

INDICTMENT

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

THE PEOPLE OF THE STATE OF NEW YORK

AGAINST

DEAN S. MUSTAPHALLI,
DEFENDANT

FILED:
INDICTMENT NO.
559/2018

PL 155.40-1	GRAND LARCENY IN THE SECOND DEGREE (1-18)
PL 155.35-1	GRAND LARCENY IN THE THIRD DEGREE (19)
PL 170.10-1	FORGERY IN THE SECOND DEGREE (20-31)
PL 170.25	CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE (32-54)
PL 175.10	FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE (55-76)
GBL 352-C(6) ART 23A	VIOLATION OF GENERAL BUSINESS LAW SECTION 352-C(6) (77-97)
PL 190.65-1a	SCHEME TO DEFRAUD IN THE FIRST DEGREE (98)
PL 190.65-1b	SCHEME TO DEFRAUD IN THE FIRST DEGREE (99)

A TRUE BILL

FOREPERSON

ATTORNEY GENERAL

FIRST COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GRAND LARCENY IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 27, 2015, IN THE COUNTY OF QUEENS, STOLE PROPERTY HAVING AN AGGREGATE VALUE EXCEEDING FIFTY THOUSAND DOLLARS FROM A PERSON KNOWN TO THE GRAND JURY, HEREINAFTER REFERRED TO AS WITNESS ONE.

SECOND COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GRAND LARCENY IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 8, 2015, IN THE COUNTY OF QUEENS, STOLE PROPERTY HAVING AN AGGREGATE VALUE EXCEEDING FIFTY THOUSAND DOLLARS FROM A PERSON KNOWN TO THE GRAND JURY, HEREINAFTER REFERRED TO AS WITNESS TWO.

THIRD COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GRAND LARCENY IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT AND BETWEEN MAY 11, 2015 AND JUNE 19, 2015, IN THE COUNTY OF QUEENS, STOLE PROPERTY HAVING AN AGGREGATE VALUE EXCEEDING FIFTY THOUSAND DOLLARS FROM A PERSON KNOWN TO THE GRAND JURY, HEREINAFTER REFERRED TO AS WITNESS THREE.

FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GRAND LARCENY IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 28, 2015, IN THE COUNTY OF QUEENS, STOLE PROPERTY HAVING AN AGGREGATE VALUE EXCEEDING FIFTY THOUSAND DOLLARS FROM A PERSON KNOWN TO THE GRAND JURY, HEREINAFTER REFERRED TO AS WITNESS FOUR.

FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GRAND LARCENY IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT AND BETWEEN APRIL 17, 2015 AND MAY 11, 2015, IN THE COUNTY OF QUEENS, STOLE PROPERTY HAVING AN AGGREGATE VALUE EXCEEDING FIFTY THOUSAND DOLLARS FROM A

PERSON KNOWN TO THE GRAND JURY, HEREINAFTER REFERRED TO AS WITNESS FIVE.

SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GRAND LARCENY IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT MAY 22, 2015, IN THE COUNTY OF QUEENS, STOLE PROPERTY HAVING AN AGGREGATE VALUE EXCEEDING FIFTY THOUSAND DOLLARS FROM A PERSON KNOWN TO THE GRAND JURY, HEREINAFTER REFERRED TO AS WITNESS SIX.

SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GRAND LARCENY IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT AND BETWEEN APRIL 15, 2015 AND JUNE 17, 2015, IN THE COUNTY OF QUEENS, STOLE PROPERTY HAVING AN AGGREGATE VALUE EXCEEDING FIFTY THOUSAND DOLLARS FROM A PERSON KNOWN TO THE GRAND JURY, HEREINAFTER REFERRED TO AS WITNESS SEVEN.

EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GRAND LARCENY IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 6, 2015, IN THE COUNTY OF QUEENS, STOLE PROPERTY HAVING AN AGGREGATE VALUE EXCEEDING FIFTY THOUSAND DOLLARS FROM A PERSON KNOWN TO THE GRAND JURY, HEREINAFTER REFERRED TO AS WITNESS EIGHT.

NINTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GRAND LARCENY IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT AND BETWEEN MAY 29, 2015 AND JUNE 9, 2015, IN THE COUNTY OF QUEENS, STOLE PROPERTY HAVING AN AGGREGATE VALUE EXCEEDING FIFTY THOUSAND DOLLARS FROM A PERSON KNOWN TO THE GRAND JURY, HEREINAFTER REFERRED TO AS WITNESS NINE.

TENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GRAND LARCENY IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT AND BETWEEN MARCH 23, 2015 AND OCTOBER 19, 2015, IN THE COUNTY OF QUEENS, STOLE PROPERTY HAVING AN AGGREGATE VALUE EXCEEDING FIFTY THOUSAND DOLLARS FROM A PERSON KNOWN TO THE GRAND JURY, HEREINAFTER REFERRED TO AS WITNESS TEN.

ELEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GRAND LARCENY IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT AND BETWEEN APRIL 14, 2015 AND MAY 22, 2015, IN THE COUNTY OF QUEENS, STOLE PROPERTY HAVING AN AGGREGATE VALUE EXCEEDING FIFTY THOUSAND DOLLARS FROM A PERSON KNOWN TO THE GRAND JURY, HEREINAFTER REFERRED TO AS WITNESS ELEVEN.

TWELFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GRAND LARCENY IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT MAY 8, 2015, IN THE COUNTY OF QUEENS, STOLE PROPERTY HAVING AN AGGREGATE VALUE EXCEEDING

FIFTY THOUSAND DOLLARS FROM A PERSON KNOWN TO THE GRAND JURY,
HEREINAFTER REFERRED TO AS WITNESS TWELVE.

THIRTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT,
ACCUSES THE DEFENDANT OF GRAND LARCENY IN THE SECOND DEGREE,
COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT MAY 11, 2015, IN THE COUNTY OF
QUEENS, STOLE PROPERTY HAVING AN AGGREGATE VALUE EXCEEDING
FIFTY THOUSAND DOLLARS FROM A PERSON KNOWN TO THE GRAND JURY,
HEREINAFTER REFERRED TO AS WITNESS THIRTEEN.

FOURTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT,
ACCUSES THE DEFENDANT OF GRAND LARCENY IN THE SECOND DEGREE,
COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT MAY 12, 2015, IN THE COUNTY OF
QUEENS, STOLE PROPERTY HAVING AN AGGREGATE VALUE EXCEEDING
FIFTY THOUSAND DOLLARS FROM A PERSON KNOWN TO THE GRAND JURY,
HEREINAFTER AS REFERRED TO WITNESS FOURTEEN.

FIFTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GRAND LARCENY IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 28, 2015, IN THE COUNTY OF QUEENS, STOLE PROPERTY HAVING AN AGGREGATE VALUE EXCEEDING FIFTY THOUSAND DOLLARS FROM A PERSON KNOWN TO THE GRAND JURY, HEREINAFTER REFERRED TO AS WITNESS FIFTEEN.

SIXTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GRAND LARCENY IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT MAY 18, 2015, IN THE COUNTY OF QUEENS, STOLE PROPERTY HAVING AN AGGREGATE VALUE EXCEEDING FIFTY THOUSAND DOLLARS FROM A PERSON KNOWN TO THE GRAND JURY, HEREINAFTER REFERRED TO AS WITNESS SIXTEEN.

SEVENTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GRAND LARCENY IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT AND BETWEEN APRIL 14, 2015 AND APRIL 28, 2015, IN THE COUNTY OF QUEENS, STOLE PROPERTY HAVING AN AGGREGATE VALUE EXCEEDING FIFTY THOUSAND DOLLARS FROM A PERSON KNOWN TO THE GRAND JURY, HEREINAFTER REFERRED TO AS WITNESS SEVENTEEN.

EIGHTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GRAND LARCENY IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT JUNE 3, 2015, IN THE COUNTY OF QUEENS, STOLE PROPERTY HAVING AN AGGREGATE VALUE EXCEEDING FIFTY THOUSAND DOLLARS FROM A PERSON KNOWN TO THE GRAND JURY, HEREINAFTER REFERRED TO AS WITNESS EIGHTEEN.

NINETEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GRAND LARCENY IN THE THIRD DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 10, 2015, IN THE COUNTY OF QUEENS, STOLE PROPERTY HAVING AN AGGREGATE VALUE IN EXCESS OF THREE THOUSAND DOLLARS FROM PERSONS KNOWN TO THE GRAND JURY, HEREINAFTER REFERRED TO AS WITNESSES NINETEEN AND TWENTY.

TWENTIETH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT,
ACCUSES THE DEFENDANT OF FORGERY IN THE SECOND DEGREE,
COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT JUNE 27, 2014, IN THE COUNTY OF
QUEENS, WITH INTENT TO DEFRAUD, DECEIVE OR INJURE ANOTHER,
FALSELY MADE, COMPLETED OR ALTERED A WRITTEN INSTRUMENT WHICH
IS OR PURPORTS TO BE, OR WHICH IS CALCULATED TO BECOME OR TO
REPRESENT IF COMPLETED, A DEED, WILL, CODICIL, CONTRACT,
ASSIGNMENT, COMMERCIAL INSTRUMENT, CREDIT CARD OR OTHER
INSTRUMENT WHICH DOES OR MAY EVIDENCE, CREATE, TRANSFER,
TERMINATE OR OTHERWISE AFFECT A LEGAL RIGHT, INTEREST,
OBLIGATION OR STATUS, TO WIT: A DISCRETIONARY TRADING
AUTHORIZATION AGREEMENT FOR ADVISOR AND REQUEST TO SEND
TRADE CONFIRMATIONS AND ACCOUNT STATEMENTS TO ADVISOR FOR
WITNESS SEVEN, RELATED TO ACCOUNT ENDING 7670.

TWENTY-FIRST COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT,
ACCUSES THE DEFENDANT OF FORGERY IN THE SECOND DEGREE,
COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT JUNE 27, 2014, IN THE COUNTY OF
QUEENS, WITH INTENT TO DEFRAUD, DECEIVE OR INJURE ANOTHER,

FALSELY MADE, COMPLETED OR ALTERED A WRITTEN INSTRUMENT WHICH IS OR PURPORTS TO BE, OR WHICH IS CALCULATED TO BECOME OR TO REPRESENT IF COMPLETED, A DEED, WILL, CODICIL, CONTRACT, ASSIGNMENT, COMMERCIAL INSTRUMENT, CREDIT CARD OR OTHER INSTRUMENT WHICH DOES OR MAY EVIDENCE, CREATE, TRANSFER, TERMINATE OR OTHERWISE AFFECT A LEGAL RIGHT, INTEREST, OBLIGATION OR STATUS, TO WIT: AN INTERACTIVE BROKERS LLC CUSTOMER AGREEMENT FOR WITNESS SEVEN, RELATED TO ACCOUNT ENDING 7670.

