

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

THE PEOPLE OF THE STATE OF NEW YORK

-against-

DWAYNE MONTGOMERY,  
SHAMSUDDIN RIZA,  
MILLICENT REDICK,  
RONALD PEEK,  
YAHYA MUSHTAQ,  
SHAHID MUSHTAQ, and  
ECOSAFETY CONSULTANTS INC.,

Defendants.

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendants Dwayne Montgomery, Shamsuddin Riza, Millicent Redick, Ronald Peek, Yahya Mushtaq, Shahid Mushtaq, and EcoSafety Consultants Inc. of the crime of **CONSPIRACY IN THE FIFTH DEGREE**, in violation of Penal Law § 105.05(1), committed as follows:

The defendants, in the County of New York, during the period from on or about August 6, 2020, to on or about November 9, 2021, with the intent that conduct constituting the felonies of Grand Larceny in the Third Degree and Offering a False Instrument for Filing in the First Degree be performed, agreed with each other and others to engage in and cause the performance of such conduct.

## PREAMBLE

It was the purpose of the conspiracy for Dwayne Montgomery, Shamsuddin Riza, Millicent Redick, Ronald Peek, Yahya Mushtaq, Shahid Mushtaq, EcoSafety Consultants Inc., and others to fraudulently obtain tens of thousands of dollars in matching funds for a 2021 New York City Mayoral Campaign (“the Campaign”) by submitting falsified campaign contribution forms to the New York City Campaign Finance Board (“CFB”), which is located in New York County. It was part of the conspiracy for Dwayne Montgomery, Shamsuddin Riza, Ronald Peek, and others to provide funds for and to reimburse straw donors, to coordinate the campaign contributions of the straw donors through fundraiser events, and to instruct other conspirators on how to structure and disguise straw donor contributions to avoid detection. It was further part of the conspiracy for Dwayne Montgomery, Shamsuddin Riza, Millicent Redick, Ronald Peek, Yahya Mushtaq, and Shahid Mushtaq to recruit straw donors to the conspiracy. Ronald Peek advised Shamsuddin Riza and others on how to structure the contributions and on other matters relevant to the conspiracy, including how to avoid detection by the CFB. Yahya Mushtaq and Shahid Mushtaq, as principals of EcoSafety Consultants Inc., conspired with Shamsuddin Riza, Ronald Peek, and others to make illegal contributions to the Campaign using the personal identifying information of employees of EcoSafety Consultants Inc. without the knowledge of said employees to make it appear that said employees were the source of the contributions rather than Yahya Mushtaq, Shahid Mushtaq, and EcoSafety Consultants Inc.

### OVERT ACTS

In furtherance of said conspiracy and to effect the objects thereof, during the period from on or about August 6, 2020, to on or about November 9, 2021, the following overt acts, among others, were committed:

1. From on or about August 6, 2020, to on or about August 20, 2020, Dwayne Montgomery and unindicted co-conspirator-1 (“UCC-1”), in connection with Campaign Representative-1, organized a fundraiser event for the Campaign.
2. On or about August 6, 2020, Dwayne Montgomery withdrew approximately \$26,774 from a personal bank account.
3. On or about August 7, 2020, Dwayne Montgomery withdrew approximately \$13,011 from a personal bank account.
4. On or about August 13, 2020, from approximately 3:19 PM, to approximately 3:35 PM, Straw Donor-1, Straw Donor-2, Straw Donor-3, and Straw Donor-4 each made a contribution to the Campaign of \$100, and then from approximately 3:46 PM, to approximately 3:58 PM, each made a contribution to the Campaign of \$150.
5. On or about August 13, 2020, Straw Donor-5 contributed \$250 to the Campaign.
6. On or about August 14, 2020, Dwayne Montgomery transferred \$260 to Straw Donor-6 via the Cash App mobile payment service. Approximately one hour after the transfer was

completed, in New York County, Straw Donor-6 contributed \$260 to the Campaign via an online contribution portal.

