

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 Q U E E N S

THE PEOPLE OF THE STATE OF NEW YORK,

AGAINST

X. VINCENT GRILLO
DEFENDANT

X. ARTHUR RIZZO
DEFENDANT

X. DAVID VEGA
DEFENDANT

X. JOHN GRILLO JR.
DEFENDANT

X. JOHN GRILLO SR.
DEFENDANT

X. ANDY PAUL MITRO
DEFENDANT

X. STEVEN DAVOLIO
DEFENDANT

X. JOHN FARRO
DEFENDANT

X. CHARLES LIGHTBODY
DEFENDANT

FILED:
INDICTMENT NO. 2504/2006

PL 460.20(1)(a)

ENTERPRISE CORRUPTION (1)

(VINCENT GRILLO)
(ARTHUR RIZZO)
(DAVID VEGA)
(JOHN GRILLO, JR.)
(JOHN GRILLO, SR.)
(ANDY PAUL MITRO)
(STEVEN DAVOLIO)
(JOHN FARRO)
(CHARLES LIGHTBODY)

PL 155.35	GRAND LARCENY IN THE THIRD DEGREE (2)	(VINCENT GRILLO) (ARTHUR RIZZO) (DAVID VEGA) (JOHN GRILLO, JR.) (ANDY PAUL MITRO) (STEVEN DAVOLIO)
PL 155.35	GRAND LARCENY IN THE THIRD DEGREE (3)	(VINCENT GRILLO) (ARTHUR RIZZO) (ANDY PAUL MITRO) (JOHN GRILLO, JR.)
PL 155.35	GRAND LARCENY IN THE THIRD DEGREE (4)	(VINCENT GRILLO) (ARTHUR RIZZO) (JOHN GRILLO, JR.) (STEVEN DAVOLIO)
PL 155.35	GRAND LARCENY IN THE THIRD DEGREE (5)	(VINCENT GRILLO) (ARTHUR RIZZO) (ANDY PAUL MITRO) (STEVEN DAVOLIO)
PL 155.35	GRAND LARCENY IN THE THIRD DEGREE (6)	(VINCENT GRILLO) (ARTHUR RIZZO) (ANDY PAUL MITRO)
PL 155.35	GRAND LARCENY IN THE THIRD DEGREE (7)	(VINCENT GRILLO) (ARTHUR RIZZO) (ANDY PAUL MITRO) (CHARLES LIGHTBODY)
PL 155.35	GRAND LARCENY IN THE THIRD DEGREE (8)	(VINCENT GRILLO) (ARTHUR RIZZO) (ANDY PAUL MITRO)
PL 155.35	GRAND LARCENY IN THE THIRD DEGREE (9)	(VINCENT GRILLO) (ARTHUR RIZZO) (DAVID VEGA) (ANDY PAUL MITRO)
PL 155.35	GRAND LARCENY IN THE THIRD DEGREE (10)	(VINCENT GRILLO) (ARTHUR RIZZO)

PL 155.35	GRAND LARCENY IN THE THIRD DEGREE (11)	(VINCENT GRILLO) (ARTHUR RIZZO) (DAVID VEGA) (JOHN GRILLO, SR.) (ANDY PAUL MITRO) (CHARLES LIGHTBODY)
PL 155.35	GRAND LARCENY IN THE THIRD DEGREE (12)	(VINCENT GRILLO) (ARTHUR RIZZO) (ANDY PAUL MITRO) (STEVEN DAVOLIO)
PL 155.35	GRAND LARCENY IN THE THIRD DEGREE (13)	(VINCENT GRILLO) (ARTHUR RIZZO) (JOHN GRILLO, SR.) (ANDY PAUL MITRO) (STEVEN DAVOLIO)
PL 155.35	GRAND LARCENY IN THE THIRD DEGREE (14)	(VINCENT GRILLO) (ARTHUR RIZZO) (ANDY PAUL MITRO) (STEVEN DAVOLIO)
PL 155.35	GRAND LARCENY IN THE THIRD DEGREE (15)	(VINCENT GRILLO) (ARTHUR RIZZO) (DAVID VEGA)
PL 155.35	GRAND LARCENY IN THE THIRD DEGREE (16)	(VINCENT GRILLO) (ARTHUR RIZZO) (DAVID VEGA) (JOHN FARRO)
PL 155.35	GRAND LARCENY IN THE THIRD DEGREE (17)	(VINCENT GRILLO) (ARTHUR RIZZO) (DAVID VEGA)
PL 155.35	GRAND LARCENY IN THE THIRD DEGREE (18)	(VINCENT GRILLO) (ARTHUR RIZZO) (DAVID VEGA) (JOHN FARRO)
PL 155.35	GRAND LARCENY IN THE THIRD DEGREE (19)	(VINCENT GRILLO) (ARTHUR RIZZO)

		(DAVID VEGA) (JOHN FARRO)
PL 155.35	GRAND LARCENY IN THE THIRD DEGREE (20)	(VINCENT GRILLO) (ARTHUR RIZZO) (DAVID VEGA) (ANDY PAUL MITRO) (CHARLES LIGHTBODY)
PL 155.35	GRAND LARCENY IN THE THIRD DEGREE (21)	(VINCENT GRILLO) (ARTHUR RIZZO) (DAVID VEGA) (JOHN FARRO)
PL 155.35	GRAND LARCENY IN THE THIRD DEGREE (22)	(VINCENT GRILLO) (ARTHUR RIZZO) (JOHN FARRO)
PL 155.35	GRAND LARCENY IN THE THIRD DEGREE (23)	(VINCENT GRILLO) (ARTHUR RIZZO) (DAVID VEGA)
PL 155.35	GRAND LARCENY IN THE THIRD DEGREE (24)	(VINCENT GRILLO) (ARTHUR RIZZO) (JOHN GRILLO, JR.) (JOHN GRILLO, SR.) (ANDY PAUL MITRO)
PL 155.35	GRAND LARCENY IN THE THIRD DEGREE (25)	(VINCENT GRILLO) (JOHN GRILLO, SR.)
PL 155.30	GRAND LARCENY IN THE FOURTH DEGREE (26-27)	(VINCENT GRILLO) (ARTHUR RIZZO) (DAVID VEGA)
PL 155.30	GRAND LARCENY IN THE FOURTH DEGREE (28)	(VINCENT GRILLO) (ARTHUR RIZZO) (CHARLES LIGHTBODY)
PL 190.65(1)	SCHEME TO DEFRAUD IN THE FIRST DEGREE (29)	(VINCENT GRILLO) (ARTHUR RIZZO)
PL 190.65(2)	SCHEME TO DEFRAUD IN THE FIRST DEGREE (30)	(VINCENT GRILLO) (ARTHUR RIZZO)

