become part of the records of such public office and public servant.

COUNT ELEVEN

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants 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, in the County of Westchester and elsewhere, on or about December 26, 2005, knowing that a written instrument, to wit, a license bearing the name “Donna M. Douglas” that was sent to Metro DDSO, contained a false statement and false information, and with intent to defraud the state and a political subdivision thereof, offered and presented it to a public office and public servant, with the knowledge and belief that it would be filed, registered and recorded in and otherwise become part of the records of such public office and public servant.

COUNT TWELVE

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants 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, in the County of Westchester and elsewhere, on or about December 26, 2005, knowing that a written instrument, to wit, a license bearing the name “Jetris Marilyn. Batson” that was sent to Metro DDSO, contained a false statement and false information, and with intent to defraud the state and a political subdivision thereof, offered and presented it to a public office and public servant, with the knowledge and belief that it would be filed, registered and recorded in and otherwise become part of the records of such public office and public servant.

COUNT THIRTEEN

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants 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, in the County of Westchester and elsewhere, on or about December 19, 2005, knowing that a written instrument, to wit, a time sheet bearing the name “A. Togni” with the signature “A Togni” for work done at Bainbridge Facility that was filed with Metro DDSO, contained a false statement and false information, and with intent to defraud the state and a political subdivision thereof, offered and presented it to a public office and public servant, with the knowledge and belief that it would be filed, registered and recorded in and otherwise become part of the records of such public office and public servant.

COUNT FOURTEEN

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants 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, in the County of Westchester and elsewhere, on or about December 19, 2005, knowing that a written instrument, to wit, a time sheet bearing the name "A Togni" with the signature "A Tog" for work done at Southern Blvd. Day Care that was filed with Metro DDSO, contained a false statement and false information, and with intent to defraud the state and a political subdivision thereof, offered and presented it to a public office and public servant, with the knowledge and belief that it would be filed, registered and recorded in and otherwise become part of the records of such public office and public servant.

COUNT FIFTEEN

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants 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, in the County of Westchester and elsewhere, on or about December 19, 2005, knowing that a written instrument, to wit, a time sheet bearing the name "E Nyarko" that was filed with Metro DDSO, contained a false statement and false information, and with intent to defraud the state and a political subdivision thereof, offered and presented it to a public office and public servant, with the knowledge and belief that it would be filed, registered and recorded in and otherwise become part of the records of such public office and public servant.

COUNT SIXTEEN

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants 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, in the County of Westchester and elsewhere, on or about December 26, 2005, knowing that a written instrument, to wit, a time sheet bearing the name "E M Nyarko" that was filed with Metro DDSO, contained a false statement and false information, and with intent to defraud the state and a political subdivision thereof, offered and presented it to a public office and public servant, with the knowledge and belief that it would be filed, registered and recorded in and otherwise become part of the records of such public office and public servant.

COUNT SEVENTEEN

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants 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, in the County of Westchester and elsewhere, on or about December 19, 2005, knowing that a written instrument, to wit, a time sheet bearing the name "C. Maude Walcott" that was filed with Metro DDSO, contained a false statement and false information, and with intent to defraud the state and a political subdivision thereof, offered and presented it to a public office and public servant, with the knowledge and belief that it would be filed, registered and recorded in and otherwise become part of the records of such public office and public servant.

COUNT EIGHTEEN

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants 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, in the County of Westchester and elsewhere, on or about December 19, 2005, knowing that a written instrument, to wit, a time sheet bearing the name "CO Olumese" that was filed with Metro DDSO, contained a false statement and false information, and with intent to defraud the state and a political subdivision thereof, offered and presented it to a public office and public servant, with the knowledge and belief that it would be filed, registered and recorded in and otherwise become part of the records of such public office and public servant.

COUNT NINETEEN

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants 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, in the County of Westchester and elsewhere, on or about December 26, 2005, knowing that a written instrument, to wit, a time sheet bearing the name "CM Walcott" for work done at Longfellow Facility that was filed with Metro DDSO, contained a false statement and false information, and with intent to defraud the state and a political subdivision thereof, offered and presented it to a public office and public servant, with the knowledge and belief that it would be filed, registered and recorded in and otherwise become part of the records of such public office and public servant.

COUNT TWENTY

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants 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, in the County of Westchester and elsewhere, on or about December 26, 2005, knowing that a written instrument, to wit, a time sheet bearing the name "CM Walcott" for work done at Bainbridge Facility that was filed with Metro DDSO, contained a false statement and false information, and with intent to defraud the state and a political subdivision thereof, offered and presented it to a public office and public servant, with the knowledge and belief that it would be filed, registered and recorded in and otherwise become part of the records of such public office and public servant.

COUNT TWENTY-ONE

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants 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, in the County of Westchester and elsewhere, on or about December 26, 2005, knowing that a written instrument, to wit, a time sheet bearing the name "CM Walcott" for work done at Aldus Group Home that was filed with Metro DDSO, contained a false statement and false information, and with intent to defraud the state and a political subdivision thereof, offered and presented it to a public office and public servant, with the knowledge and belief that it would be filed, registered and recorded in and otherwise become part of the records of such public office and public servant.