7. On or about August 14, 2020, Dwayne Montgomery transferred \$250 to Straw Donor-7 via the Zelle mobile payment service. That same day, in New York County, Straw Donor-7 contributed \$250 to the Campaign via an online contribution portal.
8. On or about August 17, 2020, Straw Donor-8 contributed \$250 to the Campaign under a Brooklyn address, and then approximately four minutes later contributed \$250 to the Campaign under a Queens address.
9. On or about August 19, 2020, Dwayne Montgomery emailed Campaign Representative-1, attaching a receipt of a contribution by Straw Donor-9 and requested that Dwayne Montgomery and UCC-1 be credited for the contribution.
10. On or about December 10, 2020, Dwayne Montgomery sent Shamsuddin Riza an email purporting to invite Shahid Mushtaq and Yahya Mushtaq of EcoSafety Consultants Inc. to a meeting with the Mayoral Candidate (“the Candidate”) associated with the Campaign.
11. On the same date, Dwayne Montgomery sent Shamsuddin Riza a second email purporting to invite unindicted co-conspirator-2 (“UCC-2”), a representative of Scaffolding Company-1, to a meeting with the Candidate.
12. From on or about December 10, 2020, to on or about December 11, 2020, Shamsuddin Riza forwarded the purported invitation emails from Dwayne Montgomery to the personal email accounts of Shahid Mushtaq, Yahya Mushtaq, and UCC-2.

13. From on or about December 10, 2020, to on or about May 17, 2021, Dwayne Montgomery, Shamsuddin Riza, and UCC-1 organized a second fundraiser event for the Campaign. Yahya Mushtaq, Shahid Mushtaq, and UCC-2, among others, each contributed \$250 to the Campaign on that date.
14. On or about July 8, 2021, Dwayne Montgomery and Shamsuddin Riza had a telephone conversation during which they discussed support for the Campaign.
15. On or about July 9, 2021, Dwayne Montgomery and Shamsuddin Riza had a telephone conversation during which Dwayne Montgomery stated in substance that “[the Candidate] said he doesn’t want to do anything if he doesn’t get 25 Gs.”
16. On or about July 15, 2021, Dwayne Montgomery and Shamsuddin Riza had a telephone conversation during which they discussed instructing donors to the Campaign to put future campaign contributions in the names of the donors’ family members to avoid campaign contribution limits and to generate matching funds from the CFB.
17. On or about July 18, 2021, in a telephone conversation, Ronald Peek and Shamsuddin Riza discussed contributing to the Campaign through a straw donor. During the conversation, Shamsuddin Riza directed Ronald Peek in substance, “I know what the campaign finance laws is, I understand that. I’m trying to raise this money . . . Make sure it’s \$1000 in your name and \$1000 in another person’s name because the matching funds is eight-to-one, so \$2000 is \$16,000.”
18. On or about July 19, 2021, Ronald Peek texted Shamsuddin Riza a link to the CFB website pertaining to campaign finance limitations.

19. On or about July 20, 2021, in a telephone conversation, Dwayne Montgomery told Shamsuddin Riza in substance to instruct large-dollar contributors to structure campaign contributions through family members to avoid campaign finance limitations and to trigger additional matching funds from the CFB.
20. On or about July 20, 2021, Shamsuddin Riza and unindicted co-conspirator-3 (“UCC-3”), a representative of Scaffolding Company-1 and a relative of UCC-2, had a telephone conversation during which Shamsuddin Riza instructed UCC-3 to structure contributions of over \$250 into \$250 allotments.
21. On or about July 21, 2021, Shamsuddin Riza forwarded an email to Dwayne Montgomery advertising an upcoming Kings County construction project called Vital Brooklyn. Shamsuddin Riza stated in substance in the email, “FYI ! This is the one I want , Safety , Drywall , and Security one project but we all can eat ! Please show to him before Event it will start when he's in office.”
22. On or about July 21, 2021, Shamsuddin Riza and Dwayne Montgomery had a telephone conversation regarding structuring campaign contributions to trigger additional matching funds from the CFB. During the conversation, Dwayne Montgomery stated in substance, “Well, if they’ve already done \$250 in their names then yes. They’re done. It has to be in someone else’s name in their household who did not contribute. Like with me. I got me, my brother, and my son, my wife, and my mother-in-law. If I contribute \$250 in my name, say I was a City resident, alright? I get Chanita to write a \$250 check. I get, uh, Brandon to write a \$250. I get Miss Jackson. So now, you know, so on, now I got four people to write a \$250