FIRST COUNT

ENTERPRISE CORRUPTION

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuses the defendants VINCENT GRILLO, ARTHUR RIZZO, DAVID VEGA, JOHN GRILLO, JR., JOHN GRILLO, SR., ANDY PAUL MITRO, JOHN FARRO, STEVEN DAVOLIO, and CHARLES LIGHTBODY of the crime of **ENTERPRISE CORRUPTION**, in violation of Penal Law Section 460.20(1)(a), committed in the County of Queens and elsewhere, as follows:

Defendants, from on or about April 1, 2006, to on or about December 7, 2006, having knowledge of the existence of a Criminal Enterprise, to wit: a Theft Ring (hereinafter "the Grillo & Rizzo Theft Enterprise"), and the nature of its activities, and being members of and associated with that Criminal Enterprise, intentionally conducted and participated in a pattern of criminal activity, as follows:

THE CRIMINAL ENTERPRISE

At all times relevant to the First Count:

1. Defendants VINCENT GRILLO, ARTHUR RIZZO, DAVID VEGA, JOHN GRILLO JR., JOHN GRILLO, SR., ANDY PAUL MITRO, JOHN FARRO, STEVEN DAVOLIO, and CHARLES LIGHTBODY, along with other persons known and unknown, were members of an enterprise which shared a common purpose of engaging in criminal conduct, and were associated in a structure that was distinct from the pattern of criminal activity and that had a continuity of existence, structure and criminal purpose beyond the scope of individual criminal incidents.

2. The defendants were members and associates of the Grillo & Rizzo Theft Enterprise, an organized criminal group that operated in

Queens County, and elsewhere.

3. The defendants VINCENT GRILLO AND ARTHUR RIZZO were the bosses of this enterprise. They impersonated law enforcement and financial representatives in order to obtain personal financial information to steal their victims identity and would then steal money and property from their victims in one of two ways. First, the enterprise would use the victims personal identification information to wire money to various locations and have members of the Grillo-Rizzo Theft Enterprise pose as family members of the victim and pickup the wire transfers. Second, the Grillo-Rizzo Theft Enterprise would use the personal information of the victim to shop at various department and retail stores and purchase merchandise which would be charged to the victim's credit card accounts. VINCENT GRILLO AND ARTHUR RIZZO as the bosses of the enterprise were also responsible for sending wire transfers and managing the shoppers' operations. In addition to settling disputes amongst their associates, they also distributed the money collected from the wire transfers and supervised the fencing of illegally purchased goods. The Grillo & Rizzo Theft Ring constituted a "Criminal Enterprise", as defined in Penal Law Section 460.10(3).

4. The defendants DAVID VEGA, JOHN GRILLO JR., JOHN GRILLO SR., ANDY PAUL MITRO, JOHN FARRO, STEVEN DAVOLIO, and CHARLES LIGHTBODY, along with other persons known and unknown, were associates of the Grillo & Rizzo Theft Enterprise.

THE PURPOSES OF THE CRIMINAL ENTERPRISE

The purpose of the Grillo & Rizzo Theft Enterprise includes the

following:

To acquire money illegally by engaging in a systematic scheme to defraud Queens County residents by obtaining their personal identification under false pretenses, and using this information to steal money and property from its victims in violation of Articles 190 and 155 of the New York State Penal Law.

THE STRUCTURE OF THE CRIMINAL ENTERPRISE

The Criminal Enterprise consists of the "bosses," the "runners," the "shoppers," and the "fence." During the pendency of the Criminal Enterprise, the bosses, VINCENT GRILLO AND ARTHUR RIZZO, solicited Queens County residents by engaging in a scheme where they utilize their wireless telephones to call up individuals whose names and phone numbers they already possess. In this scheme, generally, one of the two subjects, impersonated a law enforcement agent and tried to convince the person whom he called that the person's credit card had been utilized illegally and that they needed to rectify this situation. Grillo or Rizzo would then provide the person with a telephone number which he claimed belongs to Trans Union, a credit monitoring agency, but which in actuality belonged to the other boss not impersonating a law enforcement agent. When the victim called that number, Rizzo or Grillo impersonated a Trans-Union or other bank representative, thus giving the victim the belief that they were calling a legitimate telephone number. Having gained the trust of this person, Rizzo or Grillo was then able to obtain personal identification information from this person including such things as their credit card number, date of birth, social security

number, and mother's maiden name. Once this information was obtained, Grillo and Rizzo used this information generally in one of two ways to steal from the victim. First, Grillo and Rizzo would use the personal information they obtained to send money wire transfers to various locations, and provided this information to the runners. The "runners" DAVID VEGA, JOHN GRILLO JR., JOHN GRILLO SR., ANDY PAUL MITRO, JOHN FARRO, and STEVEN DAVOLIO, would pretend to be a relative of the victim and would go to the wire transfer locations and pick up the money that was sent via the wire transfer. This money would then be given to Grillo or Rizzo, who would keep a majority of the money and use the remainder to pay various members of the Identity Theft and Grand Larceny Enterprise for their work. The second way the Grillo-Rizzo Enterprise would steal from its victims was by shopping with the victims identity. Upon receiving the personal information from the victims, the "shoppers" ANDY PAUL MITRO, JOHN FARRO, AND STEVEN DAVOLIO, would use the victims' identities to purchase high-end electronics, watches, handbags, and other items from various department stores. These items would subsequently be purchased by the "shopper"/"fence" CHARLES LIGHTBODY who would provide the enterprise with cash for these items, as well as specifically pick out merchandise that he wanted during some of the shopping sprees.

