

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

THE PEOPLE OF THE STATE OF NEW YORK

-against-

TRI-STATE LUMBER, LTD.,  
TS SUPPLIES, INC.,  
LEAH GUTTMAN,  
ISRAEL WIESENFELD,  
BRENDA NEUSTADT, A/K/A BRUCHA  
NEUSTADT, A/K/A BRUCHA LANDAU,

Defendants.

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendants 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 and elsewhere, during the period from on or about October 8, 2018, to on or about November 9, 2021, with the intent that conduct constituting the felonies of Grand Larceny in the Fourth Degree, Falsifying Business Records in the First 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

The purpose of the conspiracy was for Tri-State Lumber, Ltd. (“Tri-State”), a construction material supplier, to assist certain construction company clients by falsifying documents to make it appear that the construction company clients purchased construction materials from a New York State certified Minority or Woman-owned Business Enterprise (“M/WBE”), when, in fact, the materials were being purchased from and supplied by Tri-State, a non-M/WBE firm. To accomplish the objective of the conspiracy, Israel Wiesenfeld and Leah Guttman, the Tri-State managers who directed the scheme, and Brenda Neustadt a/k/a Brucha Neustadt a/k/a Brucha Landau (“Brenda Neustadt”), a Tri-State employee, who assisted Israel Wiesenfeld, Leah Guttman, and others, by creating and sending false documents, conducting financial transactions, and interfacing with other conspirators. The New York State Homes & Community Renewal (“HCR”) and New York City Housing Preservation & Development (“HPD”) agencies, each of which are headquartered in New York County, require that construction projects receiving public loans, grants, and other subsidies meet M/WBE participations goals as set forth in contracts, commitments, and other related documents. To meet a project’s M/WBE goals, construction management (“CM”) companies and general contractors (“GC”) either hire M/WBE firms directly and/or rely on commitments made by non-M/WBE subcontractors to contract with M/WBE firms.

Tri-State benefited from its participation in the scheme by retaining the business of clients who would have purchased materials from other firms, specifically, M/WBE firms that could supply the materials. It was part of the conspiracy for Tri-State to accept orders and deliver materials to the construction company clients participating in the scheme and make it appear that the orders were being received and the materials were being supplied by Eco Geek Living, Inc. (“Eco Geek”), a New York State certified M/WBE. Eco Geek did not receive orders from the participating construction company clients and did not supply materials, but rather, assisted in falsifying business documents to make it appear that it supplied the materials so that the construction company clients could receive M/WBE participation credits on the government subsidized projects. Tri-State typically directed the participating construction company clients to send the checks payable to Eco Geek to Tri-State’s office so that Tri-State could deposit the checks into Eco Geek’s corporate account using an Eco Geek debit card that Tri-State possessed and controlled. To conceal the source and owner of the monies, and to conceal and promote the ongoing nature of the M/WBE scheme, Tri-State and Eco Geek used a bank account held by TS Supplies, Inc., a shell company controlled by Israel Wiesenfeld and Tri-State.

In addition to creating the paper trail for the participating construction company clients so they could fraudulently inflate their M/WBE participation, it was also part of the conspiracy for Tri-State, in coordination with JM3 Construction LLC and its owners and executives, to file a fraudulent mechanics lien related to a project for which JM3 Construction LLC did not owe Tri-State money. Tri-State and JM3 Construction LLC attempted to obtain funds from JM3 Construction LLC’s client to cover other monies owed to Tri-State on unrelated client projects.

## OVERT ACTS

In furtherance of said conspiracy and to effect the objects thereof, during the period from on or about October 8, 2018, to on or about November 9, 2021, the following overt acts, among others, were committed:

1. On or about October 8, 2018, Leah Guttman met with co-conspirator-1 (“CC-1”), the principal and sole employee of Eco Geek, to discuss the M/WBE scheme.
2. On or about October 9, 2018, Israel Wiesenfeld sent an email to a software vendor, copying Leah Guttman and Brenda Neustadt, stating in substance “The invoices in company 2 should have this name and logo.” The email attached a quote from Eco Geek, which included an image of a logo in the name of Eco Geek.
3. On or about October 11, 2018, CC-1 opened a new bank account for Eco Geek.
4. On the same date, CC-1 and Leah Guttman had a text message exchange about the opening of the new Eco Geek bank account.
5. On or about October 12, 2018, Israel Wiesenfeld recorded a voice message, sent via WhatsApp, which stated in substance, “Make sure the invoices for the customer, she sends it to that email address, not to Tri-State Lumber, and you have to email it to the customer from that email address. It can’t be a Tri-State Lumber chain here.”
6. On or about October 15, 2018, an employee of Tri-State opened an email account with Google, Inc. in the name of Eco Geek Living, Inc. (“the Gmail Account”). Brenda Neustadt’s cellphone number was listed as the Gmail Account’s recovery account contact number.