COUNT TWENTY-TWO

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants 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, in the County of Westchester and elsewhere, on or about December 26, 2005, knowing that a written instrument, to wit, a license bearing the name “Eva Margaret Nyarko” that was filed with Metro DDSO, contained a false statement and false information, and with intent to defraud the state and a political subdivision thereof, offered and presented it to a public office and public servant, with the knowledge and belief that it would be filed, registered and recorded in and otherwise become part of the records of such public office and public servant.

COUNT TWENTY-THREE

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants 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, in the County of Westchester and elsewhere, on or about December 26, 2005, knowing that a written instrument, to wit, a license bearing the name “Carolyn Felicia O. Olumese” that was sent to Metro DDSO, contained a false statement and false information, and with intent to defraud the state and a political subdivision thereof, offered and presented it to a public office and public servant, with the knowledge and belief that it would be filed, registered and recorded in and otherwise become part of the records of such public office and public servant.

COUNT TWENTY-FOUR

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants 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, in the County of Westchester and elsewhere, on or about January 23, 2006, knowing that a written instrument, to wit, a license bearing the name “J Melissa Richards” that was sent to Metro DDSO, contained a false statement and false information, and with intent to defraud the state and a political subdivision thereof, offered and presented it to a public office and public servant, with the knowledge and belief that it would be filed, registered and recorded in and otherwise become part of the records of such public office and public servant.

COUNT TWENTY-FIVE

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants 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, in the County of Westchester and elsewhere, on or about November 14, 2005, knowing that a written instrument, to wit, a license bearing the name “Zorina Pena” that was sent to Hudson Valley Developmental Disability Services Organization (“Hudson Valley DDSO”), contained a false statement and false information, and with intent to defraud the state and a political subdivision thereof, offered and presented it to a public office and public servant, with the knowledge and belief that it would be filed, registered and recorded in and otherwise become part of the records of such public office and public servant.

COUNT TWENTY-SIX

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants of the crime of **CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, in violation of Penal Law § 170.25**, committed as follows:

The defendants, from about December 16, 2005 to about March 30, 2006, in the County of Westchester, with knowledge that it was forged and with intent to defraud, deceive and injure another, uttered and possessed a forged instrument, namely, a time sheet bearing the name "A. Togni" for worked performed at Bainbridge Group Home for week ending December 16, 2005.

COUNT TWENTY-SEVEN

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants of the crime of **CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, in violation of Penal Law § 170.25**, committed as follows:

The defendants, from about December 16, 2005 to about March 30, 2006, in the County of Westchester, with knowledge that it was forged and with intent to defraud, deceive and injure another, uttered and possessed a forged instrument, namely, a time sheet bearing the name "A. Togni" for work performed at Southern Blvd. Day Care for week ending December 16, 2005.

COUNT TWENTY-EIGHT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants of the crime of **CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, in violation of Penal Law § 170.25**, committed as follows:

The defendants, from about January 29, 2006 to about March 30, 2006, in the County of Westchester, with knowledge that it was forged and with intent to defraud, deceive and injure another, uttered and possessed a forged instrument, namely, a time sheet bearing the name "Z.S. Akhtar" for week ending January 29, 2006.

COUNT TWENTY-NINE

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants of the crime of **CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, in violation of Penal Law § 170.25**, committed as follows:

The defendants, from about January 13, 2006 to about March 30, 2006, in the County of Westchester, with knowledge that it was forged and with intent to defraud, deceive and injure another, uttered and possessed a forged instrument, namely, a time sheet bearing the name "Z.S. Akhtar" for week ending January 13, 2006.

COUNT THIRTY

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants of the crime of **CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, in violation of Penal Law § 170.25**, committed as follows:

The defendants, from about January 1, 2006 to about March 30, 2006, in the County of Westchester, with knowledge that it was forged and with intent to defraud, deceive and injure another, uttered and possessed a forged instrument, namely, a time sheet bearing the name "B. Austin" for week ending January 1, 2006.

COUNT THIRTY-ONE

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants of the crime of **CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, in violation of Penal Law § 170.25**, committed as follows:

The defendants, from about December 16, 2005 to about March 30, 2006, in the County of Westchester, with knowledge that it was forged and with intent to defraud, deceive and injure another, uttered and possessed a forged instrument, namely, a time sheet bearing the name "M B Austin" for week ending December 16, 2005.

COUNT THIRTY-TWO

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants of the crime of **CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, in violation of Penal Law § 170.25**, committed as follows:

The defendants, from about December 14, 2005 to about March 30, 2006, in the County of Westchester, with knowledge that it was forged and with intent to defraud, deceive and injure another, uttered and possessed a forged instrument, namely, a time sheet bearing the name "C.O. Olumese," dated December 14, 2005, as the last day worked for the week.