TWENTY-SECOND COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF FORGERY IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT JUNE 27, 2014, IN THE COUNTY OF QUEENS, WITH INTENT TO DEFRAUD, DECEIVE OR INJURE ANOTHER, FALSELY MADE, COMPLETED OR ALTERED A WRITTEN INSTRUMENT WHICH IS OR PURPORTS TO BE, OR WHICH IS CALCULATED TO BECOME OR TO REPRESENT IF COMPLETED, A DEED, WILL, CODICIL, CONTRACT, ASSIGNMENT, COMMERCIAL INSTRUMENT, CREDIT CARD OR OTHER INSTRUMENT WHICH DOES OR MAY EVIDENCE, CREATE, TRANSFER, TERMINATE OR OTHERWISE AFFECT A LEGAL RIGHT, INTEREST, OBLIGATION OR STATUS, TO WIT: REGULATORY INFORMATION AND

ADDITIONAL PROVISIONS FOR USERS FROM HONG KONG AND USERS
TRADING ON HONG KONG EXCHANGES FOR WITNESS SEVEN, RELATED TO
ACCOUNT ENDING 7670.

TWENTY-THIRD COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT,
ACCUSES THE DEFENDANT OF FORGERY IN THE SECOND DEGREE,
COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT JUNE 27, 2014, IN THE COUNTY OF
QUEENS, WITH INTENT TO DEFRAUD, DECEIVE OR INJURE ANOTHER,
FALSELY MADE, COMPLETED OR ALTERED A WRITTEN INSTRUMENT WHICH
IS OR PURPORTS TO BE, OR WHICH IS CALCULATED TO BECOME OR TO
REPRESENT IF COMPLETED, A DEED, WILL, CODICIL, CONTRACT,
ASSIGNMENT, COMMERCIAL INSTRUMENT, CREDIT CARD OR OTHER
INSTRUMENT WHICH DOES OR MAY EVIDENCE, CREATE, TRANSFER,
TERMINATE OR OTHERWISE AFFECT A LEGAL RIGHT, INTEREST,
OBLIGATION OR STATUS, TO WIT: A DISCRETIONARY TRADING
AUTHORIZATION AGREEMENT FOR ADVISOR AND REQUEST TO SEND
TRADE CONFIRMATIONS AND ACCOUNT STATEMENTS TO ADVISOR FOR
WITNESS SEVEN, RELATED TO ACCOUNT ENDING 7695.

TWENTY-FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT,
ACCUSES THE DEFENDANT OF FORGERY IN THE SECOND DEGREE,
COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT JUNE 27, 2014, IN THE COUNTY OF
QUEENS, WITH INTENT TO DEFRAUD, DECEIVE OR INJURE ANOTHER,
FALSELY MADE, COMPLETED OR ALTERED A WRITTEN INSTRUMENT WHICH
IS OR PURPORTS TO BE, OR WHICH IS CALCULATED TO BECOME OR TO
REPRESENT IF COMPLETED, A DEED, WILL, CODICIL, CONTRACT,
ASSIGNMENT, COMMERCIAL INSTRUMENT, CREDIT CARD OR OTHER
INSTRUMENT WHICH DOES OR MAY EVIDENCE, CREATE, TRANSFER,
TERMINATE OR OTHERWISE AFFECT A LEGAL RIGHT, INTEREST,
OBLIGATION OR STATUS, TO WIT: INTERACTIVE BROKERS LLC CUSTOMER
AGREEMENT INDIVIDUAL RETIREMENT ACCOUNT FOR WITNESS SEVEN,
RELATED TO ACCOUNT ENDING 7695.

TWENTY-FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT,
ACCUSES THE DEFENDANT OF FORGERY IN THE SECOND DEGREE,
COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT JUNE 27, 2014, IN THE COUNTY OF
QUEENS, WITH INTENT TO DEFRAUD, DECEIVE OR INJURE ANOTHER,
FALSELY MADE, COMPLETED OR ALTERED A WRITTEN INSTRUMENT WHICH

IS OR PURPORTS TO BE, OR WHICH IS CALCULATED TO BECOME OR TO REPRESENT IF COMPLETED, A DEED, WILL, CODICIL, CONTRACT, ASSIGNMENT, COMMERCIAL INSTRUMENT, CREDIT CARD OR OTHER INSTRUMENT WHICH DOES OR MAY EVIDENCE, CREATE, TRANSFER, TERMINATE OR OTHERWISE AFFECT A LEGAL RIGHT, INTEREST, OBLIGATION OR STATUS, TO WIT: INTERACTIVE BROKERS LLC CUSTOMER AGREEMENT INDIVIDUAL RETIREMENT ACCOUNT FOR WITNESS FOURTEEN, RELATED TO ACCOUNT ENDING 7478.

TWENTY-SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF FORGERY IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT JUNE 27, 2014, IN THE COUNTY OF QUEENS, WITH INTENT TO DEFRAUD, DECEIVE OR INJURE ANOTHER, FALSELY MADE, COMPLETED OR ALTERED A WRITTEN INSTRUMENT WHICH IS OR PURPORTS TO BE, OR WHICH IS CALCULATED TO BECOME OR TO REPRESENT IF COMPLETED, A DEED, WILL, CODICIL, CONTRACT, ASSIGNMENT, COMMERCIAL INSTRUMENT, CREDIT CARD OR OTHER INSTRUMENT WHICH DOES OR MAY EVIDENCE, CREATE, TRANSFER, TERMINATE OR OTHERWISE AFFECT A LEGAL RIGHT, INTEREST, OBLIGATION OR STATUS, TO WIT: A DISCRETIONARY TRADING AUTHORIZATION AGREEMENT FOR ADVISOR AND REQUEST TO SEND

TRADE CONFIRMATIONS AND ACCOUNT STATEMENTS TO ADVISOR FOR
WITNESS FOURTEEN, RELATED TO ACCOUNT ENDING 7478.

TWENTY-SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT,
ACCUSES THE DEFENDANT OF FORGERY IN THE SECOND DEGREE,
COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT JUNE 16, 2014, IN THE COUNTY OF
QUEENS, WITH INTENT TO DEFRAUD, DECEIVE OR INJURE ANOTHER,
FALSELY MADE, COMPLETED OR ALTERED A WRITTEN INSTRUMENT WHICH
IS OR PURPORTS TO BE, OR WHICH IS CALCULATED TO BECOME OR TO
REPRESENT IF COMPLETED, A DEED, WILL, CODICIL, CONTRACT,
ASSIGNMENT, COMMERCIAL INSTRUMENT, CREDIT CARD OR OTHER
INSTRUMENT WHICH DOES OR MAY EVIDENCE, CREATE, TRANSFER,
TERMINATE OR OTHERWISE AFFECT A LEGAL RIGHT, INTEREST,
OBLIGATION OR STATUS, TO WIT: A DISCRETIONARY TRADING
AUTHORIZATION AGREEMENT FOR ADVISOR AND REQUEST TO SEND
TRADE CONFIRMATIONS AND ACCOUNT STATEMENTS TO ADVISOR FOR
WITNESS FIFTEEN, RELATED TO ACCOUNT ENDING 2801.

TWENTY-EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT,
ACCUSES THE DEFENDANT OF FORGERY IN THE SECOND DEGREE,
COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT JUNE 16, 2014, IN THE COUNTY OF
QUEENS, WITH INTENT TO DEFRAUD, DECEIVE OR INJURE ANOTHER,
FALSELY MADE, COMPLETED OR ALTERED A WRITTEN INSTRUMENT WHICH
IS OR PURPORTS TO BE, OR WHICH IS CALCULATED TO BECOME OR TO
REPRESENT IF COMPLETED, A DEED, WILL, CODICIL, CONTRACT,
ASSIGNMENT, COMMERCIAL INSTRUMENT, CREDIT CARD OR OTHER
INSTRUMENT WHICH DOES OR MAY EVIDENCE, CREATE, TRANSFER,
TERMINATE OR OTHERWISE AFFECT A LEGAL RIGHT, INTEREST,
OBLIGATION OR STATUS, TO WIT: AN INTERACTIVE BROKERS LLC
CUSTOMER AGREEMENT INDIVIDUAL RETIREMENT ACCOUNT FOR WITNESS
FIFTEEN, RELATED TO ACCOUNT ENDING 2801.

TWENTY-NINTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT,
ACCUSES THE DEFENDANT OF FORGERY IN THE SECOND DEGREE,
COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT JUNE 16, 2014, IN THE COUNTY OF
QUEENS, WITH INTENT TO DEFRAUD, DECEIVE OR INJURE ANOTHER,
FALSELY MADE, COMPLETED OR ALTERED A WRITTEN INSTRUMENT WHICH

IS OR PURPORTS TO BE, OR WHICH IS CALCULATED TO BECOME OR TO REPRESENT IF COMPLETED, A DEED, WILL, CODICIL, CONTRACT, ASSIGNMENT, COMMERCIAL INSTRUMENT, CREDIT CARD OR OTHER INSTRUMENT WHICH DOES OR MAY EVIDENCE, CREATE, TRANSFER, TERMINATE OR OTHERWISE AFFECT A LEGAL RIGHT, INTEREST, OBLIGATION OR STATUS, TO WIT: A DISCRETIONARY TRADING AUTHORIZATION AGREEMENT FOR ADVISOR AND REQUEST TO SEND TRADE CONFIRMATIONS AND ACCOUNT STATEMENTS TO ADVISOR FOR WITNESS SEVENTEEN, RELATED TO ACCOUNT ENDING 2780.