PATTERN OF CRIMINAL ACTIVITY

During the period of this offense, each of the defendants, with intent to participate in and advance the affairs of the Criminal

Enterprise and pursuant to a common scheme and plan, engaged in conduct constituting or was criminally liable for the following criminal acts included within a pattern of criminal activity:

PATTERN ACT ONE

Defendants VINCENT GRILLO, ARTHUR RIZZO, DAVID VEGA, JOHN GRILLO, JR., ANDY PAUL MITRO, and STEVEN DAVOLIO, each aiding the other, and acting in concert, committed the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 in that on or about and between May 22, 2006 through June 8, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Malkit Multani.

PATTERN ACT TWO

Defendants VINCENT GRILLO, ARTHUR RIZZO, ANDY PAUL MITRO, and JOHN GRILLO, JR., each aiding the other and acting in concert, committed the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 in that on or about and between May 31, 2006 though June 6, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Abdul Rahim.

PATTERN ACT THREE

Defendants VINCENT GRILLO, ARTHUR RIZZO, STEVEN DAVOLIO, and JOHN GRILLO JR., each aiding the other and acting in concert, committed the

crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 in that on or about and between June 4, 2006 through June 10, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Quazi Hemayet (AKA Quaji Ali).

PATTERN ACT FOUR

Defendants VINCENT GRILLO, ARTHUR RIZZO, ANDY PAUL MITRO and, STEVEN DAVOLIO each aiding the other and acting in concert, committed the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 in that on or about and between June 7, 2006 through June 26, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Gurmit Singh.

PATTERN ACT FIVE

Defendants VINCENT GRILLO, ARTHUR RIZZO, and ANDY PAUL MITRO each aiding the other and acting in concert, committed the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 in that on or about and between June 10, 2006 through June 16, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Jaswinder Gill.

PATTERN ACT SIX

Defendants VINCENT GRILLO, ARTHUR RIZZO, ANDY PAUL MITRO, and

CHARLES LIGHTBODY each aiding the other and acting in concert, committed the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 in that on or about and between June 13, 2006 through July 29, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Argyrius Dontis.

PATTERN ACT SEVEN

Defendants VINCENT GRILLO, ARTHUR RIZZO, and ANDY PAUL MITRO each aiding the other and acting in concert, committed the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 in that on or about and between June 14, 2006 through June 20, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Gurbinder Singh.

PATTERN ACT EIGHT

Defendants VINCENT GRILLO, ARTHUR RIZZO, DAVID VEGA, and ANDY PAUL MITRO each aiding the other and acting in concert with other persons, committed the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 in that on or about and between June 17, 2006 through June 26, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Tariq Ahmed.

PATTERN ACT NINE

Defendants VINCENT GRILLO and ARTHUR RIZZO, each aiding the other and acting in concert, committed the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 in that on or about and between June 22, 2006 through June 29, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Elmira Akhtemov.

PATTERN ACT TEN

Defendants VINCENT GRILLO, ARTHUR RIZZO, DAVID VEGA, JOHN GRILLO, SR., ANDY PAUL MITRO, and CHARLES LIGHTBODY, each aiding the other and acting in concert with other persons, committed the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 in that on or about and between June 27, 2006 through July 19, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Robin Gill.

PATTERN ACT ELEVEN

Defendants VINCENT GRILLO, ARTHUR RIZZO, ANDY PAUL MITRO and STEVEN DAVOLIO, each aiding the other and acting in concert, committed the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 in that on or about and between June 23, 2006 through July 11, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Zahangir Kabir.

PATTERN ACT TWELVE

Defendants VINCENT GRILLO, ARTHUR RIZZO, JOHN GRILLO, SR., and ANDY PAUL MITRO, each aiding the other and acting in concert, committed the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 in that on or about and between June 27, 2006 through July 3, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Maryann Haray.

PATTERN ACT THIRTEEN

Defendants VINCENT GRILLO, ARTHUR RIZZO, ANDY PAUL MITRO, and STEVEN DAVOLIO each aiding the other and acting in concert, committed the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 in that on or about and between June 30, 2006 through July 31, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Alexander Gort.

PATTERN ACT FOURTEEN

Defendants VINCENT GRILLO, ARTHUR RIZZO, and DAVID VEGA, each aiding the other and acting in concert, committed the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 in that on or about and between July 3, 2006 through July 11, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States

currency from Mohammad Hossain.

PATTERN ACT FIFTEEN

Defendants VINCENT GRILLO, ARTHUR RIZZO, DAVID VEGA, and JOHN FARRO, each aiding the other and acting in concert, committed the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 in that on or about and between July 6, 2006 through July 16, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Mohinder Kareer.

PATTERN ACT SIXTEEN

Defendants VINCENT GRILLO, ARTHUR RIZZO, and DAVID VEGA, each aiding the other and acting in concert, committed the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 in that on or about and between July 12, 2006 through July 18, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Gulab Makhijani.

PATTERN ACT SEVENTEEN

Defendants VINCENT GRILLO, ARTHUR RIZZO, DAVID VEGA, and JOHN FARRO, each aiding the other and acting in concert, committed the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 in that on or about and between July 16, 2006, through July 22, 2006, in the County of Queens, stole certain property having an

aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Balvinder Singh.

PATTERN ACT EIGHTEEN

Defendants VINCENT GRILLO, ARTHUR RIZZO, DAVID VEGA, and JOHN FARRO each aiding the other and acting in concert, committed the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 in that on or about and between July 22, 2006, through July, 30, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Darshan Singh.

PATTERN ACT NINETEEN

Defendants VINCENT GRILLO, ARTHUR RIZZO, DAVID VEGA, ANDY PAUL MITRO, and CHARLES LIGHTBODY, each aiding the other and acting in concert, committed the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 in that on or about and between July 26, 2006, through August 19, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Alan Haseq (AKA Sultan Haseq).

PATTERN ACT TWENTY

Defendants VINCENT GRILLO, ARTHUR RIZZO, DAVID VEGA, and JOHN FARRO each aiding the other and acting in concert, committed the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 in that on or about and between August 11, 2006, through August 20, 2006,

in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Sushil Kumar.