COUNT THIRTY-THREE

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants of the crime of **CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, in violation of Penal Law § 170.25**, committed as follows:

The defendants, from about January 21, 2006 to about March 30, 2006, in the County of Westchester, with knowledge that it was forged and with intent to defraud, deceive and injure another, uttered and possessed a forged instrument, namely, a time sheet bearing the name "C. Walcott" for week ending January 21, 2006.

COUNT THIRTY-FOUR

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants of the crime of **CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, in violation of Penal Law § 170.25**, committed as follows:

The defendants, from about January 27, 2006 to about March 30, 2006, in the County of Westchester, with knowledge that it was forged and with intent to defraud, deceive and injure another, uttered and possessed a forged instrument, namely, a time sheet bearing the name "C. Walcott" for week ending January 27, 2006.

COUNT THIRTY-FIVE

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants of the crime of **CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, in violation of Penal Law § 170.25**, committed as follows:

The defendants, from about February 3, 2006 to about March 30, 2006, in the County of Westchester, with knowledge that it was forged and with intent to defraud, deceive and injure another, uttered and possessed a forged instrument, namely, a time sheet bearing the name "C. Walcott" for week ending February 3, 2006.

COUNT THIRTY-SIX

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants of the crime of **CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, in violation of Penal Law § 170.25**, committed as follows:

The defendants, from about January 13, 2006 to about March 30, 2006, in the County of Westchester, with knowledge that it was forged and with intent to defraud, deceive and injure another, uttered and possessed a forged instrument, namely, a time sheet bearing the name "C. Walcott" for week ending January 13, 2006.

COUNT THIRTY-SEVEN

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants of the crime of **CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, in violation of Penal Law § 170.25**, committed as follows:

The defendants, from about January 16, 2006 to about March 30, 2006, in the County of Westchester, with knowledge that it was forged and with intent to defraud, deceive and injure another, uttered and possessed a forged instrument, namely, a time sheet bearing the name "C. M Walcott," dated January 16, 2006, as the last day worked for the week.

COUNT THIRTY-EIGHT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants of the crime of **CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, in violation of Penal Law § 170.25**, committed as follows:

The defendants, from about January 20, 2006 to about March 30, 2006, in the County of Westchester, with knowledge that it was forged and with intent to defraud, deceive and injure another, uttered and possessed a forged instrument, namely, a time sheet bearing the name "C. Walcott" for week ending January 20, 2006.

COUNT THIRTY-NINE

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants of the crime of **CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, in violation of Penal Law § 170.25**, committed as follows:

The defendants, from about December 17, 2005 to about March 30, 2006, in the County of Westchester, with knowledge that it was forged and with intent to defraud, deceive and injure another, uttered and possessed a forged instrument, namely, a time sheet bearing the name "C. Maude Walcott" for week ending December 17, 2005.

COUNT FORTY

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants of the crime of **CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, in violation of Penal Law § 170.25**, committed as follows:

The defendants, from about January 6, 2006 to about March 30, 2006, in the County of Westchester, with knowledge that it was forged and with intent to defraud, deceive and injure another, uttered and possessed a forged instrument, namely, a time sheet bearing the name "Z. Akhtar," dated January 6, 2006, as the last day worked for the week.

COUNT FORTY-ONE

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants of the crime of **CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, in violation of Penal Law § 170.25**, committed as follows:

The defendants, from about December 30, 2005 to about March 30, 2006, in the County of Westchester, with knowledge that it was forged and with intent to defraud, deceive and injure another, uttered and possessed a forged instrument, namely, a time sheet bearing the name "Z. Akhtar," dated December 30, 2005, as the last day worked for the week.

COUNT FORTY-TWO

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants of the crime of **CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, in violation of Penal Law § 170.25**, committed as follows:

The defendants, from about January 20, 2006 to about March 30, 2006, in the County of Westchester, with knowledge that it was forged and with intent to defraud, deceive and injure another, uttered and possessed a forged instrument, namely, a time sheet bearing the name "A Togni" for work done at Bainbridge Facility for week ending January 20, 2006.

COUNT FORTY-THREE

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants of the crime of **CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, in violation of Penal Law § 170.25**, committed as follows:

The defendants, from about January 20, 2006 to about March 30, 2006, in the County of Westchester, with knowledge that it was forged and with intent to defraud, deceive and injure another, uttered and possessed a forged instrument, namely, a time sheet bearing the name "A Togni" for work done at Southern Blvd. Day Care for week ending January 20, 2006.

COUNT FORTY-FOUR

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants of the crime of **CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, in violation of Penal Law § 170.25**, committed as follows:

The defendants, from about December 16, 2005 to about March 30, 2006, in the County of Westchester, with knowledge that it was forged and with intent to defraud, deceive and injure another, uttered and possessed a forged instrument, namely, a time sheet bearing the name "E Nyarko" for week ending December 16, 2005.

ANDREW M. CUOMO
Attorney General of the State of New York