

STATE OF NEW YORK : COUNTY OF ERIE
SUPREME COURT :

PEOPLE OF THE STATE OF NEW YORK

-against-

G. STEVEN PIGEON,
KRISTY MAZUREK, and
DAVID PFAFF

Defendants.

INDICTMENT

File No.: 00771-2017-001
(AG)

The **SPECIAL GRAND JURY OF THE COUNTY OF ERIE**, by this indictment,
accuses the defendants of the following crimes:

COUNT ONE

On or about August 6, 2013 through on or about September 9, 2013, in the Village of Lancaster, and elsewhere in the County of Erie, State of New York, the defendants, G. STEVEN PIGEON, KRISTY MAZUREK and DAVID PFAFF, committed the crime of **Election Law section 14-126 (5), a class E felony**, in that they, while acting on behalf of a candidate or a political committee, to wit, Candidate 1 or Friends of Candidate 1, knowingly and willfully solicited, organized or coordinated the formation of activities of one or more unauthorized committees, to wit, Western New York Progressive Caucus and Western New York Freedom, and made expenditures in connection with the nomination for election or election of Candidate 1, or solicited any person to make any such expenditures, for the purpose of evading the contribution limitations of Article 14 of the New York State Election Law.

COUNT TWO

On or about August 5, 2013 through on or about September 10, 2013, in the Village of Lancaster and elsewhere in the County of Erie, State of New York, the defendants, G. STEVEN PIGEON, KRISTY MAZUREK and DAVID PFAFF, committed the crime of **Election Law section 14-126(5), a class E felony**, in that they, while acting on behalf of a candidate or a political committee, to wit, Candidate 2 or Friends of Candidate 2, knowingly and willfully solicited, organized or coordinated the formation of activities of one or more unauthorized committees, to wit, Western New York Progressive Caucus, and made expenditures in connection with the nomination for election or election of Candidate 2, or solicited any person to make any such expenditures, for the purpose of evading the contribution limitations of Article 14 of the New York State Election Law.

Dated: _____

12/1/17

Foreperson



ERIC T. SCHNEIDERMAN,
ATTORNEY GENERAL
STATE OF NEW YORK