PATTERN ACT TWENTY-ONE

Defendants VINCENT GRILLO, ARTHUR RIZZO, and JOHN FARRO, each aiding the other and acting in concert, committed the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 in that on or about and between August 14, 2006, through August, 21, 2006, in the County of Queens, stole property when the value of the property exceeded three thousand dollars to wit: stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Paramdeep Singh.

PATTERN ACT TWENTY-TWO

Defendants VINCENT GRILLO, ARTHUR RIZZO, and DAVID VEGA, each aiding the other and acting in concert, committed the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 in that on or about and between August 20, 2006, through August, 27, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Howard Mills.

PATTERN ACT TWENTY-THREE

Defendants VINCENT GRILLO, ARTHUR RIZZO, JOHN GRILLO, JR. JOHN GRILLO, SR., and ANDY PAUL MITRO, each aiding the other and acting in concert,

committed the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 in that on or about and between August 25, 2006, through September 1, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Dilipray Kothari.

PATTERN ACT TWENTY-FOUR

Defendants VINCENT GRILLO, ARTHUR RIZZO, and JOHN GRILLO, SR., each aiding the other and acting in concert, committed the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 in that on or about and between August, 22, 2006 through August 29, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Tapati Dey (AKA Bibash Dey).

PATTERN ACT TWENTY-FIVE

Defendants VINCENT GRILLO, ARTHUR RIZZO, and DAVID VEGA each aiding the other and acting in concert, committed the crime of **GRAND LARCENY IN THE FOURTH DEGREE** in violation of Penal Law Section 155.30 in that on or about and between August 1, 2006, through August 12, 2006 in the County of Queens, stole certain property having an aggregate value exceeding one thousand dollars, to wit: a sum of United States currency from Lakhwinder Singh.

PATTERN ACT TWENTY-SIX

Defendants VINCENT GRILLO, ARTHUR RIZZO, and DAVID VEGA, each

aiding the other and acting in concert, committed the crime of **GRAND LARCENY IN THE FOURTH DEGREE** in violation of Penal Law Section 155.30 in that on or about and between August 9, 2006, through August 20, 2006, in the County of Queens, stole certain property having an aggregate value exceeding one thousand dollars, to wit: a sum of United States currency from Shabbir Ahmad.

PATTERN ACT TWENTY-SEVEN

Defendants VINCENT GRILLO, ARTHUR RIZZO and CHARLES LIGHTBODY, each aiding the other and acting in concert, committed the crime of **GRAND LARCENY IN THE FOURTH DEGREE** in violation of Penal Law Section 155.30 in that on or about and between September 10, 2006 through September 16, 2006, in the County of Queens, stole certain property having an aggregate value exceeding one thousand dollars, to wit: a sum of United States currency from Renu Kumar.

PATTERN ACT TWENTY-EIGHT

Defendants DAVID VEGA, JOHN GRILLO JR., JOHN GRILLO SR., ANDY PAUL MITRO, JOHN FARRO, STEVEN DAVOLIO, and CHARLES LIGHTBODY, each aiding the other and acting in concert, committed the crime of **SCHEME TO DEFRAUD IN THE FIRST DEGREE** in violation of Penal Law Section 190.65(1) in that on or about and between April 1, 2006 through December 7, 2006, in the County of Queens, engaged in a scheme constituting of a systematic ongoing course of conduct, intended 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: to wit, a sum of united states currency from one or more persons.

PATTERN ACT TWENTY-NINE

Defendants DAVID VEGA, JOHN GRILLO JR., JOHN GRILLO SR., ANDY PAUL MITRO, JOHN FARRO, STEVEN DAVOLIO, and CHARLES LIGHTBODY, each aiding the other and acting in concert, committed the crime of **SCHEME TO DEFRAUD IN THE FIRST DEGREE** in violation of Penal Law Section 190.65(2) in that on or about and between April 1, 2006 through December 7, 2006, in the County of Queens, engaged in a scheme constituting of a systematic ongoing course of conduct, intended 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, to wit: a sum of united states currency from one or more persons.

PATTERN ACT THIRTY

Defendants VINCENT GRILLO, ARTHUR RIZZO, DAVID VEGA, and STEVEN DAVOLIO, each aiding the other and acting in concert, committed the crime of **CRIMINAL POSSESSION OF STOLEN PROPERTY IN THE FOURTH DEGREE** in violation of Penal Law Section 165.45, in that on or about and between May 22, 2006 through June 8, 2006, in the County of Queens, did knowingly possess stolen property, intended to benefit himself or a person other than an owner thereof to impede the recovery by an owner thereof and the property consisted of credit card, debit card or public

benefit card, to wit: a credit / debit card belonging to, and bearing the name of, Malkit Multanti.

PATTERN ACT THIRTY-ONE

Defendants VINCENT GRILLO, ARTHUR RIZZO, DAVID VEGA, and STEVEN DAVOLIO, each aiding the other and acting in concert, committed the crime of **CRIMINAL POSSESSION OF STOLEN PROPERTY IN THE FOURTH DEGREE** in violation of Penal Law Section 165.45, in that on or about and between May 22, 2006 through June 8, 2006, in the County of Queens, did knowingly possess stolen property, intended to benefit himself or a person other than an owner thereof to impede the recovery by an owner thereof and the property consisted of credit card, debit card or public benefit card, to wit: a credit / debit card belonging to, and bearing the name of, Malkit Multani.

PATTERN ACT THIRTY-TWO

Defendants VINCENT GRILLO, ARTHUR RIZZO, DAVID VEGA, and STEVEN DAVOLIO, each aiding the other and acting in concert, committed the crime of **CRIMINAL POSSESSION OF STOLEN PROPERTY IN THE FOURTH DEGREE** in violation of Penal Law Section 165.45, in that on or about and between May 22, 2006 through June 8, 2006, in the County of Queens, did knowingly possess stolen property, intended to benefit himself or a person other than an owner thereof to impede the recovery by an owner thereof and the property consisted of credit card, debit card or public benefit card, to wit: a credit / debit card belonging to, and bearing the name of, Malkit Multani.