THIRTIETH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF FORGERY IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT JUNE 16, 2014, IN THE COUNTY OF QUEENS, WITH INTENT TO DEFRAUD, DECEIVE OR INJURE ANOTHER, FALSELY MADE, COMPLETED OR ALTERED A WRITTEN INSTRUMENT WHICH IS OR PURPORTS TO BE, OR WHICH IS CALCULATED TO BECOME OR TO REPRESENT IF COMPLETED, A DEED, WILL, CODICIL, CONTRACT, ASSIGNMENT, COMMERCIAL INSTRUMENT, CREDIT CARD OR OTHER INSTRUMENT WHICH DOES OR MAY EVIDENCE, CREATE, TRANSFER, TERMINATE OR OTHERWISE AFFECT A LEGAL RIGHT, INTEREST, OBLIGATION OR STATUS, TO WIT: AN INTERACTIVE BROKERS LLC

CUSTOMER AGREEMENT INDIVIDUAL RETIREMENT ACCOUNT FOR WITNESS SEVENTEEN, RELATED TO ACCOUNT ENDING 2780.

THIRTY-FIRST COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF FORGERY IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT JUNE 17, 2014, IN THE COUNTY OF QUEENS, WITH INTENT TO DEFRAUD, DECEIVE OR INJURE ANOTHER, FALSELY MADE, COMPLETED OR ALTERED A WRITTEN INSTRUMENT WHICH IS OR PURPORTS TO BE, OR WHICH IS CALCULATED TO BECOME OR TO REPRESENT IF COMPLETED, A DEED, WILL, CODICIL, CONTRACT, ASSIGNMENT, COMMERCIAL INSTRUMENT, CREDIT CARD OR OTHER INSTRUMENT WHICH DOES OR MAY EVIDENCE, CREATE, TRANSFER, TERMINATE OR OTHERWISE AFFECT A LEGAL RIGHT, INTEREST, OBLIGATION OR STATUS, TO WIT: A DISCRETIONARY TRADING AUTHORIZATION AGREEMENT FOR ADVISOR AND REQUEST TO SEND TRADE CONFIRMATIONS AND ACCOUNT STATEMENTS TO ADVISOR FOR A PERSON KNOWN TO THE GRAND JURY, HEREINAFTER REFERRED TO AS WITNESS TWENTY-ONE, RELATED TO ACCOUNT ENDING 3272.

THIRTY-SECOND COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 7, 2015, IN THE COUNTY OF QUEENS, WITH KNOWLEDGE THAT IT WAS FORGED AND WITH INTENT TO DEFRAUD, DECEIVE OR INJURE ANOTHER, FALSELY MADE, UTTERED OR POSSESSED A WRITTEN INSTRUMENT WHICH IS OR PURPORTS TO BE, OR WHICH IS CALCULATED TO BECOME OR TO REPRESENT IF COMPLETED, A DEED, WILL, CODICIL, CONTRACT, ASSIGNMENT, COMMERCIAL INSTRUMENT, CREDIT CARD OR OTHER INSTRUMENT WHICH DOES OR MAY EVIDENCE, CREATE, TRANSFER, TERMINATE OR OTHERWISE AFFECT A LEGAL RIGHT, INTEREST, OBLIGATION OR STATUS, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS ONE, IN THE AMOUNT OF ONE HUNDRED THOUSAND DOLLARS.

THIRTY-THIRD COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 2, 2015, IN THE COUNTY OF QUEENS, WITH KNOWLEDGE THAT IT WAS FORGED AND WITH INTENT TO DEFRAUD, DECEIVE OR INJURE ANOTHER, FALSELY MADE, UTTERED OR

POSSESSED A WRITTEN INSTRUMENT WHICH IS OR PURPORTS TO BE, OR WHICH IS CALCULATED TO BECOME OR TO REPRESENT IF COMPLETED, A DEED, WILL, CODICIL, CONTRACT, ASSIGNMENT, COMMERCIAL INSTRUMENT, CREDIT CARD OR OTHER INSTRUMENT WHICH DOES OR MAY EVIDENCE, CREATE, TRANSFER, TERMINATE OR OTHERWISE AFFECT A LEGAL RIGHT, INTEREST, OBLIGATION OR STATUS, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS TWO, IN THE AMOUNT OF ONE HUNDRED THOUSAND DOLLARS.

THIRTY-FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 28, 2015, IN THE COUNTY OF QUEENS, WITH KNOWLEDGE THAT IT WAS FORGED AND WITH INTENT TO DEFRAUD, DECEIVE OR INJURE ANOTHER, FALSELY MADE, UTTERED OR POSSESSED A WRITTEN INSTRUMENT WHICH IS OR PURPORTS TO BE, OR WHICH IS CALCULATED TO BECOME OR TO REPRESENT IF COMPLETED, A DEED, WILL, CODICIL, CONTRACT, ASSIGNMENT, COMMERCIAL INSTRUMENT, CREDIT CARD OR OTHER INSTRUMENT WHICH DOES OR MAY EVIDENCE, CREATE, TRANSFER, TERMINATE OR OTHERWISE AFFECT A LEGAL RIGHT, INTEREST, OBLIGATION OR STATUS, TO WIT: MUSTAPHALLI

CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS
THREE, IN THE AMOUNT OF SIXTY THOUSAND DOLLARS.

THIRTY-FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT,
ACCUSES THE DEFENDANT OF CRIMINAL POSSESSION OF A FORGED
INSTRUMENT IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 28, 2015, IN THE COUNTY OF
QUEENS, WITH KNOWLEDGE THAT IT WAS FORGED AND WITH INTENT TO
DEFRAUD, DECEIVE OR INJURE ANOTHER, FALSELY MADE, UTTERED OR
POSSESSED A WRITTEN INSTRUMENT WHICH IS OR PURPORTS TO BE, OR
WHICH IS CALCULATED TO BECOME OR TO REPRESENT IF COMPLETED, A
DEED, WILL, CODICIL, CONTRACT, ASSIGNMENT, COMMERCIAL
INSTRUMENT, CREDIT CARD OR OTHER INSTRUMENT WHICH DOES OR MAY
EVIDENCE, CREATE, TRANSFER, TERMINATE OR OTHERWISE AFFECT A
LEGAL RIGHT, INTEREST, OBLIGATION OR STATUS, TO WIT: MUSTAPHALLI
CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS
THREE, IN THE AMOUNT OF TWENTY-ONE THOUSAND FIVE HUNDRED
EIGHTY DOLLARS.

THIRTY-SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 28, 2015, IN THE COUNTY OF QUEENS, WITH KNOWLEDGE THAT IT WAS FORGED AND WITH INTENT TO DEFRAUD, DECEIVE OR INJURE ANOTHER, FALSELY MADE, UTTERED OR POSSESSED A WRITTEN INSTRUMENT WHICH IS OR PURPORTS TO BE, OR WHICH IS CALCULATED TO BECOME OR TO REPRESENT IF COMPLETED, A DEED, WILL, CODICIL, CONTRACT, ASSIGNMENT, COMMERCIAL INSTRUMENT, CREDIT CARD OR OTHER INSTRUMENT WHICH DOES OR MAY EVIDENCE, CREATE, TRANSFER, TERMINATE OR OTHERWISE AFFECT A LEGAL RIGHT, INTEREST, OBLIGATION OR STATUS, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS THREE, IN THE AMOUNT OF FIVE THOUSAND DOLLARS.

THIRTY-SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 3, 2015, IN THE COUNTY OF QUEENS, WITH KNOWLEDGE THAT IT WAS FORGED AND WITH INTENT TO DEFRAUD, DECEIVE OR INJURE ANOTHER, FALSELY MADE, UTTERED OR

POSSESSED A WRITTEN INSTRUMENT WHICH IS OR PURPORTS TO BE, OR WHICH IS CALCULATED TO BECOME OR TO REPRESENT IF COMPLETED, A DEED, WILL, CODICIL, CONTRACT, ASSIGNMENT, COMMERCIAL INSTRUMENT, CREDIT CARD OR OTHER INSTRUMENT WHICH DOES OR MAY EVIDENCE, CREATE, TRANSFER, TERMINATE OR OTHERWISE AFFECT A LEGAL RIGHT, INTEREST, OBLIGATION OR STATUS, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS FOUR, IN THE AMOUNT OF ONE HUNDRED SIXTY THOUSAND DOLLARS.

THIRTY-EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 16, 2015, IN THE COUNTY OF QUEENS, WITH KNOWLEDGE THAT IT WAS FORGED AND WITH INTENT TO DEFRAUD, DECEIVE OR INJURE ANOTHER, FALSELY MADE, UTTERED OR POSSESSED A WRITTEN INSTRUMENT WHICH IS OR PURPORTS TO BE, OR WHICH IS CALCULATED TO BECOME OR TO REPRESENT IF COMPLETED, A DEED, WILL, CODICIL, CONTRACT, ASSIGNMENT, COMMERCIAL INSTRUMENT, CREDIT CARD OR OTHER INSTRUMENT WHICH DOES OR MAY EVIDENCE, CREATE, TRANSFER, TERMINATE OR OTHERWISE AFFECT A LEGAL RIGHT, INTEREST, OBLIGATION OR STATUS, TO WIT: MUSTAPHALLI

CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS FIVE, IN THE AMOUNT OF ONE HUNDRED THOUSAND DOLLARS.

THIRTY-NINTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 16, 2015, IN THE COUNTY OF QUEENS, WITH KNOWLEDGE THAT IT WAS FORGED AND WITH INTENT TO DEFRAUD, DECEIVE OR INJURE ANOTHER, FALSELY MADE, UTTERED OR POSSESSED A WRITTEN INSTRUMENT WHICH IS OR PURPORTS TO BE, OR WHICH IS CALCULATED TO BECOME OR TO REPRESENT IF COMPLETED, A DEED, WILL, CODICIL, CONTRACT, ASSIGNMENT, COMMERCIAL INSTRUMENT, CREDIT CARD OR OTHER INSTRUMENT WHICH DOES OR MAY EVIDENCE, CREATE, TRANSFER, TERMINATE OR OTHERWISE AFFECT A LEGAL RIGHT, INTEREST, OBLIGATION OR STATUS, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS FIVE, IN THE AMOUNT OF NINETY-THREE THOUSAND DOLLARS.

FORTIETH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 16, 2015, IN THE COUNTY OF QUEENS, WITH KNOWLEDGE THAT IT WAS FORGED AND WITH INTENT TO DEFRAUD, DECEIVE OR INJURE ANOTHER, FALSELY MADE, UTTERED OR POSSESSED A WRITTEN INSTRUMENT WHICH IS OR PURPORTS TO BE, OR WHICH IS CALCULATED TO BECOME OR TO REPRESENT IF COMPLETED, A DEED, WILL, CODICIL, CONTRACT, ASSIGNMENT, COMMERCIAL INSTRUMENT, CREDIT CARD OR OTHER INSTRUMENT WHICH DOES OR MAY EVIDENCE, CREATE, TRANSFER, TERMINATE OR OTHERWISE AFFECT A LEGAL RIGHT, INTEREST, OBLIGATION OR STATUS, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS SIX, IN THE AMOUNT OF ONE HUNDRED TEN THOUSAND DOLLARS.