check. I'm donating \$1000 but it's coming in \$250 intervals by other members and we get matching funds.”

23. On or about July 25, 2021, in a telephone conversation with unindicted co-conspirator-4 (“UCC-4”), a construction company principal, Shamsuddin Riza instructed UCC-4 in substance to structure a contribution to the Campaign into \$250 allotments by using family members as straw donors.
24. On or about July 27, 2021, in a telephone conversation with Straw Donor-10, Shamsuddin Riza stated in substance that he would provide Straw Donor-10 with \$250 and instructed Straw Donor-10 to contribute \$250 to the Campaign. Shamsuddin Riza further stated in substance that he would provide \$250 each for Straw Donor-11, Straw Donor-12, and Straw Donor-13, relatives of Straw Donor-10, to make contributions to the Campaign.
25. On or about July 29, 2021, in a telephone conversation, Shamsuddin Riza stated in substance to Dwayne Montgomery that he would purchase United States Post Office money orders for use in the straw donor scheme, and they discussed the importance of not purchasing multiple money orders at the same time and place to prevent the fraud from being detected.
26. On or about July 29, 2021, in a telephone conversation with Straw Donor-14, an associate, Shamsuddin Riza stated in substance that he would contribute to the Campaign in the name of Straw Donor-14.
27. On or about July 29, 2021, in a telephone conversation with a relative, Shamsuddin Riza stated in substance, “All you gotta do is fill out the money order that I’m a bring to you, alright . . . that donation because you haven’t contributed before, counts eight-to-one, so that \$250 is

worth \$2000 . . . then there's Millie, she gonna work the Esplanade . . . matching funds, we looking to do, between me and Monty, at least 60 grand.”

28. On or about July 29, 2021, Shamsuddin Riza sent a text message to Straw Donor-12, which stated in substance, “I’m putting money in for you.”
29. On or about July 29, 2021, in a telephone conversation with Straw Donor-15, a relative, Shamsuddin Riza stated in substance that he would make a contribution to the Campaign in the name of Straw Donor-15: “I’ll put the money up for you. I’ll fill that motherfucker up, write 470 Lenox Avenue on that bitch, and submit the \$250. And your sister will be the one that will be filling out that God damn postal money order.”
30. On or about July 29, 2021, in a telephone conversation, Shamsuddin Riza stated in substance to Straw Donor-10, “I’m picking up a money order – a postal money order . . . I need you to fill out that money order as a contributor. I’m giving the \$250 for you . . . Because that \$250 first time supporter . . . The \$250 counts eight-to-one.”
31. On or about July 30, 2021, in a telephone conversation with a relative, Shamsuddin Riza stated in substance, “I’m picking up these money orders . . . So, I’m gonna drop four money orders at the house. They’re different, I’ve got to go to different post offices . . . I got all the money orders because they’re first-time donors. Their \$250 is valued at \$2000 because eight-to-one.”
32. On or about July 30, 2021, Shamsuddin Riza purchased eight \$250 postal money orders at four different United States Post Office branches, each in New York County.
33. From on or about July 30, 2021, to on or about August 25, 2021, each of these postal money orders was submitted to the CFB attached to a campaign contribution form in the name of



either Straw Donor-10, Straw Donor-11, Straw Donor-12, Straw Donor-13, Straw Donor-14, Straw Donor-15, Straw Donor-16, or Straw Donor-17.