PATTERN ACT THIRTY-THREE

Defendants VINCENT GRILLO, ARTHUR RIZZO, DAVID VEGA, ANDY PAUL MITRO, and STEVEN DAVOLIO each aiding the other and acting in concert, committed the crime of **CRIMINAL POSSESSION OF STOLEN PROPERTY IN THE FOURTH DEGREE** in violation of Penal Law Section 165.45, in that on or about and between June 17, 2006 through June 26, 2006, in the County of Queens, did knowingly possess stolen property, intended to benefit himself or a person other than an owner thereof to impede the recovery by an owner thereof and the property consisted of credit card, debit card or public benefit card to wit: a credit / debit card belonging to, and bearing the name of Tariq Ahmed.

PATTERN ACT THIRTY-FOUR

Defendants VINCENT GRILLO, ARTHUR RIZZO, DAVID VEGA, and ANDY PAUL MITRO, each aiding the other and acting in concert, committed the crime of **CRIMINAL POSSESSION OF STOLEN PROPERTY IN THE FOURTH DEGREE** in violation of Penal Law Section 165.45, in that on or about and between June 17, 2006 through June 26, 2006, in the County of Queens, did knowingly possess stolen property, intended to benefit himself or a person other than an owner thereof to impede the recovery by an owner thereof and the property consisted of credit card, debit card or public benefit card to wit: a credit / debit card belonging to, and bearing the name of Tariq Ahmed.

PATTERN ACT THIRTY-FIVE

Defendants VINCENT GRILLO, ARTHUR RIZZO, and DAVID VEGA each aiding the other and acting in concert, committed the crime of **CRIMINAL POSSESSION OF STOLEN PROPERTY IN THE FOURTH DEGREE** in violation of Penal Law Section 165.45, in that on or about and between July 20, 2006 through July 30, 2006, in the County of Queens, did knowingly possess stolen property, intended to benefit himself or a person other than an owner thereof to impede the recovery by an owner thereof and the property consisted of credit card, debit card or public benefit card to wit: a credit / debit card belonging to, and bearing the name of Darshan Singh.

PATTERN ACT THIRTY-SIX

Defendants VINCENT GRILLO, ARTHUR RIZZO, and DAVID VEGA each aiding the other and acting in concert, committed the crime of **CRIMINAL POSSESSION OF STOLEN PROPERTY IN THE FOURTH DEGREE** in violation of Penal Law Section 165.45, in that on or about and between July 20, 2006, to on or about July 30, 2006, in the County of Queens, did knowingly possess stolen property, intended to benefit himself or a person other than an owner thereof to impede the recovery by an owner thereof and the property consisted of credit card, debit card or public benefit card to wit: a credit / debit card belonging to, and bearing the name of Darshan Singh.

PATTERN ACT THIRTY-SEVEN

Defendants VINCENT GRILLO, ARTHUR RIZZO, and DAVID VEGA each aiding the

other and acting in concert, committed the crime of **CRIMINAL POSSESSION OF STOLEN PROPERTY IN THE FOURTH DEGREE** in violation of Penal Law Section 165.45, in that on or about and between July 20, 2006 through July 30, 2006, in the County of Queens, did knowingly possess stolen property, intended to benefit himself or a person other than an owner thereof to impede the recovery by an owner thereof and the property consisted of credit card, debit card or public benefit card to wit: a credit / debit card belonging to, and bearing the name of, Darshan Singh.

PATTERN ACT THIRTY-EIGHT

Defendants VINCENT GRILLO, ARTHUR RIZZO, DAVID VEGA, JOHN GRILLO, JR., JOHN GRILLO, SR., ANDY PAUL MITRO, STEVEN DAVOLIO, JOHN FARRO, and CHARLES LIGHTBODY each aiding the other and acting in concert, committed the crime of **CONSPIRACY IN THE FIFTH DEGREE** in violation of Penal Law Section 105.05(1), in that from on or about and between April 1, 2006 through December 7, 2006, in the County of Queens, with intent that conduct constituting a felony be performed, to wit: Grand Larceny in the Fourth Degree, agreed with one or more persons to engage in or cause the performance of such conduct.

It was the purpose of this conspiracy to acquire money illegally by engaging in a systematic scheme to defraud Queens County residents by obtaining their personal identification information under false pretenses, and using this information to steal money and property from the victims and thereby commit Grand Larceny in the Fourth Degree.

As part of the conspiracy, VINCENT GRILLO and ARTHUR RIZZO were the

bosses of the operation, impersonated law enforcement to acquire personal identification from the victims, and would utilize this information generally in one of two ways to steal money and/or property from the victims. First, VINCENT GRILLO and ARTHUR RIZZO would obtain the personal identification information from the victims and utilize this information to send wire transfers to various locations; DAVID VEGA, JOHN GRILLO, SR., JOHN GRILLO, JR., ANDY PAUL MITRO, STEVEN DAVOLIO as the "runners" would impersonate a family member of the victim, and go to the wire transfer locations and pick up the money that was sent via wire transfer. Second, VINCENT GRILLO and ARTHUR RIZZO would obtain the personal identification information from the victims and provide that information to the shoppers ANDY PAUL MITRO, STEVEN DAVOLIO and, JOHN FARRO who would use the victims' identities to purchase high-end electronics and other items from various department stores. These items would subsequently be purchased by the "shopper"/"fence" CHARLES LIGHTBODY who would provide the enterprise with cash for these items, as well as specifically pick out merchandise that he wanted during some of the shopping sprees.

OVERT ACTS

In furtherance of said conspiracy and to effect the objects thereof, and during the course thereof, the following overt acts, among others, were committed:

1. On or about and between April 1, 2006 through December 7,

2006, in the County of Queens, and elsewhere, defendants VINCENT GRILLO and ARTHUR RIZZO pretended to be law enforcement officers and representatives from Transunion, a credit reporting agency, in order to acquire personal identification from the conspiracy victims.

2. On or about and between, May 20, 2006 through June 8, 2006, in the County of Queens, and elsewhere, defendants VINCENT GRILLO, ARTHUR RIZZO, DAVID VEGA and STEVEN DAVOLIO were in possession of stolen property, to wit: credit / debit cards belonging to, and bearing the name of Malkit Multani.