7. On or about October 17, 2018, Leah Guttman executed a form adding herself as a signatory on the new Eco Geek bank account.
8. On or about October 17, 2018, Brenda Neustadt emailed CC-1 and instructed her to send all Eco Geek invoices to the Gmail Account, which would be accessed by Brenda Neustadt and Tri-State.
9. On or about October 25, 2018, CC-1 sent Leah Guttman a text message concerning a check from Client-1, asking whether Eco Geek should issue Tri-State a check once the check from Client-1 had cleared. Leah Guttman replied in substance, “Or maybe we can do a wire. Less 3% from subtotal. I’ll have Brenda email you breakdown for approval.”
10. On or about November 18, 2018, Israel Wiesenfeld sent an email to Brenda Neustadt attaching an order confirmation purporting to represent a sale of materials from Tri-State to Eco Geek, but to be shipped to Client-2. The body of the email stated in substance, “Please Invoice. And also check if there are any tickets on the [Eco Geek] account which weren’t invoiced yet.”
11. On or about December 11, 2018, Israel Wiesenfeld recorded a voice message, sent via WhatsApp, which stated in substance, “Under the Eco Geek account, there’s money owed from one guy who was COD. I don’t remember the name off the top of my head, I think we shipped him to South 5<sup>th</sup> or North 5<sup>th</sup>, did you ever get that money? I think I discussed with you about two weeks ago.”
12. On or about December 13, 2018, CC-1 sent Leah Guttman a text message asking for the total value of the contracts that Eco Geek had with Client-1 and JM3 Construction LLC to use in

renewing the M/WBE certification for Eco Geek. Leah Guttman responded in substance, “[JM3 Construction LLC] had to give sheetrock elsewhere so that’s less. Let me look at the other so you have apx for 2019.”

13. From on or about December 20, 2018, to on or about December 21, 2018, Brenda Neustadt and CC-1 exchanged a series of emails in which Brenda Neustadt asked CC-1 to make a check payable to TS Supplies, Inc. CC-1 replied that she can switch the name and that she has a check ready for when JM3 Construction LLC submitted a payment.
14. On or about January 2, 2019, CC-1 executed an HCR Affirmation of Income Payments form falsely representing that Eco Geek had sold materials to JM3 Construction LLC, when Tri-State had sold and supplied the materials. CC-1 provided the form to JM3 Construction LLC so it could file the form with HCR in New York County in connection with the project’s M/WBE participation requirement.
15. On or about March 26, 2019, CC-1 executed an HCR Affirmation of Income Payments form falsely representing that Eco Geek sold materials to JM3 Construction LLC, when Tri-State had sold and supplied the materials. CC-1 provided the form to JM3 Construction LLC so it could file the form with HCR in New York County in connection with the project’s M/WBE participation requirement.
16. On or about May 22, 2019, Brenda Neustadt sent an email to CC-1 copying Leah Guttman and attaching invoice number 328624, which purported to represent a sale of materials from Tri-State to Eco Geek that were to be shipped to Big Apple Designers, Inc.

17. On or about May 22, 2019, CC-1 created an invoice on Eco Geek letterhead with invoice number 328624. That invoice was identical to invoice number 328624, in the number of items, item descriptions, the number of each of them, price per unit, the total price per item, the total amount due, and the shipping address, however, this invoice listed the items as being sold by Eco Geek to Big Apple Designers, Inc.
18. On or about June 4, 2019, Israel Wiesenfeld recorded a voice message, sent via WhatsApp, which stated in substance, "Please check for Isaac from Velocity, from Big Apple, the minority certificates for Eco Geek."
19. On or about July 1, 2019, CC-1 executed an HCR Affirmation of Income Payments form falsely representing that Eco Geek sold materials to JM3 Construction LLC, when Tri-State had sold and supplied the materials. CC-1 provided the form to JM3 Construction LLC so it could file the form with HCR in New York County in connection with the project's M/WBE participation requirement.
20. On or about July 1, 2019, CC-1 sent a text message to Leah Guttman informing her that a Tri-State employee was mistakenly sending invoices to both CC-1 and Big Apple Designers, Inc. Leah Guttman responded by asking who was sending the emails, and stated in substance that she would "let him know."
21. On or about August 9, 2019, Israel Wiesenfeld sent an email to Brenda Neustadt and two other Tri-State employees, with the subject Eco Geek, and stated in substance, "Brenda will give you invoices were to apply." Attached to the email was an image of a check from TS

Supplies, Inc., to Tri-State for approximately \$38,813.97. The memo line identified Big Apple Designers, Inc.