34. On or about August 5, 2021, in a telephone conversation with Straw Donor-16, a Manhattan Democratic Party District Leader, Shamsuddin Riza stated in substance he intended to make a contribution to the Campaign in the name of Straw Donor-16: "I'm putting up the money for you, all you have to do is fill out the contribution form and whatnot, right."
35. On or about August 6, 2021, in a telephone conversation, Shamsuddin Riza instructed Shahid Mushtaq in substance to use the employees of EcoSafety Consultants Inc. as straw donors to structure contributions to the Campaign.
36. On or about August 6, 2021, in a telephone conversation, Shamsuddin Riza asked Ronald Peek in substance to call Shahid Mushtaq and help him to distribute the campaign contributions among the employees of EcoSafety Consultants Inc.: "EcoSafety . . . they read the contribution forms . . . and they called me and said, 'Well, you know, since we do business with the City, the most we can donate is \$400.' . . . I told them, I said, 'Look, how many people work at EcoSafety?' He said 'About sixty of us.' I said, 'Give everybody that works with EcoSafety a \$250 money order, but not consecutive money orders.'"
37. On or about August 6, 2021, Shamsuddin Riza and Ronald Peek had a telephone conversation about structuring campaign contributions through the employees of a company, during which Ronald Peek stated in substance: "you gotta be careful cause you gotta make sure you do it through workers they trust, that's not gonna talk, because remember a guy went to jail for that."

38. On or about August 23, 2021, Shamsuddin Riza and Ronald Peek had a telephone conversation during which Ronald Peek discussed advising a campaign contributor how to structure a contribution to avoid detection.
39. On or about August 24, 2021, in a telephone conversation, Shamsuddin Riza directed Yahya Mushtaq in substance to structure contributions to the Campaign through employees of EcoSafety Consultants Inc.: “Alright, even though, even though it says on the flier if you do business with the City, the maximum you can donate is \$400 . . . what you want to do, alright, because we’re sponsoring the event, we’re going to do just like the white boys . . . You could use a straw man . . . the principals are the ones that do business with the City. Whoever’s on the LLC or the incorporation, those are the people that do business with the City. Anybody else is an employee, the employees don’t fall under that criteria.”
40. On or about August 25, 2021, Yahya Mushtaq sent a text message to Shamsuddin Riza stating in substance, “Can we do money orders from the post office.”
41. On or about August 25, 2021, Shamsuddin Riza replied via text message, stating in substance, “Yes, but not consecutive. Go to different windows.”
42. On or about August 25, 2021, one or more members of the conspiracy purchased six postal money orders for \$400 each at six different United States Post Office branches in Queens County, using funds from an EcoSafety Consultants Inc. company bank account.
43. On or about August 25, 2021, each of the six \$400 money orders was submitted to the CFB with an attached campaign contribution form in the name of either Straw Donor-18, Straw Donor-19, Straw Donor-20, Straw Donor-21, Straw Donor-22, or Straw Donor-23.

44. On or about August 25, 2021, in a telephone conversation, Ronald Peek stated in substance to Shamsuddin Riza that he gave Dwayne Montgomery checks totaling \$5400 for contribution to the Campaign.
45. On or about September 8, 2021, Shamsuddin Riza and Millicent Redick had a telephone conversation, during which they discussed Millicent Redick recruiting senior citizens in the Esplanade Gardens area of New York County to serve as straw donors for contributions to the Campaign.
46. On or about September 8, 2021, in a telephone conversation, Dwayne Montgomery stated in substance to Shamsuddin Riza that unindicted co-conspirator-5 (“UCC-5”) had additional funds for contribution to the Campaign, and that UCC-5 needed more than 10 straw donors to structure the funds to maximize the CFB matching funds illegally.
47. In the September 8, 2021 telephone conversation with Dwayne Montgomery, Shamsuddin Riza agreed in substance to assist UCC-5 by recruiting straw donors.
48. On or about September 17, 2021, in a telephone conversation, Shamsuddin Riza instructed Millicent Redick in substance to purchase money orders from different post office branches to prevent detection of the straw donor scheme.
49. On or about September 17, 2021, in New York County, UCC-5 transferred \$1000 to Dwayne Montgomery.
50. On or about September 20, 2021, in New York County, Shamsuddin Riza gave Millicent Redick a check for \$2100 to purchase of money orders.

