

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

THE PEOPLE OF THE STATE OF NEW YORK

-against-

NORA ANDERSON and  
SETH RUBENSTEIN,

Defendants.

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuse the defendants of the crime of **OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE**, in violation of Penal Law § 175.35, committed as follows:

Said defendants, in the County of New York and elsewhere, on or about September 2, 2008, knowing that a written instrument, to wit, an 11 Day Pre-Primary New York State Board of Elections Financial Disclosure Statement, contained a false statement and false information, and with intent to defraud the state and any political subdivision, public authority and public benefit corporation of the state, offered and presented it to a public office, public servant, public authority and public benefit corporation, to wit, the New York State Board of Elections, with the knowledge and belief that it would be filed with, registered and recorded in and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation.

Such conduct had and was likely to have a particular effect upon the State and County of New York, and was performed with intent that it would and with knowledge that it was likely to have such a particular effect herein.

SECOND COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendants of the crime of **OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE**, in violation of Penal Law § 175.35, committed as follows:

Said defendants, in the County of New York and elsewhere, on or about September 3, 2008, knowing that a written instrument, to wit, a State of New York Board of Elections Disclosure Statement labeled as Disclosure Statement #2, contained a false statement and false information, and with intent to defraud the state and any political subdivision, public authority and public benefit corporation of the state, offered and presented it to a public office, public servant, public authority and public benefit corporation, to wit, the Board of Elections of the City of New York, with the knowledge and belief that it would be filed with, registered and recorded in and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation.

Such conduct had and was likely to have a particular effect upon the State and County of New York, and was performed with intent that it would and with knowledge that it was likely to have such a particular effect herein.

THIRD COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendants of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

Said defendants, in the County of New York and elsewhere, on or about September 3, 2008, with intent to defraud, including an intent to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of Anderson for Surrogate, to wit, a State of New York Board of Elections Disclosure Statement labeled as Disclosure Statement #2.

Such conduct had and was likely to have a particular effect upon the State and County of New York, and was performed with intent that it would and with knowledge that it was likely to have such a particular effect herein.

FOURTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendants of the crime of **OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE**, in violation of Penal Law § 175.35, committed as follows:

Said defendants, in the County of New York and elsewhere, on or about September 22, 2008, knowing that a written instrument, to wit, a 10 Day Post-Primary New York State Board of Elections Financial Disclosure Statement, contained a false statement and false information, and with intent to defraud the state and any political subdivision, public authority and public benefit corporation of the state, offered and presented it to a public office, public servant, public authority and public benefit corporation, to wit, the New York State Board of Elections, with the knowledge and belief that it would be filed with, registered and recorded in and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation.

Such conduct had and was likely to have a particular effect upon the State and County of New York, and was performed with intent that it would and with knowledge that it was likely to have such a particular effect herein.

FIFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendants of the crime of **OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE**, in violation of Penal Law § 175.35, committed as follows:

Said defendants, in the County of New York and elsewhere, on or about September 20, 2008, knowing that a written instrument, to wit, a State of New York Board of Elections Disclosure Statement labeled as Disclosure Statement #3, contained a false statement and false information, and with intent to defraud the state and any political subdivision, public authority and public benefit corporation of the state, offered and presented it to a public office, public servant, public authority and public benefit corporation, to wit, the New York City Board of Elections, with the knowledge and belief that it would be filed with, registered and recorded in and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation.

Such conduct had and was likely to have a particular effect upon the State and County of New York, and was performed with intent that it would and with knowledge that it was likely to have such a particular effect herein.

SIXTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendants of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

Said defendants, in the County of New York and elsewhere, on or about September 20, 2008, with intent to defraud, including an intent to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of Anderson for Surrogate, to wit, a State of New York Board of Elections Disclosure Statement labeled as Disclosure Statement #3.

Such conduct had and was likely to have a particular effect upon the State and County of New York, and was performed with intent that it would and with knowledge that it was likely to have such a particular effect herein.

SEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendants of the crime of **CAMPAIGN CONTRIBUTION TO BE UNDER TRUE NAME OF CONTRIBUTOR**, in violation of Election Law §§ 14-120(1) and 14-126(2), committed as follows:

Said defendants, in the County of New York and elsewhere, on or about August 20, 2008, knowingly and willfully, in a name other than his own, directly and indirectly, made a payment and

a promise of payment to a candidate and a political committee and to any officer and member thereof, and to any person acting under its authority and on its behalf and on behalf of any candidate and such committee and such person received a payment and a promise of payment and entered and caused the same to be entered in the accounts and records of a political committee, in a name other than that of the person and persons by whom it was made.

Such conduct had and was likely to have a particular effect upon the State and County of New York, and was performed with intent that it would and with knowledge that it was likely to have such a particular effect herein.

EIGHTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendants of the crime of **CAMPAIGN CONTRIBUTION TO BE UNDER TRUE NAME OF CONTRIBUTOR**, in violation of Election Law §§ 14-120(1) and 14-126(2), committed as follows:

Said defendants, in the County of New York and elsewhere, on or about August 26, 2008, knowingly and willfully, in a name other than his own, directly and indirectly, made a payment and a promise of payment to a candidate and a political committee and to any officer and member thereof, and to any person acting under its authority and on its behalf and on behalf of any candidate and such committee and such person received a payment

and a promise of payment and entered and caused the same to be entered in the accounts and records of a political committee, in a name other than that of the person and persons by whom it was made.

Such conduct had and was likely to have a particular effect upon the State and County of New York, and was performed with intent that it would and with knowledge that it was likely to have such a particular effect herein.

NINTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendants of the crime of **KNOWINGLY AND WILLFULLY VIOLATING THE CONTRIBUTION LIMITS OF THE ELECTION LAW**, in violation of Election Law § 14-126(3), committed as follows:

Said defendants, in the County of New York and elsewhere, on or about August 20, 2008, knowingly and willfully contributed, accepted and aided and participated in the acceptance of a contribution in an amount exceeding an applicable maximum specified in the Election Law.

Such conduct had and was likely to have a particular effect upon the State and County of New York, and was performed with intent that it would and with knowledge that it was likely to have such a particular effect herein.

TENTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendants of the crime of **KNOWINGLY AND WILLFULLY VIOLATING THE CONTRIBUTION LIMITS OF THE ELECTION LAW**, in violation of Election Law § 14-126(3), committed as follows:

Said defendants, in the County of New York and elsewhere, on or about August 26, 2008, knowingly and willfully contributed, accepted and aided and participated in the acceptance of a contribution in an amount exceeding an applicable maximum specified in the Election Law.

Such conduct had and was likely to have a particular effect upon the State and County of New York, and was performed with intent that it would and with knowledge that it was likely to have such a particular effect herein.

ROBERT M. MORGENTHAU

District Attorney

Filed:

NA

NO.

THE PEOPLE OF THE STATE OF NEW YORK

-against-

NORA ANDERSON AND SETH RUBENSTEIN,

Defendants.

INDICTMENT

OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, P.L. § 175.35 (BOTH DEFENDANTS-  
FOUR COUNTS)

FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, P.L. § 175.10 (BOTH DEFENDANTS- TWO  
COUNTS)

CAMPAIGN CONTRIBUTION TO BE UNDER TRUE NAME OF CONTRIBUTOR, ELECTION LAW §§ 14-120(1),  
14-126(2) (BOTH DEFENDANTS- TWO COUNTS)

KNOWINGLY AND WILLFULLY VIOLATING THE CONTRIBUTION LIMITS OF THE ELECTION LAW, ELECTION LAW  
§ 14-126(3) (BOTH DEFENDANTS- TWO COUNTS)

ROBERT M. MORGENTHAU, District  
Attorney

A True Bill

ADA DANIEL G. COURT  
RAC

Foreman

ADJOURNED TO PART \_\_\_\_\_ ON \_\_\_\_\_