FORTY-FIRST COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT MARCH 23, 2015, IN THE COUNTY OF QUEENS, WITH KNOWLEDGE THAT IT WAS FORGED AND WITH INTENT TO DEFRAUD, DECEIVE OR INJURE ANOTHER, FALSELY MADE, UTTERED OR POSSESSED A WRITTEN INSTRUMENT WHICH IS OR PURPORTS TO BE, OR WHICH IS CALCULATED TO BECOME OR TO REPRESENT IF COMPLETED, A DEED, WILL, CODICIL, CONTRACT, ASSIGNMENT, COMMERCIAL INSTRUMENT, CREDIT CARD OR OTHER INSTRUMENT WHICH DOES OR MAY

EVIDENCE, CREATE, TRANSFER, TERMINATE OR OTHERWISE AFFECT A
LEGAL RIGHT, INTEREST, OBLIGATION OR STATUS, TO WIT: MUSTAPHALLI
CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS
EIGHT, IN THE AMOUNT OF ONE HUNDRED TEN THOUSAND DOLLARS.

FORTY-SECOND COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT,
ACCUSES THE DEFENDANT OF CRIMINAL POSSESSION OF A FORGED
INSTRUMENT IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT MARCH 23, 2015, IN THE COUNTY OF
QUEENS, WITH KNOWLEDGE THAT IT WAS FORGED AND WITH INTENT TO
DEFRAUD, DECEIVE OR INJURE ANOTHER, FALSELY MADE, UTTERED OR
POSSESSED A WRITTEN INSTRUMENT WHICH IS OR PURPORTS TO BE, OR
WHICH IS CALCULATED TO BECOME OR TO REPRESENT IF COMPLETED, A
DEED, WILL, CODICIL, CONTRACT, ASSIGNMENT, COMMERCIAL
INSTRUMENT, CREDIT CARD OR OTHER INSTRUMENT WHICH DOES OR MAY
EVIDENCE, CREATE, TRANSFER, TERMINATE OR OTHERWISE AFFECT A
LEGAL RIGHT, INTEREST, OBLIGATION OR STATUS, TO WIT: MUSTAPHALLI
CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS
TEN, IN THE AMOUNT OF SEVEN HUNDRED EIGHTY THOUSAND DOLLARS.

FORTY-THIRD COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 6, 2015, IN THE COUNTY OF QUEENS, WITH KNOWLEDGE THAT IT WAS FORGED AND WITH INTENT TO DEFRAUD, DECEIVE OR INJURE ANOTHER, FALSELY MADE, UTTERED OR POSSESSED A WRITTEN INSTRUMENT WHICH IS OR PURPORTS TO BE, OR WHICH IS CALCULATED TO BECOME OR TO REPRESENT IF COMPLETED, A DEED, WILL, CODICIL, CONTRACT, ASSIGNMENT, COMMERCIAL INSTRUMENT, CREDIT CARD OR OTHER INSTRUMENT WHICH DOES OR MAY EVIDENCE, CREATE, TRANSFER, TERMINATE OR OTHERWISE AFFECT A LEGAL RIGHT, INTEREST, OBLIGATION OR STATUS, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS ELEVEN, IN THE AMOUNT OF EIGHTY-FOUR THOUSAND DOLLARS.

FORTY-FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 6, 2015, IN THE COUNTY OF QUEENS, WITH KNOWLEDGE THAT IT WAS FORGED AND WITH INTENT TO DEFRAUD, DECEIVE OR INJURE ANOTHER, FALSELY MADE, UTTERED OR

POSSESSED A WRITTEN INSTRUMENT WHICH IS OR PURPORTS TO BE, OR WHICH IS CALCULATED TO BECOME OR TO REPRESENT IF COMPLETED, A DEED, WILL, CODICIL, CONTRACT, ASSIGNMENT, COMMERCIAL INSTRUMENT, CREDIT CARD OR OTHER INSTRUMENT WHICH DOES OR MAY EVIDENCE, CREATE, TRANSFER, TERMINATE OR OTHERWISE AFFECT A LEGAL RIGHT, INTEREST, OBLIGATION OR STATUS, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS ELEVEN, IN THE AMOUNT OF THIRTY-SIX THOUSAND FIVE HUNDRED TWENTY-SEVEN DOLLARS.

FORTY-FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 7, 2015, IN THE COUNTY OF QUEENS, WITH KNOWLEDGE THAT IT WAS FORGED AND WITH INTENT TO DEFRAUD, DECEIVE OR INJURE ANOTHER, FALSELY MADE, UTTERED OR POSSESSED A WRITTEN INSTRUMENT WHICH IS OR PURPORTS TO BE, OR WHICH IS CALCULATED TO BECOME OR TO REPRESENT IF COMPLETED, A DEED, WILL, CODICIL, CONTRACT, ASSIGNMENT, COMMERCIAL INSTRUMENT, CREDIT CARD OR OTHER INSTRUMENT WHICH DOES OR MAY EVIDENCE, CREATE, TRANSFER, TERMINATE OR OTHERWISE AFFECT A LEGAL RIGHT, INTEREST, OBLIGATION OR STATUS, TO WIT: MUSTAPHALLI

CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS
TWELVE, IN THE AMOUNT OF SEVENTY THOUSAND DOLLARS.

FORTY-SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT,
ACCUSES THE DEFENDANT OF CRIMINAL POSSESSION OF A FORGED
INSTRUMENT IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 3, 2015, IN THE COUNTY OF
QUEENS, WITH KNOWLEDGE THAT IT WAS FORGED AND WITH INTENT TO
DEFRAUD, DECEIVE OR INJURE ANOTHER, FALSELY MADE, UTTERED OR
POSSESSED A WRITTEN INSTRUMENT WHICH IS OR PURPORTS TO BE, OR
WHICH IS CALCULATED TO BECOME OR TO REPRESENT IF COMPLETED, A
DEED, WILL, CODICIL, CONTRACT, ASSIGNMENT, COMMERCIAL
INSTRUMENT, CREDIT CARD OR OTHER INSTRUMENT WHICH DOES OR MAY
EVIDENCE, CREATE, TRANSFER, TERMINATE OR OTHERWISE AFFECT A
LEGAL RIGHT, INTEREST, OBLIGATION OR STATUS, TO WIT: MUSTAPHALLI
CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS
FIFTEEN, IN THE AMOUNT OF TWO HUNDRED NINETY-FIVE THOUSAND
DOLLARS.

FORTY-SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 6, 2015, IN THE COUNTY OF QUEENS, WITH KNOWLEDGE THAT IT WAS FORGED AND WITH INTENT TO DEFRAUD, DECEIVE OR INJURE ANOTHER, FALSELY MADE, UTTERED OR POSSESSED A WRITTEN INSTRUMENT WHICH IS OR PURPORTS TO BE, OR WHICH IS CALCULATED TO BECOME OR TO REPRESENT IF COMPLETED, A DEED, WILL, CODICIL, CONTRACT, ASSIGNMENT, COMMERCIAL INSTRUMENT, CREDIT CARD OR OTHER INSTRUMENT WHICH DOES OR MAY EVIDENCE, CREATE, TRANSFER, TERMINATE OR OTHERWISE AFFECT A LEGAL RIGHT, INTEREST, OBLIGATION OR STATUS, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS SIXTEEN, IN THE AMOUNT OF SEVENTY THOUSAND DOLLARS.

FORTY-EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 3, 2015, IN THE COUNTY OF QUEENS, WITH KNOWLEDGE THAT IT WAS FORGED AND WITH INTENT TO DEFRAUD, DECEIVE OR INJURE ANOTHER, FALSELY MADE, UTTERED OR

POSSESSED A WRITTEN INSTRUMENT WHICH IS OR PURPORTS TO BE, OR WHICH IS CALCULATED TO BECOME OR TO REPRESENT IF COMPLETED, A DEED, WILL, CODICIL, CONTRACT, ASSIGNMENT, COMMERCIAL INSTRUMENT, CREDIT CARD OR OTHER INSTRUMENT WHICH DOES OR MAY EVIDENCE, CREATE, TRANSFER, TERMINATE OR OTHERWISE AFFECT A LEGAL RIGHT, INTEREST, OBLIGATION OR STATUS, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS SEVENTEEN, IN THE AMOUNT OF TWO HUNDRED SIXTY THOUSAND DOLLARS.

FORTY-NINTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 3, 2015, IN THE COUNTY OF QUEENS, WITH KNOWLEDGE THAT IT WAS FORGED AND WITH INTENT TO DEFRAUD, DECEIVE OR INJURE ANOTHER, FALSELY MADE, UTTERED OR POSSESSED A WRITTEN INSTRUMENT WHICH IS OR PURPORTS TO BE, OR WHICH IS CALCULATED TO BECOME OR TO REPRESENT IF COMPLETED, A DEED, WILL, CODICIL, CONTRACT, ASSIGNMENT, COMMERCIAL INSTRUMENT, CREDIT CARD OR OTHER INSTRUMENT WHICH DOES OR MAY EVIDENCE, CREATE, TRANSFER, TERMINATE OR OTHERWISE AFFECT A LEGAL RIGHT, INTEREST, OBLIGATION OR STATUS, TO WIT: MUSTAPHALLI

CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS SEVENTEEN, IN THE AMOUNT OF THIRTY-SIX THOUSAND NINE HUNDRED SEVENTY DOLLARS.

FIFTIETH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 9, 2015, IN THE COUNTY OF QUEENS, WITH KNOWLEDGE THAT IT WAS FORGED AND WITH INTENT TO DEFRAUD, DECEIVE OR INJURE ANOTHER, FALSELY MADE, UTTERED OR POSSESSED A WRITTEN INSTRUMENT WHICH IS OR PURPORTS TO BE, OR WHICH IS CALCULATED TO BECOME OR TO REPRESENT IF COMPLETED, A DEED, WILL, CODICIL, CONTRACT, ASSIGNMENT, COMMERCIAL INSTRUMENT, CREDIT CARD OR OTHER INSTRUMENT WHICH DOES OR MAY EVIDENCE, CREATE, TRANSFER, TERMINATE OR OTHERWISE AFFECT A LEGAL RIGHT, INTEREST, OBLIGATION OR STATUS, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS EIGHTEEN, IN THE AMOUNT OF FIFTY-FIVE THOUSAND DOLLARS.