51. On or about September 21, 2021, Millicent Redick deposited the check from Shamsuddin Riza into her personal bank account.
52. On or about September 23, 2021, in a telephone conversation, Millicent Redick stated in substance to Shamsuddin Riza that she was meeting an individual to give him cash to reimburse the individual's campaign contribution.
53. In the September 23, 2021, telephone conversation with Shamsuddin Riza, Millicent Redick further stated in substance that she was using both money orders and checks to avoid suspicion.
54. From on or about September 23, 2021, to on or about October 5, 2021, Millicent Redick purchased nine money orders for \$200 each from United States Post Office branches in New York and Bronx Counties.
55. From on or about September 23, 2021, to on or about November 8, 2021, Millicent Redick delivered to Shamsuddin Riza completed campaign contribution cards and accompanying checks or money orders for 12 contributions, each in the amount of \$200.
56. On or about October 4, 2021, Millicent Redick deposited a \$1000 check from Shamsuddin Riza into her personal bank account.
57. On or about November 9, 2021, Shamsuddin Riza possessed copies of contribution cards for contributions by New York County straw donors to the Campaign.

SECOND COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Dwayne Montgomery, Shamsuddin Riza, Millicent Redick, Ronald Peek, Yahya Mushtaq, Shahid Mushtaq, and EcoSafety Consultants Inc. of the crime of **ATTEMPTED GRAND LARCENY IN THE THIRD DEGREE**, in violation of Penal Law §§ 110/155.35(1), committed as follows:

The defendants, in the County of New York, during the period from on or about August 6, 2020, to on or about November 9, 2021, attempted to steal property from the New York City Campaign Finance Board, and the value of the property exceeded three thousand dollars.

THIRD COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant Dwayne Montgomery of the crime of **OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law § 175.35, committed as follows:

The defendant, in the County of New York, on or about August 13, 2020, knowing that a written instrument, to wit, a campaign contribution record (in the name of “Straw Donor-1”), 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, with the knowledge and belief that it would be filed with, registered and recorded in and otherwise become

part of the records of such public office, public servant, public authority and public benefit corporation.

FOURTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant Dwayne Montgomery of the crime of **OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law § 175.35, committed as follows:

The defendant, in the County of New York, on or about August 13, 2020, knowing that a written instrument, to wit, a campaign contribution record (in the name of “Straw Donor-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, with the knowledge and belief that it would be filed with, registered and recorded in and otherwise become part of the records of such public office, public servant, public authority and public benefit corporation.

FIFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant Dwayne Montgomery of the crime of **OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law § 175.35, committed as follows:

The defendant, in the County of New York, on or about August 13, 2020, knowing that a written instrument, to wit, a campaign contribution record (in the name of “Straw Donor-5”), 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, with the knowledge and belief that it would be filed with, registered and recorded in and otherwise become part of the records of such public office, public servant, public authority and public benefit corporation.

SIXTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant Dwayne Montgomery of the crime of **OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law § 175.35, committed as follows:

The defendant, in the County of New York, on or about August 13, 2020, knowing that a written instrument, to wit, a campaign contribution record (in the name of “Straw Donor-6”), 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, with the knowledge and belief that it would be filed with, registered and recorded in and otherwise become part of the records of such public office, public servant, public authority and public benefit corporation.

SEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant Dwayne Montgomery of the crime of **OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law § 175.35, committed as follows:

The defendant, in the County of New York, on or about August 14, 2020, knowing that a written instrument, to wit, a campaign contribution record (in the name of “Straw Donor-7”), 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, with the knowledge and belief that it would be filed with, registered and recorded in and otherwise become part of the records of such public office, public servant, public authority and public benefit corporation.

EIGHTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant Dwayne Montgomery of the crime of **OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law § 175.35, committed as follows:

The defendant, in the County of New York, on or about August 17, 2020, knowing that a written instrument, to wit, a campaign contribution record (in the name of “Straw Donor-8”), 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, with the knowledge and belief that it would be filed with, registered and recorded in and otherwise become part of the records of such public office, public servant, public authority and public benefit corporation.

NINTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant Dwayne Montgomery of the crime of **OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law § 175.35, committed as follows:

The defendant, in the County of New York, during the period from on or about August 17, 2020, to on or about August 19, 2020, knowing that a written instrument, to wit, a campaign contribution record (in the name of “UCC-1”), 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, with the knowledge and belief that it would be filed with, registered and recorded in and otherwise become part of the records of such public office, public servant, public authority and public benefit corporation.

TENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Dwayne Montgomery and Shamsuddin Riza of the crime of **OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law § 175.35, committed as follows:

The defendants, in the County of New York, during the period on or about July 27, 2021, to on or about August 25, 2021, knowing that a written instrument, to wit, a campaign contribution record (in the name of “Straw Donor-10”), 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, with the knowledge and belief that it would be filed with, registered and recorded in and otherwise become part of the records of such public office, public servant, public authority and public benefit corporation.

ELEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Dwayne Montgomery and Shamsuddin Riza of the crime of **OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law § 175.35, committed as follows:

The defendants, in the County of New York, during the period on or about July 27, 2021, to on or about August 30, 2021, knowing that a written instrument, to wit, a campaign contribution record (in the name of “Straw Donor-11”), 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, with the knowledge and belief that it would be filed with, registered and recorded in and otherwise become part of the records of such public office, public servant, public authority and public benefit corporation.

TWELFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Dwayne Montgomery and Shamsuddin Riza of the crime of **OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law § 175.35, committed as follows:

The defendants, in the County of New York, during the period on or about July 27, 2021, to on or about August 25, 2021, knowing that a written instrument, to wit, a campaign contribution record (in the name of “Straw Donor-12”), 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, with the knowledge and belief that it would be filed with, registered

and recorded in and otherwise become part of the records of such public office, public servant, public authority and public benefit corporation.

THIRTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Dwayne Montgomery and Shamsuddin Riza of the crime of **OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law § 175.35, committed as follows:

The defendants, in the County of New York, during the period on or about July 27, 2021, to on or about August 25, 2021, knowing that a written instrument, to wit, a campaign contribution record (in the name of “Straw Donor-13”), 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, with the knowledge and belief that it would be filed with, registered and recorded in and otherwise become part of the records of such public office, public servant, public authority and public benefit corporation.

FOURTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Dwayne Montgomery and Shamsuddin Riza of the crime of **OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law § 175.35, committed as follows:

The defendants, in the County of New York, during the period on or about July 27, 2021, to on or about August 25, 2021, knowing that a written instrument, to wit, a campaign contribution record (in the name of “Straw Donor-14”), 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, with the knowledge and belief that it would be filed with, registered and recorded in and otherwise become part of the records of such public office, public servant, public authority and public benefit corporation.

FIFTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Dwayne Montgomery and Shamsuddin Riza of the crime of **OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law § 175.35, committed as follows:

The defendants, in the County of New York, during the period on or about July 27, 2021, to on or about August 25, 2021, knowing that a written instrument, to wit, a campaign contribution record (in the name of “Straw Donor-15”), 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, with the knowledge and belief that it would be filed with, registered and recorded in and otherwise become part of the records of such public office, public servant, public authority and public benefit corporation.

SIXTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Dwayne Montgomery and Shamsuddin Riza of the crime of **OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law § 175.35, committed as follows:

The defendants, in the County of New York, during the period on or about July 27, 2021, to on or about August 25, 2021, knowing that a written instrument, to wit, a campaign contribution record (in the name of “Straw Donor-10”), 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, with the knowledge and belief that it would be filed with, registered

and recorded in and otherwise become part of the records of such public office, public servant, public authority and public benefit corporation.

SEVENTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Dwayne Montgomery and Shamsuddin Riza of the crime of **OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law § 175.35, committed as follows:

The defendants, in the County of New York, during the period on or about July 27, 2021, to on or about August 25, 2021, knowing that a written instrument, to wit, a campaign contribution record (in the name of “Straw Donor-17”), 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, with the knowledge and belief that it would be filed with, registered and recorded in and otherwise become part of the records of such public office, public servant, public authority and public benefit corporation.

EIGHTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Dwayne Montgomery, Shamsuddin Riza, Yahya Mushtaq, Shahid Mushtaq, and EcoSafety Consultants Inc. of the crime of **OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law § 175.35, committed as follows:

The defendants, in the County of New York, during the period from on or about July 15, 2021, to on or about August 25, 2021, knowing that a written instrument, to wit, a campaign contribution record (in the name of “Straw Donor-19”), 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, with the knowledge and belief that it would be filed with, registered and recorded in and otherwise become part of the records of such public office, public servant, public authority and public benefit corporation.

NINETEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Dwayne Montgomery, Shamsuddin Riza, Yahya Mushtaq, Shahid Mushtaq, and EcoSafety Consultants Inc. of the crime of **OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law § 175.35, committed as follows:



The defendants, in the County of New York, during the period from on or about July 15, 2021, to on or about August 25, 2021, knowing that a written instrument, to wit, a campaign contribution record (in the name of “Straw Donor-20”), 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, with the knowledge and belief that it would be filed with, registered and recorded in and otherwise become part of the records of such public office, public servant, public authority and public benefit corporation.

TWENTIETH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Dwayne Montgomery, Shamsuddin Riza, Yahya Mushtaq, Shahid Mushtaq, and EcoSafety Consultants Inc. of the crime of **OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law § 175.35, committed as follows:

The defendants, in the County of New York, during the period from on or about July 15, 2021, to on or about August 25, 2021, knowing that a written instrument, to wit, a campaign contribution record (in the name of “Straw Donor-21”), 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, with the knowledge and belief that it would be filed

with, registered and recorded in and otherwise become part of the records of such public office, public servant, public authority and public benefit corporation.

TWENTY-FIRST COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Dwayne Montgomery, Shamsuddin Riza, Yahya Mushtaq, Shahid Mushtaq, and EcoSafety Consultants Inc. of the crime of **OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law § 175.35, committed as follows:

The defendants, in the County of New York, during the period from on or about July 15, 2021, to on or about August 25, 2021, knowing that a written instrument, to wit, a campaign contribution record (in the name of “Straw Donor-23”), 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, with the knowledge and belief that it would be filed with, registered and recorded in and otherwise become part of the records of such public office, public servant, public authority and public benefit corporation.

TWENTY-SECOND COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Dwayne Montgomery, Shamsuddin Riza, and Millicent Redick of the crime of **ATTEMPTED OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law §§ 110/175.35, committed as follows:

The defendants, in the County of New York, during the period on or about August 25, 2021, to on or about November 9, 2021, knowing that a written instrument, to wit, a campaign contribution record (in the name of “Straw Donor-24”), 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, attempted to offer and present it to a public office, public servant, public authority and public benefit corporation, with the knowledge and belief that it would be filed with, registered and recorded in and otherwise become part of the records of such public office, public servant, public authority and public benefit corporation.

TWENTY-THIRD COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Dwayne Montgomery, Shamsuddin Riza, and Millicent Redick of the crime of **ATTEMPTED OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law §§ 110/175.35, committed as follows:

The defendants, in the County of New York, during the period on or about August 25, 2021, to on or about November 9, 2021, knowing that a written instrument, to wit, a campaign contribution record (in the name of “Straw Donor-25”), 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, attempted to offer and present it to a public office, public servant, public authority and public benefit corporation, with the knowledge and belief that it would be filed with, registered and recorded in and otherwise become part of the records of such public office, public servant, public authority and public benefit corporation.