22. On or about September 27, 2019, CC-1 executed an HCR Affirmation of Income Payments form falsely representing that Eco Geek sold materials to JM3 Construction LLC, when Tri-State had sold and supplied the materials. CC-1 provided the form to JM3 Construction LLC so it could file the form with HCR in New York County in connection with the project's M/WBE participation requirement.
23. On or about October 4, 2019, CC-1 executed an HCR Affirmation of Income Payments form falsely representing that Eco Geek sold materials to Big Apple Designers, Inc., when Tri-State had sold and supplied the materials. CC-1 provided the form to Big Apple Designers, Inc. so it could file the form with HCR in New York County in connection with the project's M/WBE participation requirement.
24. On or about October 7, 2019, in response to an email request by Big Apple Designers, Inc. for a signed Affidavit of Payment, CC-1 emailed a copy of a signed falsified Affidavit of Payment to Big Apple Designers, Inc. and to the Eco Geek Gmail account. The Affidavit of Payment, related to the project at 11 West 118<sup>th</sup> Street in New York County, was falsified in that it stated that Eco Geek furnished materials, equipment, or other goods to Big Apple Designers, Inc. in exchange for approximately \$5,710.98, which had already been paid, when, in fact, Eco Geek did not furnish any such items and payment had not yet been made.

25. On or about October 24, 2019, Brenda Neustadt texted CC-1 that Big Apple Designers, Inc. delivered to Tri-State the check for the payment associated with the 11 West 118<sup>th</sup> Street Affidavit of Payment and that Brenda Neustadt would deposit it.
26. On or about November 20, 2019, Brenda Neustadt sent a text message to CC-1 stating in substance, “disregard the invoices I just sent you for [Big Apple Designers, Inc.’s construction project]. Only partial job needs to be thru minority group. So you don’t need to add them in.”
27. On or about January 14, 2020, Leah Guttman sent two text messages to CC-1, which stated in substance, “I’m trying to get a job with [JM3 Construction LLC] on 108<sup>th</sup> street in the city. Now they are telling me I need to let go \$ to get it. Can we do on this ownership 2%? . . . Trying to make sure we don’t lose it. It’s not very big jobs but a decent normal size that I don’t want [non-M/WBE Competitor-1] to get.”
28. On or about January 14, 2020, CC-1 replied via text message that she would accept a 2% fee on the 108<sup>th</sup> Street project in New York County.
29. On or about February 4, 2020, CC-1 executed an HCR Affirmation of Income Payments form falsely representing that Eco Geek had sold materials to Big Apple Designers, Inc., when Tri-State had sold and supplied the materials. CC-1 provided the form to Big Apple Designers, Inc. so it could be filed with HCR in New York County in connection with the project’s M/WBE participation requirement.
30. On or about May 28, 2020, Brenda Neustadt, using the Eco Geek Gmail Account, emailed CC-1, informing CC-1 that JM3 Construction LLC would be mailing her a check, and giving

CC-1 a breakdown of the amount of tax and the 2% fee for each of three numbered invoices, as well as the total amount that Eco Geek should pay to TS Supplies, Inc.

31. On or about July 14, 2020, Israel Wiesenfeld sent two WhatsApp messages to Leah Guttman, which stated in substance, “U have to put pressure like I do with [Big Apple Designers, Inc.] that the only way this mbe woman does it is if we get paid in 60 days otherwise I have to rebill him under [JM3 Construction LLC] and he will lose the minority . . . Tell him that she threatened us that she will cancel this job from her minority roster.”
32. On or about August 21, 2020, Brenda Neustadt sent a text message to CC-1, stating in substance, “[Israel Wiesenfeld] is upstate and really wants to deposit the [Big Apple Designers, Inc.’s] check today. Chase is closed there. Can you give me your log in info so he can deposit it from phone?”
33. On or about December 9, 2020, Brenda Neustadt sent an email to a Tri-State client with the subject name “MWBE.” The email stated in substance, “Here you go. Will send you the actual certificate too.” The client replied in substance, via email, “Okay great! I will show this to my boss and let him know. Tri-State Lumber itself however is not considered a WBE, correct? Only when doing business through Eco Geek Living Inc?”
34. On or about February 21, 2021, Israel Wiesenfeld sent a text message to CC-1, which stated in substance, “I was wondering if u can make an atm card for the account which we deposit money for eco geek Lately the bank branches around me close early or don’t open at all. An atm card would allow me to make deposits all day and night.”