FIFTY-FIRST COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 3, 2015, IN THE COUNTY OF QUEENS, WITH KNOWLEDGE THAT IT WAS FORGED AND WITH INTENT TO DEFRAUD, DECEIVE OR INJURE ANOTHER, FALSELY MADE, UTTERED OR POSSESSED A WRITTEN INSTRUMENT WHICH IS OR PURPORTS TO BE, OR WHICH IS CALCULATED TO BECOME OR TO REPRESENT IF COMPLETED, A DEED, WILL, CODICIL, CONTRACT, ASSIGNMENT, COMMERCIAL INSTRUMENT, CREDIT CARD OR OTHER INSTRUMENT WHICH DOES OR MAY EVIDENCE, CREATE, TRANSFER, TERMINATE OR OTHERWISE AFFECT A LEGAL RIGHT, INTEREST, OBLIGATION OR STATUS, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS NINETEEN, IN THE AMOUNT OF THIRTY-FIVE THOUSAND DOLLARS.

FIFTY-SECOND COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 10, 2015, IN THE COUNTY OF QUEENS, WITH KNOWLEDGE THAT IT WAS FORGED AND WITH INTENT TO DEFRAUD, DECEIVE OR INJURE ANOTHER, FALSELY MADE, UTTERED OR

POSSESSED A WRITTEN INSTRUMENT WHICH IS OR PURPORTS TO BE, OR WHICH IS CALCULATED TO BECOME OR TO REPRESENT IF COMPLETED, A DEED, WILL, CODICIL, CONTRACT, ASSIGNMENT, COMMERCIAL INSTRUMENT, CREDIT CARD OR OTHER INSTRUMENT WHICH DOES OR MAY EVIDENCE, CREATE, TRANSFER, TERMINATE OR OTHERWISE AFFECT A LEGAL RIGHT, INTEREST, OBLIGATION OR STATUS, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR A PERSON KNOWN TO THE GRAND JURY, HEREINAFTER REFERRED TO AS WITNESS TWENTY-TWO, IN THE AMOUNT OF NINETY-TWO THOUSAND DOLLARS.

FIFTY-THIRD COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 10, 2015, IN THE COUNTY OF QUEENS, WITH KNOWLEDGE THAT IT WAS FORGED AND WITH INTENT TO DEFRAUD, DECEIVE OR INJURE ANOTHER, FALSELY MADE, UTTERED OR POSSESSED A WRITTEN INSTRUMENT WHICH IS OR PURPORTS TO BE, OR WHICH IS CALCULATED TO BECOME OR TO REPRESENT IF COMPLETED, A DEED, WILL, CODICIL, CONTRACT, ASSIGNMENT, COMMERCIAL INSTRUMENT, CREDIT CARD OR OTHER INSTRUMENT WHICH DOES OR MAY EVIDENCE, CREATE, TRANSFER, TERMINATE OR OTHERWISE AFFECT A LEGAL RIGHT, INTEREST, OBLIGATION OR STATUS, TO WIT: MUSTAPHALLI

CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS
TWENTY-TWO, IN THE AMOUNT OF FIFTY-FIVE THOUSAND DOLLARS.

FIFTY-FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT,
ACCUSES THE DEFENDANT OF CRIMINAL POSSESSION OF A FORGED
INSTRUMENT IN THE SECOND DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT AUGUST 19, 2014, IN THE COUNTY OF
QUEENS, WITH KNOWLEDGE THAT IT WAS FORGED AND WITH INTENT TO
DEFRAUD, DECEIVE OR INJURE ANOTHER, FALSELY MADE, UTTERED OR
POSSESSED A WRITTEN INSTRUMENT WHICH IS OR PURPORTS TO BE, OR
WHICH IS CALCULATED TO BECOME OR TO REPRESENT IF COMPLETED, A
DEED, WILL, CODICIL, CONTRACT, ASSIGNMENT, COMMERCIAL
INSTRUMENT, CREDIT CARD OR OTHER INSTRUMENT WHICH DOES OR MAY
EVIDENCE, CREATE, TRANSFER, TERMINATE OR OTHERWISE AFFECT A
LEGAL RIGHT, INTEREST, OBLIGATION OR STATUS, TO WIT: AN
INTERACTIVE BROKERS LLC ACCOUNT APPLICATION FOR WITNESS
NINETEEN.

FIFTY-FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT,
ACCUSES THE DEFENDANT OF FALSIFYING BUSINESS RECORDS IN THE
FIRST DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 7, 2015, IN THE COUNTY OF QUEENS, WITH INTENT TO DEFRAUD, INCLUDING AN INTENT TO COMMIT ANOTHER CRIME OR TO AID OR CONCEAL THE COMMISSION THEREOF, MADE OR CAUSED A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS ONE, IN THE AMOUNT OF ONE HUNDRED THOUSAND DOLLARS.

FIFTY-SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 2, 2015, IN THE COUNTY OF QUEENS, WITH INTENT TO DEFRAUD, INCLUDING AN INTENT TO COMMIT ANOTHER CRIME OR TO AID OR CONCEAL THE COMMISSION THEREOF, MADE OR CAUSED A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS TWO, IN THE AMOUNT OF ONE HUNDRED THOUSAND DOLLARS.

FIFTY-SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 28, 2015, IN THE COUNTY OF QUEENS, WITH INTENT TO DEFRAUD, INCLUDING AN INTENT TO COMMIT ANOTHER CRIME OR TO AID OR CONCEAL THE COMMISSION THEREOF, MADE OR CAUSED A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS THREE, IN THE AMOUNT OF SIXTY THOUSAND DOLLARS.

FIFTY-EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 28, 2015, IN THE COUNTY OF QUEENS, WITH INTENT TO DEFRAUD, INCLUDING AN INTENT TO COMMIT ANOTHER CRIME OR TO AID OR CONCEAL THE COMMISSION THEREOF, MADE OR CAUSED A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS THREE, IN THE AMOUNT OF TWENTY-ONE THOUSAND FIVE HUNDRED EIGHTY DOLLARS.

FIFTY-NINTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 28, 2015, IN THE COUNTY OF QUEENS, WITH INTENT TO DEFRAUD, INCLUDING AN INTENT TO COMMIT ANOTHER CRIME OR TO AID OR CONCEAL THE COMMISSION THEREOF, MADE OR CAUSED A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS THREE, IN THE AMOUNT OF FIVE THOUSAND DOLLARS.

SIXTIETH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 3, 2015, IN THE COUNTY OF QUEENS, WITH INTENT TO DEFRAUD, INCLUDING AN INTENT TO COMMIT ANOTHER CRIME OR TO AID OR CONCEAL THE COMMISSION THEREOF, MADE OR CAUSED A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS FOUR, IN THE AMOUNT OF ONE HUNDRED SIXTY THOUSAND DOLLARS.

SIXTY-FIRST COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 16, 2015, IN THE COUNTY OF QUEENS, WITH INTENT TO DEFRAUD, INCLUDING AN INTENT TO COMMIT ANOTHER CRIME OR TO AID OR CONCEAL THE COMMISSION THEREOF, MADE OR CAUSED A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS FIVE, IN THE AMOUNT OF ONE HUNDRED THOUSAND DOLLARS.

SIXTY-SECOND COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 16, 2015, IN THE COUNTY OF QUEENS, WITH INTENT TO DEFRAUD, INCLUDING AN INTENT TO COMMIT ANOTHER CRIME OR TO AID OR CONCEAL THE COMMISSION THEREOF, MADE OR CAUSED A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS FIVE, IN THE AMOUNT OF NINETY-THREE THOUSAND DOLLARS.

SIXTY-THIRD COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 16, 2015, IN THE COUNTY OF QUEENS, WITH INTENT TO DEFRAUD, INCLUDING AN INTENT TO COMMIT ANOTHER CRIME OR TO AID OR CONCEAL THE COMMISSION THEREOF, MADE OR CAUSED A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS SIX, IN THE AMOUNT OF ONE HUNDRED TEN THOUSAND DOLLARS.

SIXTY-FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT MARCH 23, 2015, IN THE COUNTY OF QUEENS, WITH INTENT TO DEFRAUD, INCLUDING AN INTENT TO COMMIT ANOTHER CRIME OR TO AID OR CONCEAL THE COMMISSION THEREOF, MADE OR CAUSED A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS EIGHT, IN THE AMOUNT OF ONE HUNDRED TEN THOUSAND DOLLARS.

SIXTY-FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT MARCH 23, 2015, IN THE COUNTY OF QUEENS, WITH INTENT TO DEFRAUD, INCLUDING AN INTENT TO COMMIT ANOTHER CRIME OR TO AID OR CONCEAL THE COMMISSION THEREOF, MADE OR CAUSED A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS TEN, IN THE AMOUNT OF SEVEN HUNDRED EIGHTY THOUSAND DOLLARS.

SIXTY-SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 9, 2015, IN THE COUNTY OF QUEENS, WITH INTENT TO DEFRAUD, INCLUDING AN INTENT TO COMMIT ANOTHER CRIME OR TO AID OR CONCEAL THE COMMISSION THEREOF, MADE OR CAUSED A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS ELEVEN, IN THE AMOUNT OF EIGHTY-FOUR THOUSAND DOLLARS.

SIXTY-SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 6, 2015, IN THE COUNTY OF QUEENS, WITH INTENT TO DEFRAUD, INCLUDING AN INTENT TO COMMIT ANOTHER CRIME OR TO AID OR CONCEAL THE COMMISSION THEREOF, MADE OR CAUSED A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS ELEVEN, IN THE AMOUNT OF THIRTY-SIX THOUSAND FIVE HUNDRED TWENTY-SEVEN DOLLARS.

SIXTY-EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 7, 2015, IN THE COUNTY OF QUEENS, WITH INTENT TO DEFRAUD, INCLUDING AN INTENT TO COMMIT ANOTHER CRIME OR TO AID OR CONCEAL THE COMMISSION THEREOF, MADE OR CAUSED A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS TWELVE, IN THE AMOUNT OF SEVENTY THOUSAND DOLLARS.