TWENTY-FOURTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Dwayne Montgomery, Shamsuddin Riza, and Millicent Redick of the crime of **ATTEMPTED OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law §§ 110/175.35, committed as follows:

The defendants, in the County of New York, during the period on or about August 25, 2021, to on or about November 9, 2021, knowing that a written instrument, to wit, a campaign contribution record (in the name of “Straw Donor-26”), 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, attempted to offer and present it to a public office, public servant, public authority and public benefit corporation, with the knowledge and belief that it would be filed with,

registered and recorded in and otherwise become part of the records of such public office, public servant, public authority and public benefit corporation.

TWENTY-FIFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Dwayne Montgomery, Shamsuddin Riza, and Millicent Redick of the crime of **ATTEMPTED OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law §§ 110/175.35, committed as follows:

The defendant, in the County of New York, during the period on or about August 25, 2021, to on or about November 9, 2021, knowing that a written instrument, to wit, a campaign contribution record (in the name of “Straw Donor-27”), 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, attempted to offer and present it to a public office, public servant, public authority and public benefit corporation, with the knowledge and belief that it would be filed with, registered and recorded in and otherwise become part of the records of such public office, public servant, public authority and public benefit corporation.

TWENTY-SIXTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Dwayne Montgomery, Shamsuddin Riza, and Millicent Redick of the crime of

**ATTEMPTED OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law §§ 110/175.35, committed as follows:

The defendants, in the County of New York, during the period on or about August 25, 2021, to on or about November 9, 2021, knowing that a written instrument, to wit, a campaign contribution record (in the name of “Straw Donor-28”), 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, attempted to offer and present it to a public office, public servant, public authority and public benefit corporation, with the knowledge and belief that it would be filed with, registered and recorded in and otherwise become part of the records of such public office, public servant, public authority and public benefit corporation.

TWENTY-SEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Dwayne Montgomery, Shamsuddin Riza, and Millicent Redick of the crime of **ATTEMPTED OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law §§ 110/175.35, committed as follows:

The defendants, in the County of New York, during the period on or about August 25, 2021, to on or about November 9, 2021, knowing that a written instrument, to wit, a campaign contribution record (in the name of “Straw Donor-29”), 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, attempted to offer and present it to a public office, public servant, public authority and public benefit corporation, with the knowledge and belief that it would be filed with, registered and recorded in and otherwise become part of the records of such public office, public servant, public authority and public benefit corporation.

ALVIN L. BRAGG, JR.  
District Attorney

7th Additional Grand Jury for the 1st Term; GJ Case # 3I

Filed:

NA

No.

THE PEOPLE OF THE STATE OF NEW YORK

-against-

DWAYNE MONTGOMERY,  
SHAMSUDDIN RIZA,  
MILLICENT REDICK,  
RONALD PEEK,  
YAHYA MUSHTAQ,  
SHAHID MUSHTAQ, and  
ECOSAFETY CONSULTANTS INC.,

Defendants.

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INDICTMENT

CONSPIRACY IN THE FIFTH DEGREE, P.L. § 105.05 (all defendants)  
ATTEMPTED GRAND LARCENY IN THE THIRD DEGREE, P.L. § 155.35(1) (all defendants);  
OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, P.L. § 175.35 (Dwayne Montgomery, 19 counts; Shamsuddin Riza, 12 counts; Yahya Mushtaq, 4 counts; Shahid Mushtaq, 4 counts; EcoSafety Consultants, Inc., 4 counts)  
ATTEMPTED OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, P.L. § 175.35 (Dwayne Montgomery, Shamsuddin Riza, and Millicent Redick, 6 counts each)

ALVIN L. BRAGG, JR., District Attorney

A True Bill

James J. Hanley  
Zachary Weintraub  
Rackets Bureau

Foreman