35. On or about February 21, 2021, CC-1 replied in substance to Israel Wiesenfeld via text message, “I spoke with Brenda about this. Sure. I will speak to the branch about this tomorrow. Believe it or not, I don’t even have an atm card for this account. There was no need. So let me see what I can do on Monday. Shouldn’t be a big issue.”
36. On or about March 2, 2021, Leah Guttman, CC-1, and Lawrence Wecker, a principal of JM3 Construction LLC, had a telephone conversation in New York County, during which Lawrence Wecker asked whether CC-1’s M/WBE certification would permit JM3 Construction LLC to falsely list Eco Geek as a labor subcontractor on a project to enable JM3 Construction LLC to increase its M/WBE participation. During the conversation, Lawrence Wecker stated in substance, “What I would like to do with you is work something out. So like, I would give, you would give my, you would give me a contract, say for installing the sheetrock . . . and then you would turn around and sub it out to my guy that will really do the sheetrock . . . there will be a spread in there for you.”
37. On or about March 9, 2021, Leah Guttman sent a text message to CC-1 asking how she calculates “her percent,” and further explaining that Brenda Neustadt is unavailable and that Leah Guttman was trying to assist another Tri-State employee to complete the calculation.
38. On or about March 11, 2021, CC-1 executed an HCR Affirmation of Income Payments form falsely representing that Eco Geek had sold materials to Big Apple Designers, Inc., when Tri-State had sold and supplied the materials. CC-1 provided the form to Big Apple Designers, Inc. so it could be filed with HCR in New York County in connection with the project’s M/WBE participation requirement.

39. On or about April 7, 2021, CC-1 executed an HCR Affirmation of Income Payments form falsely representing that Eco Geek had sold materials to Big Apple Designers, Inc., when Tri-State had sold and supplied the materials. CC-1 provided the form to Big Apple Designers, Inc. so it could be filed with HCR in New York County in connection with the project's M/WBE participation requirement.
40. On or about April 9, 2021, Leah Guttman and Lawrence Wecker had a telephone conversation in New York County, during which they discussed Tri-State's pass-through arrangement with Eco Geek. Leah Guttman stated in substance, "The material comes from us ... I pay her the percentage ... We just use her for the billing ... When you need material you need to speak to me. We just bill it through her, you get me? ... We typically pay her, just so you have an idea, we typically pay her 3% ... What she does is, the check goes into her bank account ... And we take the money out once she lets us know that a check came. Most of the time we know before she knows, or she could just write you a check back and she can overnight it."
41. On or about April 13, 2021, Israel Wiesenfeld sent an email to CC-1 attaching an invoice purportedly showing a sale from Tri-State to Eco Geek, for materials to be delivered to General Contractor-6. CC-1 replied to Israel Wiesenfeld, Leah Guttman, and Brenda Neustadt, and asked in substance if the invoice pertained to a new project. Leah Guttman replied in substance that it did and that she would send further information later.
42. On or about April 23, 2021, CC-1 executed an HCR Affirmation of Income Payments form falsely representing that Eco Geek had sold materials to Big Apple Designers, Inc., when Tri-

State had sold and supplied the materials. CC-1 provided the form to Big Apple Designers, Inc. so it could file the form with HCR in New York County in connection with the project's M/WBE participation requirement.