SIXTY-NINTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 3, 2015, IN THE COUNTY OF QUEENS, WITH INTENT TO DEFRAUD, INCLUDING AN INTENT TO COMMIT ANOTHER CRIME OR TO AID OR CONCEAL THE COMMISSION THEREOF, MADE OR CAUSED A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS FIFTEEN, IN THE AMOUNT OF TWO HUNDRED NINETY-FIVE THOUSAND DOLLARS.

SEVENTIETH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 6, 2015, IN THE COUNTY OF QUEENS, WITH INTENT TO DEFRAUD, INCLUDING AN INTENT TO COMMIT ANOTHER CRIME OR TO AID OR CONCEAL THE COMMISSION THEREOF, MADE OR CAUSED A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS SIXTEEN, IN THE AMOUNT OF SEVENTY THOUSAND DOLLARS.

SEVENTY-FIRST COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 3, 2015, IN THE COUNTY OF QUEENS, WITH INTENT TO DEFRAUD, INCLUDING AN INTENT TO COMMIT ANOTHER CRIME OR TO AID OR CONCEAL THE COMMISSION THEREOF, MADE OR CAUSED A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS SEVENTEEN, IN THE AMOUNT OF TWO HUNDRED SIXTY THOUSAND DOLLARS.

SEVENTY-SECOND COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 3, 2015, IN THE COUNTY OF QUEENS, WITH INTENT TO DEFRAUD, INCLUDING AN INTENT TO COMMIT ANOTHER CRIME OR TO AID OR CONCEAL THE COMMISSION THEREOF, MADE OR CAUSED A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS SEVENTEEN, IN THE AMOUNT OF THIRTY-SIX THOUSAND NINE HUNDRED SEVENTY DOLLARS.

SEVENTY-THIRD COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 9, 2015, IN THE COUNTY OF QUEENS, WITH INTENT TO DEFRAUD, INCLUDING AN INTENT TO COMMIT ANOTHER CRIME OR TO AID OR CONCEAL THE COMMISSION THEREOF, MADE OR CAUSED A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS EIGHTEEN, IN THE AMOUNT OF FIFTY-FIVE THOUSAND DOLLARS.

SEVENTY-FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 3, 2015, IN THE COUNTY OF QUEENS, WITH INTENT TO DEFRAUD, INCLUDING AN INTENT TO COMMIT ANOTHER CRIME OR TO AID OR CONCEAL THE COMMISSION THEREOF, MADE OR CAUSED A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS NINETEEN, IN THE AMOUNT OF THIRTY-FIVE THOUSAND DOLLARS.

SEVENTY-FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 10, 2015, IN THE COUNTY OF QUEENS, WITH INTENT TO DEFRAUD, INCLUDING AN INTENT TO COMMIT ANOTHER CRIME OR TO AID OR CONCEAL THE COMMISSION THEREOF, MADE OR CAUSED A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS TWENTY-TWO, IN THE AMOUNT OF NINETY-TWO THOUSAND DOLLARS.

SEVENTY-SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT APRIL 10, 2015, IN THE COUNTY OF QUEENS, WITH INTENT TO DEFRAUD, INCLUDING AN INTENT TO COMMIT ANOTHER CRIME OR TO AID OR CONCEAL THE COMMISSION THEREOF, MADE OR CAUSED A FALSE ENTRY IN THE BUSINESS RECORDS OF AN ENTERPRISE, TO WIT: MUSTAPHALLI CAPITAL PARTNERS FUND, LP SUBSCRIPTION DOCUMENTS FOR WITNESS TWENTY-TWO, IN THE AMOUNT OF FIFTY-FIVE THOUSAND DOLLARS.

SEVENTY-SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GENERAL BUSINESS LAW SECTION 352-C(6) ARTICLE 23A, COMMITTED AS FOLLOWS:

THE DEFENDANT, BETWEEN APPROXIMATELY MARCH 2015 AND JANUARY 2017, IN THE COUNTY OF QUEENS, INTENTIONALLY ENGAGED IN FRAUD, DECEPTION, CONCEALMENT, SUPPRESSION, FALSE PRETENSE OR FICTITIOUS OR PRETENDED PURCHASE OR SALE, OR MADE ANY MATERIAL FALSE REPRESENTATION OR STATEMENT WITH INTENT TO DECEIVE OR DEFRAUD, WHILE ENGAGED IN INDUCING OR PROMOTING THE ISSUANCE, DISTRIBUTION, EXCHANGE, SALE, NEGOTIATION OR PURCHASE WITHIN OR FROM THIS STATE OF ANY SECURITIES OR COMMODITIES, AS DEFINED IN ARTICLE 23 OF THE GENERAL BUSINESS LAW, AND THEREBY WRONGFULLY OBTAINED PROPERTY OF A VALUE IN EXCESS OF TWO HUNDRED FIFTY DOLLARS FROM WITNESS ONE.

SEVENTY-EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GENERAL BUSINESS LAW SECTION 352-C(6) ARTICLE 23A, COMMITTED AS FOLLOWS:

THE DEFENDANT, BETWEEN APPROXIMATELY MARCH 2015 AND SEPTEMBER 2016, IN THE COUNTY OF QUEENS, INTENTIONALLY ENGAGED IN FRAUD, DECEPTION, CONCEALMENT, SUPPRESSION, FALSE PRETENSE OR

FICTITIOUS OR PRETENDED PURCHASE OR SALE, OR MADE ANY MATERIAL FALSE REPRESENTATION OR STATEMENT WITH INTENT TO DECEIVE OR DEFRAUD, WHILE ENGAGED IN INDUCING OR PROMOTING THE ISSUANCE, DISTRIBUTION, EXCHANGE, SALE, NEGOTIATION OR PURCHASE WITHIN OR FROM THIS STATE OF ANY SECURITIES OR COMMODITIES, AS DEFINED IN ARTICLE 23 OF THE GENERAL BUSINESS LAW, AND THEREBY WRONGFULLY OBTAINED PROPERTY OF A VALUE IN EXCESS OF TWO HUNDRED FIFTY DOLLARS FROM WITNESS TWO.

SEVENTY-NINTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GENERAL BUSINESS LAW SECTION 352-C(6) ARTICLE 23A, COMMITTED AS FOLLOWS:

THE DEFENDANT, BETWEEN APPROXIMATELY APRIL 2015 AND FEBRUARY 2017, IN THE COUNTY OF QUEENS, INTENTIONALLY ENGAGED IN FRAUD, DECEPTION, CONCEALMENT, SUPPRESSION, FALSE PRETENSE OR FICTITIOUS OR PRETENDED PURCHASE OR SALE, OR MADE ANY MATERIAL FALSE REPRESENTATION OR STATEMENT WITH INTENT TO DECEIVE OR DEFRAUD, WHILE ENGAGED IN INDUCING OR PROMOTING THE ISSUANCE, DISTRIBUTION, EXCHANGE, SALE, NEGOTIATION OR PURCHASE WITHIN OR FROM THIS STATE OF ANY SECURITIES OR COMMODITIES, AS DEFINED IN ARTICLE 23 OF THE GENERAL BUSINESS LAW, AND THEREBY WRONGFULLY

OBTAINED PROPERTY OF A VALUE IN EXCESS OF TWO HUNDRED FIFTY DOLLARS FROM WITNESS THREE.

EIGHTIETH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GENERAL BUSINESS LAW SECTION 352-C(6) ARTICLE 23A, COMMITTED AS FOLLOWS:

THE DEFENDANT, BETWEEN APPROXIMATELY MARCH 2015 AND JANUARY 2017, IN THE COUNTY OF QUEENS, INTENTIONALLY ENGAGED IN FRAUD, DECEPTION, CONCEALMENT, SUPPRESSION, FALSE PRETENSE OR FICTITIOUS OR PRETENDED PURCHASE OR SALE, OR MADE ANY MATERIAL FALSE REPRESENTATION OR STATEMENT WITH INTENT TO DECEIVE OR DEFRAUD, WHILE ENGAGED IN INDUCING OR PROMOTING THE ISSUANCE, DISTRIBUTION, EXCHANGE, SALE, NEGOTIATION OR PURCHASE WITHIN OR FROM THIS STATE OF ANY SECURITIES OR COMMODITIES, AS DEFINED IN ARTICLE 23 OF THE GENERAL BUSINESS LAW, AND THEREBY WRONGFULLY OBTAINED PROPERTY OF A VALUE IN EXCESS OF TWO HUNDRED FIFTY DOLLARS FROM WITNESS FOUR.

EIGHTY-FIRST COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GENERAL BUSINESS LAW SECTION 352-C(6) ARTICLE 23A, COMMITTED AS FOLLOWS:

THE DEFENDANT, BETWEEN APPROXIMATELY MARCH 2015 AND JANUARY 2017, IN THE COUNTY OF QUEENS, INTENTIONALLY ENGAGED IN FRAUD, DECEPTION, CONCEALMENT, SUPPRESSION, FALSE PRETENSE OR FICTITIOUS OR PRETENDED PURCHASE OR SALE, OR MADE ANY MATERIAL FALSE REPRESENTATION OR STATEMENT WITH INTENT TO DECEIVE OR DEFRAUD, WHILE ENGAGED IN INDUCING OR PROMOTING THE ISSUANCE, DISTRIBUTION, EXCHANGE, SALE, NEGOTIATION OR PURCHASE WITHIN OR FROM THIS STATE OF ANY SECURITIES OR COMMODITIES, AS DEFINED IN ARTICLE 23 OF THE GENERAL BUSINESS LAW, AND THEREBY WRONGFULLY OBTAINED PROPERTY OF A VALUE IN EXCESS OF TWO HUNDRED FIFTY DOLLARS FROM WITNESS FIVE.

EIGHTY-SECOND COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GENERAL BUSINESS LAW SECTION 352-C(6) ARTICLE 23A, COMMITTED AS FOLLOWS:

THE DEFENDANT, BETWEEN APPROXIMATELY APRIL 2015 AND FEBRUARY 2017, IN THE COUNTY OF QUEENS, INTENTIONALLY ENGAGED IN FRAUD, DECEPTION, CONCEALMENT, SUPPRESSION, FALSE PRETENSE OR FICTITIOUS OR PRETENDED PURCHASE OR SALE, OR MADE ANY MATERIAL FALSE REPRESENTATION OR STATEMENT WITH INTENT TO DECEIVE OR DEFRAUD, WHILE ENGAGED IN INDUCING OR PROMOTING THE ISSUANCE, DISTRIBUTION, EXCHANGE, SALE, NEGOTIATION OR PURCHASE WITHIN OR

FROM THIS STATE OF ANY SECURITIES OR COMMODITIES, AS DEFINED IN ARTICLE 23 OF THE GENERAL BUSINESS LAW, AND THEREBY WRONGFULLY OBTAINED PROPERTY OF A VALUE IN EXCESS OF TWO HUNDRED FIFTY DOLLARS FROM WITNESS SIX.