3. On or about May 26, 2006, in the County of Queens, and elsewhere, defendants JOHN GRILLO, JR. and ANDY PAUL MITRO picked up wire transfers of currency which were sent utilizing the stolen credit / debit cards belonging to, and bearing the name of Malkit Multani.

4. On or about June 7, 2006, defendant STEVEN DAVOLIO picked up wire transfers of currency sent using the Queens County resident victim, Quazi Hemayet's Discover Card account.

5. On or about and between June 27, 2006 through July 19, 2006, in the County of Queens, and elsewhere, defendants ANDY PAUL MITRO shopped using the victim Robin Gill's identity to purchase products.

6. On or about and between, June 27, 2006 through July 19, 2006, defendant CHARLES LIGHTBODY purchased the stolen products purchased in the name of Robin Gill by giving a sum of United States currency to the shoppers in order to provide funding for further criminal acts.

7. On or about August 28, 2006, in the County of Queens, defendants JOHN GRILLO JR. and JOHN GRILLO, SR., were present inside

75-35 31st Street, County of Queens, where they picked up wire transfers of currency sent from the credit/ debit card accounts of the victim Dilprey Kothari.

SECOND COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO, ARTHUR RIZZO, DAVID VEGA, JOHN GRILLO, JR., ANDY PAUL MITRO, and STEVEN DAVOLIO of the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 committed as follows:

The defendants, each aiding the other and acting in concert, on or about and between May 22, 2006 though June 8, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Malkit Multani.

THIRD COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO, ARTHUR RIZZO, ANDY PAUL MITRO, and JOHN GRILLO, JR., of the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 committed as follows:

The defendants, each aiding the other and acting in concert, on or about and between, May 31, 2006 though June 6, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Abdul Rahim (AKA Bibi Rahim).

FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO, ARTHUR RIZZO, JOHN GRILLO, JR., and STEVEN DAVOLIO of the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 committed as follows:

The defendants, each aiding the other and acting in concert, on or about and between, June 4, 2006 through June 10, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Quazi Hemayet (AKA Ali Quaji).

FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO, ARTHUR RIZZO, ANDY PAUL MITRO, and STEVEN DAVOLIO, of the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 committed as follows:

The defendants, each aiding the other and acting in concert, on or about and between, June 7, 2006 through June 26, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Gurmit Singh.

SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO, ARTHUR RIZZO, and ANDY PAUL MITRO, of the

crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 committed as follows:

The defendants, each aiding the other and acting in concert, on or about and between, June 10, 2006 through June 16, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Jaswinder Gill.

SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO, ARTHUR RIZZO, ANDY PAUL MITRO, and CHARLES LIGHTBODY of the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 committed as follows:

The defendants, each aiding the other and acting in concert, on or about and between, June 13, 2006 through July 29, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Argyrius Dontis.

EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO, ARTHUR RIZZO, and ANDY PAUL MITRO, of the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 committed as follows:

The defendants, each aiding the other and acting in concert, on or about and between, June 14, 2006 through June 21, 2006, in the County of

Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Gurbinder Singh.

NINTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO, ARTHUR RIZZO, DAVID VEGA, and ANDY PAUL MITRO of the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 committed as follows:

The defendants, each aiding the other and acting in concert with other persons, on or about and between, June 17, 2006 through June 26, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Tariq Ahmed.

TENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO and ARTHUR RIZZO of the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 committed as follows:

The defendants, each aiding the other and acting in concert, on or about and between, June 22, 2006 through June 29, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Elmira Akhtemov.

ELEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO, ARTHUR RIZZO, DAVID VEGA, JOHN GRILLO, SR., ANDY PAUL MITRO, and CHARLES LIGHTBODY of the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 committed as follows:

The defendants, each aiding the other and acting in concert with other persons, on or about and between, June 27, 2006 through July 19, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Robin Gill.

TWELFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO, ARTHUR RIZZO, ANDY PAUL MITRO and STEVEN DAVOLIO of the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 committed as follows:

The defendants, each aiding the other and acting in concert, on or about and between, June 23, 2006 through July 11, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Zahangir Kabir.

THIRTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO, ARTHUR RIZZO, JOHN GRILLO, SR., and ANDY

PAUL MITRO of the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 committed as follows:

The defendants, each aiding the other and acting in concert, on or about and between, June 27, 2006 through July 3, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Maryann Haray.

FOURTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO, ARTHUR RIZZO, ANDY PAUL MITRO, and STEVEN DAVOLIO of the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 committed as follows:

The defendants, each aiding the other and acting in concert, on or about and between, June 30, 2006 through July 31, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Alexander Gort.

FIFTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO, ARTHUR RIZZO, and DAVID VEGA, of the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 committed as follows:

The defendants, each aiding the other and acting in concert, on or about and between, July 3, 2006 through July 11, 2006, in the County of

Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Mohammad Hossain.

SIXTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO, ARTHUR RIZZO, DAVID VEGA, and JOHN FARRO of the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 committed as follows:

The defendants, each aiding the other and acting in concert, on or about and between, July 6, 2006 through July 16, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Mohinder Kareer.

SEVENTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO, ARTHUR RIZZO, and DAVID VEGA, of the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 committed as follows:

The defendants, each aiding the other and acting in concert, on or about and between, July 12, 2006 through July 19, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Gulab Makhijani.

EIGHTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO, ARTHUR RIZZO, DAVID VEGA, and JOHN FARRO, of the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 committed as follows:

The defendants, each aiding the other and acting in concert, on or about and between, July 16, 2006 through July 21, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Balvinder Singh.

NINETEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO, ARTHUR RIZZO, DAVID VEGA, and JOHN FARRO of the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 committed as follows:

The defendants, each aiding the other and acting in concert, on or about and between, July 22, 2006, through July 30, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Darshan Singh.

TWENTIETH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO, ARTHUR RIZZO, DAVID VEGA, and ANDY PAUL MITRO, and CHARLES LIGHTBODY, of the crime of **GRAND LARCENY IN THE THIRD**

DEGREE in violation of Penal Law Section 155.35 committed as follows:

The defendants, each aiding the other and acting in concert, on or about and between, July 26, 2006, through August 19, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Alan Haseq (AKA Sultan Haseq).