43. On or about April 26, 2021, Leah Guttman, using the Eco Geek Gmail Account, sent an email to General Contractor-6 identifying herself as an employee of Eco Geek to representatives from General Contractor-6, and stated in substance that Eco Geek was a “dealer and seller (not a BROKER) . . . We have supplied big projects in the Tristate area with no issues on the sales amount submitted. Our customers [were] able to get credit on the full amount submitted.”
44. On or about June 24, 2021, CC-1 executed an Affirmation of Income Payment form falsely representing that Eco Geek had sold materials to Big Apple Designers, Inc., when Tri-State had sold and supplied the materials. CC-1 provided the form to Big Apple Designers, Inc. so that it could file the form in connection with the project's M/WBE participation requirement.
45. On or about June 25, 2021, Brenda Neustadt sent a text message to CC-1, stating in substance, “another issue, we got a new secretary a couple months back and she wasn't aware that [Big Apple Designers, Inc.'s construction project: 50 Nevins Street, Brooklyn, New York] belongs under eco geek. So we have lots of invoices that need to be transferred over . . . They secured me a check for around 100k towards that. I will be in touch w you later today or Monday to give you a total \$\$ breakdown.”

46. On or about July 1, 2021, CC-1 executed an HCR Affirmation of Income Payments form falsely representing that Eco Geek had sold materials to Big Apple Designers, Inc., when Tri-State had sold and supplied the materials. CC-1 provided the form to Big Apple Designers, Inc. so it could file the form with HCR in New York County in connection with the project's M/WBE participation requirement.
47. On or about July 16, 2021, CC-1 executed an HCR Affirmation of Income Payments form falsely representing that Eco Geek had sold materials to General Contractor-6, when Tri-State had sold and supplied the materials. CC-1 provided the form to General Contractor-6 so it could file the form with HCR in New York County in connection with the project's M/WBE participation requirement.
48. On or about July 17, 2021, CC-1 executed an HCR Affirmation of Income Payments form falsely representing that Eco Geek had sold materials to Big Apple Designers, Inc., when Tri-State had sold and supplied the materials. CC-1 provided the form to Big Apple Designers, Inc. so it could file the form with HCR in New York County in connection with the project's M/WBE participation requirement.
49. On or about August 31, 2021, Israel Wiesenfeld sent a message via WhatsApp, which contained a screenshot of a text message exchange between Israel Wiesenfeld and Big Apple Designers, Inc.'s Treasurer, in which Israel Wiesenfeld stated in substance, "347 Henry \$2550 50 nevins 57,450 . . . Need 60k for eco geek."
50. On or about August 31, 2021, Israel Wiesenfeld sent a message via WhatsApp, which contained a screenshot of a text message exchange between Israel Wiesenfeld and Big Apple

Designers, Inc.'s Treasurer, in which the Treasurer replied in substance, "Told you on it . . . I didn't forget."

51. On or about September 9, 2021, Leah Guttman and Lawrence Wecker had a telephone conversation in New York County, during which Leah Guttman discussed JM3 Construction LLC's open balances on its Eco Geek and "regular" accounts.
52. On or about September 14, 2021, Leah Guttman and Lawrence Wecker had a telephone conversation in New York County, during which they discussed having Tri-State file a mechanic's lien on a construction project located in Stamford, Connecticut even though JM3 Construction LLC did not owe Tri-State any money for materials for the project. Leah Guttman stated in substance, "You don't owe me . . . you told me I should put [the lien] for everything that you guys bought on [the Stamford, Connecticut project] . . . so we're gonna put 324,760, if we get the money, we're gonna write you a check."
53. On or about September 14, 2021, Leah Guttman and Lawrence Wecker had another telephone conversation in New York County, during which Leah Guttman stated in substance that the actual amount that Tri-State invoiced JM3 Construction LLC on the Stamford, Connecticut project was approximately \$222,465, and asked "you want me to do it for a bigger amount?" Lawrence Wecker responded in substance "You've gotta justify, we might have to justify your bills. I mean, if you want to switch them over . . . I would just put a lien on, you know, and then work up your bills to it. Just to lien it, you don't need nothing now . . . so file a lien for like 340, 330."

54. On or about September 15, 2021, Leah Guttman and Lawrence Wecker had a telephone conversation during which Leah Guttman stated in substance, “I told her to put \$322,000 . . . You only bought for 222, but whatever we’ll get, we’ll update you.” Leah Guttman further stated in substance that the amount of money JM3 Construction LLC owed to Tri-State on projects unrelated to the Stamford, Connecticut project was approximately \$285,000 between the regular account and the Eco Geek account.
55. On or about September 17, 2021, Israel Wiesenfeld, as Tri-State’s vice-president, signed a false mechanics lien request form alleging that JM3 Construction LLC owed \$322,465.79 to Tri-State for material sold to JM3 Construction LLC for the Stamford, Connecticut project.
56. On or about October 14, 2021, CC-1 executed an HCR Affirmation of Income Payments form falsely representing that Eco Geek had sold materials to Big Apple Designers, Inc., when Tri-State had sold and supplied the materials. CC-1 provided the form to Big Apple Designers, Inc. so it could file the form with HCR in New York County in connection with the project’s M/WBE participation requirement.
57. On or about November 8, 2021, an agent for Tri-State filed with the Town Clerk, City of Stamford, a Notice Under Mechanic’s Lien Law that stated in substance that JM3 Construction LLC owed \$322,465.79 to Tri-State for material sold to JM3 Construction LLC for the JM3 Construction LLC Stamford, Connecticut project from January, 4, 2021, to May 25, 2021.
58. On or about November 8, 2021, CC-1 emailed Israel Wiesenfeld new bank account information for Eco Geek and asked whether she should send the ATM card for the account