EIGHTY-THIRD COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GENERAL BUSINESS LAW SECTION 352-C(6) ARTICLE 23A, COMMITTED AS FOLLOWS:

THE DEFENDANT, BETWEEN APPROXIMATELY JUNE 2014 AND JUNE 2016, IN THE COUNTY OF QUEENS, INTENTIONALLY ENGAGED IN FRAUD, DECEPTION, CONCEALMENT, SUPPRESSION, FALSE PRETENSE OR FICTITIOUS OR PRETENDED PURCHASE OR SALE, OR MADE ANY MATERIAL FALSE REPRESENTATION OR STATEMENT WITH INTENT TO DECEIVE OR DEFRAUD, WHILE ENGAGED IN INDUCING OR PROMOTING THE ISSUANCE, DISTRIBUTION, EXCHANGE, SALE, NEGOTIATION OR PURCHASE WITHIN OR FROM THIS STATE OF ANY SECURITIES OR COMMODITIES, AS DEFINED IN ARTICLE 23 OF THE GENERAL BUSINESS LAW, AND THEREBY WRONGFULLY OBTAINED PROPERTY OF A VALUE IN EXCESS OF TWO HUNDRED FIFTY DOLLARS FROM WITNESS SEVEN.

EIGHTY-FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GENERAL BUSINESS LAW SECTION 352-C(6) ARTICLE 23A, COMMITTED AS FOLLOWS:

THE DEFENDANT, BETWEEN APPROXIMATELY MARCH 2015 AND MARCH 2017, IN THE COUNTY OF QUEENS, INTENTIONALLY ENGAGED IN FRAUD, DECEPTION, CONCEALMENT, SUPPRESSION, FALSE PRETENSE OR FICTITIOUS OR PRETENDED PURCHASE OR SALE, OR MADE ANY MATERIAL FALSE REPRESENTATION OR STATEMENT WITH INTENT TO DECEIVE OR DEFRAUD, WHILE ENGAGED IN INDUCING OR PROMOTING THE ISSUANCE, DISTRIBUTION, EXCHANGE, SALE, NEGOTIATION OR PURCHASE WITHIN OR FROM THIS STATE OF ANY SECURITIES OR COMMODITIES, AS DEFINED IN ARTICLE 23 OF THE GENERAL BUSINESS LAW, AND THEREBY WRONGFULLY OBTAINED PROPERTY OF A VALUE IN EXCESS OF TWO HUNDRED FIFTY DOLLARS FROM WITNESS EIGHT.

EIGHTY-FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GENERAL BUSINESS LAW SECTION 352-C(6) ARTICLE 23A, COMMITTED AS FOLLOWS:

THE DEFENDANT, BETWEEN APPROXIMATELY MARCH 2015 AND JANUARY 2017, IN THE COUNTY OF QUEENS, INTENTIONALLY ENGAGED IN FRAUD, DECEPTION, CONCEALMENT, SUPPRESSION, FALSE PRETENSE OR

FICTITIOUS OR PRETENDED PURCHASE OR SALE, OR MADE ANY MATERIAL FALSE REPRESENTATION OR STATEMENT WITH INTENT TO DECEIVE OR DEFRAUD, WHILE ENGAGED IN INDUCING OR PROMOTING THE ISSUANCE, DISTRIBUTION, EXCHANGE, SALE, NEGOTIATION OR PURCHASE WITHIN OR FROM THIS STATE OF ANY SECURITIES OR COMMODITIES, AS DEFINED IN ARTICLE 23 OF THE GENERAL BUSINESS LAW, AND THEREBY WRONGFULLY OBTAINED PROPERTY OF A VALUE IN EXCESS OF TWO HUNDRED FIFTY DOLLARS FROM WITNESS NINE.

EIGHTY-SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GENERAL BUSINESS LAW SECTION 352-C(6) ARTICLE 23A, COMMITTED AS FOLLOWS:

THE DEFENDANT, BETWEEN APPROXIMATELY FEBRUARY 2015 AND JANUARY 2017, IN THE COUNTY OF QUEENS, INTENTIONALLY ENGAGED IN FRAUD, DECEPTION, CONCEALMENT, SUPPRESSION, FALSE PRETENSE OR FICTITIOUS OR PRETENDED PURCHASE OR SALE, OR MADE ANY MATERIAL FALSE REPRESENTATION OR STATEMENT WITH INTENT TO DECEIVE OR DEFRAUD, WHILE ENGAGED IN INDUCING OR PROMOTING THE ISSUANCE, DISTRIBUTION, EXCHANGE, SALE, NEGOTIATION OR PURCHASE WITHIN OR FROM THIS STATE OF ANY SECURITIES OR COMMODITIES, AS DEFINED IN ARTICLE 23 OF THE GENERAL BUSINESS LAW, AND THEREBY WRONGFULLY

OBTAINED PROPERTY OF A VALUE IN EXCESS OF TWO HUNDRED FIFTY DOLLARS FROM WITNESS TEN.

EIGHTY-SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GENERAL BUSINESS LAW SECTION 352-C(6) ARTICLE 23A, COMMITTED AS FOLLOWS:

THE DEFENDANT, BETWEEN APPROXIMATELY MARCH 2015 AND JANUARY 2017, IN THE COUNTY OF QUEENS, INTENTIONALLY ENGAGED IN FRAUD, DECEPTION, CONCEALMENT, SUPPRESSION, FALSE PRETENSE OR FICTITIOUS OR PRETENDED PURCHASE OR SALE, OR MADE ANY MATERIAL FALSE REPRESENTATION OR STATEMENT WITH INTENT TO DECEIVE OR DEFRAUD, WHILE ENGAGED IN INDUCING OR PROMOTING THE ISSUANCE, DISTRIBUTION, EXCHANGE, SALE, NEGOTIATION OR PURCHASE WITHIN OR FROM THIS STATE OF ANY SECURITIES OR COMMODITIES, AS DEFINED IN ARTICLE 23 OF THE GENERAL BUSINESS LAW, AND THEREBY WRONGFULLY OBTAINED PROPERTY OF A VALUE IN EXCESS OF TWO HUNDRED FIFTY DOLLARS FROM WITNESS ELEVEN.

EIGHTY-EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GENERAL BUSINESS LAW SECTION 352-C(6) ARTICLE 23A, COMMITTED AS FOLLOWS:

THE DEFENDANT, BETWEEN APPROXIMATELY MARCH 2015 AND MARCH 2017, IN THE COUNTY OF QUEENS, INTENTIONALLY ENGAGED IN FRAUD, DECEPTION, CONCEALMENT, SUPPRESSION, FALSE PRETENSE OR FICTITIOUS OR PRETENDED PURCHASE OR SALE, OR MADE ANY MATERIAL FALSE REPRESENTATION OR STATEMENT WITH INTENT TO DECEIVE OR DEFRAUD, WHILE ENGAGED IN INDUCING OR PROMOTING THE ISSUANCE, DISTRIBUTION, EXCHANGE, SALE, NEGOTIATION OR PURCHASE WITHIN OR FROM THIS STATE OF ANY SECURITIES OR COMMODITIES, AS DEFINED IN ARTICLE 23 OF THE GENERAL BUSINESS LAW, AND THEREBY WRONGFULLY OBTAINED PROPERTY OF A VALUE IN EXCESS OF TWO HUNDRED FIFTY DOLLARS FROM WITNESS TWELVE.

EIGHTY-NINTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GENERAL BUSINESS LAW SECTION 352-C(6) ARTICLE 23A, COMMITTED AS FOLLOWS:

THE DEFENDANT, BETWEEN APPROXIMATELY JUNE 2014 AND FEBRUARY 2017, IN THE COUNTY OF QUEENS, INTENTIONALLY ENGAGED IN FRAUD, DECEPTION, CONCEALMENT, SUPPRESSION, FALSE PRETENSE OR FICTITIOUS OR PRETENDED PURCHASE OR SALE, OR MADE ANY MATERIAL FALSE REPRESENTATION OR STATEMENT WITH INTENT TO DECEIVE OR DEFRAUD, WHILE ENGAGED IN INDUCING OR PROMOTING THE ISSUANCE, DISTRIBUTION, EXCHANGE, SALE, NEGOTIATION OR PURCHASE WITHIN OR

FROM THIS STATE OF ANY SECURITIES OR COMMODITIES, AS DEFINED IN ARTICLE 23 OF THE GENERAL BUSINESS LAW, AND THEREBY WRONGFULLY OBTAINED PROPERTY OF A VALUE IN EXCESS OF TWO HUNDRED FIFTY DOLLARS FROM WITNESS THIRTEEN.

NINTIETH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GENERAL BUSINESS LAW SECTION 352-C(6) ARTICLE 23A, COMMITTED AS FOLLOWS:

THE DEFENDANT, BETWEEN APPROXIMATELY JUNE 2014 AND AUGUST 2016, IN THE COUNTY OF QUEENS, INTENTIONALLY ENGAGED IN FRAUD, DECEPTION, CONCEALMENT, SUPPRESSION, FALSE PRETENSE OR FICTITIOUS OR PRETENDED PURCHASE OR SALE, OR MADE ANY MATERIAL FALSE REPRESENTATION OR STATEMENT WITH INTENT TO DECEIVE OR DEFRAUD, WHILE ENGAGED IN INDUCING OR PROMOTING THE ISSUANCE, DISTRIBUTION, EXCHANGE, SALE, NEGOTIATION OR PURCHASE WITHIN OR FROM THIS STATE OF ANY SECURITIES OR COMMODITIES, AS DEFINED IN ARTICLE 23 OF THE GENERAL BUSINESS LAW, AND THEREBY WRONGFULLY OBTAINED PROPERTY OF A VALUE IN EXCESS OF TWO HUNDRED FIFTY DOLLARS FROM WITNESS FOURTEEN.