TWENTY-FIRST COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO, ARTHUR RIZZO, DAVID VEGA, and JOHN FARRO, of the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 committed as follows:

The defendants, each aiding the other and acting in concert, on or about and between, August 11, 2006, through August 20, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Sushil Kumar.

TWENTY-SECOND COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO, ARTHUR RIZZO, and JOHN FARRO, of the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 committed as follows:

The defendants, each aiding the other and acting in concert, on or about and between, August 14, 2006, through August 21, 2006, in the County of Queens, stole certain property having an aggregate value

exceeding three thousand dollars, to wit: a sum of United States currency from Paramdeep Singh.

TWENTY-THIRD COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO, ARTHUR RIZZO, and DAVID VEGA, of the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 committed as follows:

The defendants, each aiding the other and acting in concert, on or about and between, August 20, 2006, through August 27, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Howard Mills.

TWENTY-FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO, ARTHUR RIZZO, JOHN GRILLO, JR., JOHN GRILLO, SR., and ANDY PAUL MITRO of the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 committed as follows:

The defendants, each aiding the other and acting in concert, on or about and between, August 25, 2006, through September 1, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Dilipray Kothari.

TWENTY-FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO and JOHN GRILLO, SR., of the crime of **GRAND LARCENY IN THE THIRD DEGREE** in violation of Penal Law Section 155.35 committed as follows:

The defendants, each aiding the other and acting in concert, on or about and between, August 22, 2006 through August 29, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Tapati Dey.

TWENTY-SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO, ARTHUR RIZZO, and DAVID VEGA of the crime of **GRAND LARCENY IN THE FOURTH DEGREE** in violation of Penal Law Section 155.30 committed as follows:

The defendants, each aiding the other and acting in concert, on or about and between, August 1, 2006, through August 12, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Lakwinder Singh.

TWENTY-SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO, ARTHUR RIZZO, and DAVID VEGA, of the crime of **GRAND LARCENY IN THE FOURTH DEGREE** in violation of Penal Law

Section 155.30 committed as follows:

The defendants, each aiding the other and acting in concert, on or about and between, August 9, 2006, through August 20, 2006, in the County of Queens, stole certain property having an aggregate value exceeding one thousand dollars, to wit: a sum of United States currency from Shabbir Ahmad.

TWENTY-EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO, ARTHUR RIZZO and CHARLES LIGHTBODY of the crime of **GRAND LARCENY IN THE FOURTH DEGREE** in violation of Penal Law Section 155.30 committed as follows:

The defendant, acting in concert, on or about and between, September 10, 2006 through September 16, 2006, in the County of Queens, stole certain property having an aggregate value exceeding three thousand dollars, to wit: a sum of United States currency from Renu Kumar.

TWENTY-NINTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants, VINCENT GRILLO and ARTHUR RIZZO of the crime of **SCHEME TO DEFRAUD IN THE FIRST DEGREE** in violation of Penal Law Section 190.65(1) committed as follows:

Defendants each aiding the other and acting in concert, on or about and between April 1, 2006 through December 7, 2006, in the County of

Queens, engaged in a scheme constituting of a systematic ongoing course of conduct, intended 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: to wit, a sum of United States currency from one or more persons.

THIRTIETH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO and ARTHUR RIZZO of the crime of **SCHEME TO DEFRAUD IN THE FIRST DEGREE** in violation of Penal Law Section 190.65(2) committed as follows:

The defendants each aiding the other and acting in concert, on or about and between April 1, 2006 through December 7, 2006, in the County of Queens, engaged in a scheme constituting of a systematic ongoing course of conduct, intended 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, to wit: a sum of united states currency from one or more persons.

THIRTY-FIRST COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO, ARTHUR RIZZO, DAVID VEGA, and STEVEN DAVOLIO of the crime of **CRIMINAL POSSESSION OF STOLEN PROPERTY IN THE FOURTH DEGREE** in violation of Penal Law Section 165.45 committed as

follows:

The defendants, aiding each other and acting in concert, on or about and between May 22, 2006 through June 8, 2006, in the County of Queens, did knowingly possess stolen property, intended to benefit himself or a person other than an owner thereof to impede the recovery by an owner thereof and the property consisted of credit card, debit card or public benefit card to wit: A credit / debit card belonging to, and bearing the name of Malkit Multani.

THIRTY-SECOND COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO, ARTHUR RIZZO, DAVID VEGA, and STEVEN DAVOLIO of the crime of **CRIMINAL POSSESSION OF STOLEN PROPERTY IN THE FOURTH DEGREE** in violation of Penal Law Section 165.45 committed as follows:

The defendants, aiding each other and acting in concert, on or about and between May 22, 2006 through June 8, 2006, in the County of Queens, did knowingly possess stolen property, intended to benefit himself or a person other than an owner thereof to impede the recovery by an owner thereof and the property consisted of credit card, debit card or public benefit card to wit: A credit / debit card belonging to, and bearing the name of Malkit Multani.

THIRTY-THIRD COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO, ARTHUR RIZZO, DAVID VEGA, and STEVEN

DAVOLIO of the crime of **CRIMINAL POSSESSION OF STOLEN PROPERTY IN THE FOURTH DEGREE** in violation of Penal Law Section 165.45 committed as follows:

The defendants, aiding each other and acting in concert, on or about and between May 22, 2006 through June 8, 2006, in the County of Queens, did knowingly possess stolen property, intended to benefit himself or a person other than an owner thereof to impede the recovery by an owner thereof and the property consisted of credit card, debit card or public benefit card to wit: A credit / debit card belonging to, and bearing the name of Malkit Multani.

THIRTY-FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO, ARTHUR RIZZO, DAVID VEGA, and, ANDY PAUL MITRO of the crime of **CRIMINAL POSSESSION OF STOLEN PROPERTY IN THE FOURTH DEGREE** in violation of Penal Law Section 165.45 committed as follows:

The defendants, aiding each other and acting in concert with other persons, on or about and between June 17, 2006 through June 26, 2006, in the County of Queens, did knowingly possess stolen property, intended to benefit himself or a person other than an owner thereof to impede the recovery by an owner thereof and the property consisted of credit card, debit card or public benefit card to wit: a credit / debit card belonging to, and bearing the name of Tariq Ahmed.