NINETY-FIRST COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GENERAL BUSINESS LAW SECTION 352-C(6) ARTICLE 23A, COMMITTED AS FOLLOWS:

THE DEFENDANT, BETWEEN APPROXIMATELY JUNE 2014 AND MARCH 2017, IN THE COUNTY OF QUEENS, INTENTIONALLY ENGAGED IN FRAUD, DECEPTION, CONCEALMENT, SUPPRESSION, FALSE PRETENSE OR FICTITIOUS OR PRETENDED PURCHASE OR SALE, OR MADE ANY MATERIAL FALSE REPRESENTATION OR STATEMENT WITH INTENT TO DECEIVE OR DEFRAUD, WHILE ENGAGED IN INDUCING OR PROMOTING THE ISSUANCE, DISTRIBUTION, EXCHANGE, SALE, NEGOTIATION OR PURCHASE WITHIN OR FROM THIS STATE OF ANY SECURITIES OR COMMODITIES, AS DEFINED IN ARTICLE 23 OF THE GENERAL BUSINESS LAW, AND THEREBY WRONGFULLY OBTAINED PROPERTY OF A VALUE IN EXCESS OF TWO HUNDRED FIFTY DOLLARS FROM WITNESS FIFTEEN.

NINETY-SECOND COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GENERAL BUSINESS LAW SECTION 352-C(6) ARTICLE 23A, COMMITTED AS FOLLOWS:

THE DEFENDANT, BETWEEN APPROXIMATELY MARCH 2015 AND FEBRUARY 2017, IN THE COUNTY OF QUEENS, INTENTIONALLY ENGAGED IN FRAUD, DECEPTION, CONCEALMENT, SUPPRESSION, FALSE PRETENSE OR

FICTITIOUS OR PRETENDED PURCHASE OR SALE, OR MADE ANY MATERIAL FALSE REPRESENTATION OR STATEMENT WITH INTENT TO DECEIVE OR DEFRAUD, WHILE ENGAGED IN INDUCING OR PROMOTING THE ISSUANCE, DISTRIBUTION, EXCHANGE, SALE, NEGOTIATION OR PURCHASE WITHIN OR FROM THIS STATE OF ANY SECURITIES OR COMMODITIES, AS DEFINED IN ARTICLE 23 OF THE GENERAL BUSINESS LAW, AND THEREBY WRONGFULLY OBTAINED PROPERTY OF A VALUE IN EXCESS OF TWO HUNDRED FIFTY DOLLARS FROM WITNESS SIXTEEN.

NINETY-THIRD COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GENERAL BUSINESS LAW SECTION 352-C(6) ARTICLE 23A, COMMITTED AS FOLLOWS:

THE DEFENDANT, BETWEEN APPROXIMATELY JUNE 2014 AND MARCH 2017, IN THE COUNTY OF QUEENS, INTENTIONALLY ENGAGED IN FRAUD, DECEPTION, CONCEALMENT, SUPPRESSION, FALSE PRETENSE OR FICTITIOUS OR PRETENDED PURCHASE OR SALE, OR MADE ANY MATERIAL FALSE REPRESENTATION OR STATEMENT WITH INTENT TO DECEIVE OR DEFRAUD, WHILE ENGAGED IN INDUCING OR PROMOTING THE ISSUANCE, DISTRIBUTION, EXCHANGE, SALE, NEGOTIATION OR PURCHASE WITHIN OR FROM THIS STATE OF ANY SECURITIES OR COMMODITIES, AS DEFINED IN ARTICLE 23 OF THE GENERAL BUSINESS LAW, AND THEREBY WRONGFULLY

OBTAINED PROPERTY OF A VALUE IN EXCESS OF TWO HUNDRED FIFTY DOLLARS FROM WITNESS SEVENTEEN.

NINETY-FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GENERAL BUSINESS LAW SECTION 352-C(6) ARTICLE 23A, COMMITTED AS FOLLOWS:

THE DEFENDANT, BETWEEN APPROXIMATELY MARCH 2015 AND DECEMBER 2016, IN THE COUNTY OF QUEENS, INTENTIONALLY ENGAGED IN FRAUD, DECEPTION, CONCEALMENT, SUPPRESSION, FALSE PRETENSE OR FICTITIOUS OR PRETENDED PURCHASE OR SALE, OR MADE ANY MATERIAL FALSE REPRESENTATION OR STATEMENT WITH INTENT TO DECEIVE OR DEFRAUD, WHILE ENGAGED IN INDUCING OR PROMOTING THE ISSUANCE, DISTRIBUTION, EXCHANGE, SALE, NEGOTIATION OR PURCHASE WITHIN OR FROM THIS STATE OF ANY SECURITIES OR COMMODITIES, AS DEFINED IN ARTICLE 23 OF THE GENERAL BUSINESS LAW, AND THEREBY WRONGFULLY OBTAINED PROPERTY OF A VALUE IN EXCESS OF TWO HUNDRED FIFTY DOLLARS FROM WITNESS EIGHTEEN.

NINETY-FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GENERAL BUSINESS LAW SECTION 352-C(6) ARTICLE 23A, COMMITTED AS FOLLOWS:

THE DEFENDANT, BETWEEN APPROXIMATELY AUGUST 2014 AND JANUARY 2017, IN THE COUNTY OF QUEENS, INTENTIONALLY ENGAGED IN FRAUD, DECEPTION, CONCEALMENT, SUPPRESSION, FALSE PRETENSE OR FICTITIOUS OR PRETENDED PURCHASE OR SALE, OR MADE ANY MATERIAL FALSE REPRESENTATION OR STATEMENT WITH INTENT TO DECEIVE OR DEFRAUD, WHILE ENGAGED IN INDUCING OR PROMOTING THE ISSUANCE, DISTRIBUTION, EXCHANGE, SALE, NEGOTIATION OR PURCHASE WITHIN OR FROM THIS STATE OF ANY SECURITIES OR COMMODITIES, AS DEFINED IN ARTICLE 23 OF THE GENERAL BUSINESS LAW, AND THEREBY WRONGFULLY OBTAINED PROPERTY OF A VALUE IN EXCESS OF TWO HUNDRED FIFTY DOLLARS FROM WITNESSES NINETEEN AND TWENTY.

NINETY-SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GENERAL BUSINESS LAW SECTION 352-C(6) ARTICLE 23A, COMMITTED AS FOLLOWS:

THE DEFENDANT, BETWEEN APPROXIMATELY JUNE 2014 AND MARCH 2017, IN THE COUNTY OF QUEENS, INTENTIONALLY ENGAGED IN FRAUD, DECEPTION, CONCEALMENT, SUPPRESSION, FALSE PRETENSE OR FICTITIOUS OR PRETENDED PURCHASE OR SALE, OR MADE ANY MATERIAL FALSE REPRESENTATION OR STATEMENT WITH INTENT TO DECEIVE OR DEFRAUD, WHILE ENGAGED IN INDUCING OR PROMOTING THE ISSUANCE, DISTRIBUTION, EXCHANGE, SALE, NEGOTIATION OR PURCHASE WITHIN OR

FROM THIS STATE OF ANY SECURITIES OR COMMODITIES, AS DEFINED IN ARTICLE 23 OF THE GENERAL BUSINESS LAW, AND THEREBY WRONGFULLY OBTAINED PROPERTY OF A VALUE IN EXCESS OF TWO HUNDRED FIFTY DOLLARS FROM WITNESS TWENTY-ONE.

NINETY-SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF GENERAL BUSINESS LAW SECTION 352-C(6) ARTICLE 23A, COMMITTED AS FOLLOWS:

THE DEFENDANT, BETWEEN APPROXIMATELY MARCH 2015 AND FEBRUARY 2017, IN THE COUNTY OF QUEENS, INTENTIONALLY ENGAGED IN FRAUD, DECEPTION, CONCEALMENT, SUPPRESSION, FALSE PRETENSE OR FICTITIOUS OR PRETENDED PURCHASE OR SALE, OR MADE ANY MATERIAL FALSE REPRESENTATION OR STATEMENT WITH INTENT TO DECEIVE OR DEFRAUD, WHILE ENGAGED IN INDUCING OR PROMOTING THE ISSUANCE, DISTRIBUTION, EXCHANGE, SALE, NEGOTIATION OR PURCHASE WITHIN OR FROM THIS STATE OF ANY SECURITIES OR COMMODITIES, AS DEFINED IN ARTICLE 23 OF THE GENERAL BUSINESS LAW, AND THEREBY WRONGFULLY OBTAINED PROPERTY OF A VALUE IN EXCESS OF TWO HUNDRED FIFTY DOLLARS FROM WITNESS TWENTY-TWO.

NINETY-EIGHTH COUNT

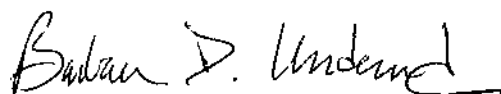
THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF SCHEME TO DEFRAUD IN THE FIRST DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, BETWEEN APPROXIMATELY JUNE 2014 AND MARCH 2017, IN THE COUNTY OF QUEENS, ENGAGED IN A SCHEME CONSTITUTING A SYSTEMATIC ONGOING COURSE OF CONDUCT WITH INTENT TO DEFRAUD TEN OR MORE PERSONS OR TO OBTAIN PROPERTY FROM TEN OR MORE PERSONS BY FALSE OR FRAUDULENT PRETENSES, REPRESENTATIONS OR PROMISES, AND SO OBTAINED PROPERTY FROM ONE OR MORE SUCH PERSONS.

NINETY-NINTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF SCHEME TO DEFRAUD IN THE FIRST DEGREE, COMMITTED AS FOLLOWS:

THE DEFENDANT, BETWEEN APPROXIMATELY JUNE 2014 AND MARCH 2017, IN THE COUNTY OF QUEENS, ENGAGED IN A SCHEME CONSTITUTING A SYSTEMATIC ONGOING COURSE OF CONDUCT WITH INTENT TO DEFRAUD MORE THAN ONE PERSON OR TO OBTAIN PROPERTY FROM MORE THAN ONE PERSON BY FALSE OR FRAUDULENT PRETENSES, REPRESENTATIONS OR PROMISES, AND SO OBTAINED PROPERTY WITH A VALUE IN EXCESS OF ONE THOUSAND DOLLARS FROM ONE OR MORE SUCH PERSONS.



BARBARA D. UNDERWOOD
ACTING ATTORNEY GENERAL
STATE OF NEW YORK