THIRTY-FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO, ARTHUR RIZZO, DAVID VEGA, and, ANDY PAUL MITRO of the crime of **CRIMINAL POSSESSION OF STOLEN PROPERTY IN THE FOURTH DEGREE** in violation of Penal Law Section 165.45 committed as follows:

The defendants, aiding each other and acting in concert with other persons, on or about and between June 17, 2006 through June 26, 2006, in the County of Queens, did knowingly possess stolen property, intended to benefit himself or a person other than an owner thereof to impede the recovery by an owner thereof and the property consisted of credit card, debit card or public benefit card to wit: a credit / debit card belonging to, and bearing the name of Tariq Ahmed.

THIRTY-SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO, ARTHUR RIZZO, and DAVID VEGA, of the crime of **CRIMINAL POSSESSION OF STOLEN PROPERTY IN THE FOURTH DEGREE** in violation of Penal Law Section 165.45 committed as follows:

The defendants, aiding each other and acting in concert, on or about and between July 20, 2006 through July 30, 2006, in the County of Queens, did knowingly possess stolen property, intended to benefit himself or a person other than an owner thereof to impede the recovery by an owner thereof and the property consisted of credit card, debit card or public benefit card to wit: a credit / debit card belonging to, and bearing the name of Darshan Singh.

THIRTY-SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO, ARTHUR RIZZO, and DAVID VEGA, of the crime of **CRIMINAL POSSESSION OF STOLEN PROPERTY IN THE FOURTH DEGREE** in violation of Penal Law Section 165.45 committed as follows:

The defendants, aiding each other and acting in concert, on or about and between July 20, 2006, through July 30, 2006, in the County of Queens, did knowingly possess stolen property, intended to benefit himself or a person other than an owner thereof to impede the recovery by an owner thereof and the property consisted of a credit card, debit card or public benefit card to wit: A credit / debit card belonging to, and bearing the name of Darshan Singh.

THIRTY-EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO, ARTHUR RIZZO, and DAVID VEGA, of the crime of **CRIMINAL POSSESSION OF STOLEN PROPERTY IN THE FOURTH DEGREE** in violation of Penal Law Section 165.45 committed as follows:

The defendants, aiding each other and acting in concert, on or about and between July 20, 2006 through July 30, 2006, in the County of Queens, did knowingly possess stolen property, intended to benefit himself or a person other than an owner thereof to impede the recovery by an owner thereof and the property consisted of credit card, debit card or public benefit card to wit: a credit / debit card belonging to, and bearing the name of Darshan Singh.

THIRTY-NINTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuse the defendants VINCENT GRILLO, ARTHUR RIZZO, DAVID VEGA, JOHN GRILLO, JR., JOHN GRILLO SR., ANDY PAUL MITRO, STEVEN DAVOLIO, JOHN FARRO, and CHARLES LIGHTBODY of the crime of **CONSPIRACY IN THE FIFTH DEGREE** in violation of Penal Law Section 105.05(1) committed as follows:

The defendants, each aiding the other and acting in concert with other persons, in on or about and between April 1, 2006 through December 7, 2006, in the County of Queens, with intent that conduct constituting a felony be performed, to wit: Grand Larceny and Criminal Possession of Stolen Property in the Fourth Degree, agreed with one or more persons to engage in or cause the performance of such conduct.

It was the purpose of this conspiracy to acquire money illegally by engaging in a systematic scheme to defraud Queens County residents by obtaining their personal identification under false pretenses, and using this information to commit grand larceny.

As part of the conspiracy, VINCENT GRILLO and ARTHUR RIZZO managed the operation, impersonated law enforcement to acquire personal identification from the victims, and would utilize this information to send wire transfers to various locations, they collected and distributed the proceeds of the operation; DAVID VEGA, JOHN GRILLO SR., JOHN GRILLO JR., ANDY PAUL MITRO, STEVEN DAVOLIO as the "runners" would use the victims' identities and go to the wire transfer locations and pick up the money that was sent via wire transfer; ANDY PAUL MITRO STEVEN DAVOLIO and, JOHN FARRO as "shoppers" would use the victims' identities to purchase high-end electronics and other items from various department

stores, and CHARLES LIGHTBODY acted as the "fence" by selecting the items that he wanted the enterprise to purchase, and subsequently purchasing these items substantially below cost.

OVERT ACTS

In furtherance of said conspiracy and to effect the objects thereof, and during the course thereof, the following overt acts, among others, were committed:

1. On or about and between April 1, 2006 through December 7, 2006, in the County of Queens, defendants VINCENT GRILLO and ARTHUR RIZZO pretended to be law enforcement officers and representatives from Transunion, a credit reporting agency, in order to acquire personal identification from the conspiracy victims.

2. On or about and between, May 20, 2006 through June 8, 2006, in the County of Queens, defendants VINCENT GRILLO, ARTHUR RIZZO, DAVID VEGA and STEVEN DAVOLIO were in possession of stolen property, to wit: credit / debit cards belonging to, and bearing the name of Malkit Multani.

3. On or about May 26, 2006, in the County of Queens, defendants JOHN GRILLO, JR. and ANDY PAUL MITRO picked up wire transfers of currency which were sent utilizing the stolen credit / debit cards belonging to, and bearing the name of Malkit Multani.

4. On or about June 7, 2006, defendant STEVEN DAVOLIO picked up wire transfers of currency sent using the Queens County resident victim, Quazi Hemayets's Discover Card account.

5. On or about and between June 27, 2006 through July 19, 2006, in the County of Queens, defendants ANDY PAUL MITRO shopped using the victim Robin Gill's identity to purchase products.

6. On or about and between, June 27, 2006 through July 19, 2006, in the County of Queens, defendant CHARLES LIGHTBODY purchased the stolen products purchased in the name of Robin Gill by giving a sum of United States currency to the shoppers in order to provide funding for further criminal acts.

7. On or about August 28, 2006, in the County of Queens, defendants JOHN GRILLO JR. and JOHN GRILLO, SR., were present inside 75-35 31st Street, County of Queens, where they picked up wire transfers of currency sent from the credit/ debit card accounts of the victim Dilprey Kothari.

DISTRICT ATTORNEY