to TS Supplies, Inc. at 924 51<sup>st</sup> Street, Brooklyn, New York. Israel Wiesenfeld replied in substance, copying Leah Guttman and Brenda Neustadt, that CC-1 should send the ATM card, and informed her that TS Supplies, Inc. would also be changing banks and that Israel Wiesenfeld would provide that information the next day.

59. On or about November 9, 2021, Brenda Neustadt, using the Eco Geek Gmail Account, and copying Leah Guttman, replied to an email from General Contractor-3 requesting that Eco Geek execute a lien waiver pertaining to a construction project involving JM3 Construction LLC. Attached to the email was a forged Partial Waiver of Lien and Indemnification and a forged General Release pertaining to JM3 Construction LLC. The two documents were forged in that they purported to have been electronically signed by CC-1, however, CC-1 did not sign the documents and did not give permission or authority to anyone to sign them.

## SECOND COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Tri-State Lumber, Ltd., Leah Guttman, Israel Wiesenfeld, and Brenda Neustadt a/k/a Brucha Neustadt a/k/a Brucha Landau, of the crime of **SCHEME TO DEFRAUD IN THE FIRST DEGREE**, in violation of Penal Law § 190.65(1)(b), committed as follows:

The defendants, in the County of New York and elsewhere, during the period from on or about October 8, 2018, to on or about November 9, 2021, engaged in a scheme constituting a systematic ongoing course of conduct with intent to defraud more than one person and to obtain property from more than one person, to wit, multiple general contractor firms and government

entities, by false and fraudulent pretenses, representations and promises, and so obtained property with a value in excess of one thousand dollars from one or more such persons.

THIRD COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Tri-State Lumber, Ltd., Leah Guttman, Israel Wiesenfeld, and Brenda Neustadt a/k/a Brucha Neustadt a/k/a Brucha Landau, of the crime **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about January 2, 2019, with intent to defraud, and to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of General Contractor-1 (“GC-1”), to wit, a New York State Homes and Community Renewal (“HCR”) affirmation of income payment to M/WBE document.

FOURTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Tri-State Lumber, Ltd., Leah Guttman, Israel Wiesenfeld, and Brenda Neustadt a/k/a Brucha Neustadt a/k/a Brucha Landau, of the crime **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about October 1, 2019, with intent to defraud, and to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of General Contractor-1 (“GC-1”), to wit, a New York State Homes and Community Renewal (“HCR”) affirmation of income payment to M/WBE document.

FIFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants Tri-State Lumber, Ltd., Leah Guttman, Israel Wiesenfeld, and Brenda Neustadt a/k/a Brucha Neustadt a/k/a Brucha Landau, of the crime of **OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law § 175.35(1), committed as follows:

The defendants, in the County of New York, on or about January 11, 2019, knowing that a written instrument, to wit, a New York City Housing Preservation and Development (“HPD”) compliance audit response, contained a false statement and false information, and with intent to defraud the state and any political subdivision, public authority, and public benefit corporation, 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 defendants Tri-State Lumber, Ltd., Leah Guttman, Israel Wiesenfeld, and Brenda Neustadt a/k/a Brucha Neustadt a/k/a Brucha Landau, of the crime of **OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law § 175.35(1), committed as follows:

The defendants, in the County of New York, on or about April 16, 2019, knowing that a written instrument, to wit, a New York City Housing Preservation and Development (“HPD”) compliance audit response, contained a false statement and false information, and with intent to defraud the state and any political subdivision, public authority, and public benefit corporation, 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 defendants Tri-State Lumber, Ltd., Leah Guttman, Israel Wiesenfeld, and Brenda Neustadt a/k/a Brucha Neustadt a/k/a Brucha Landau, of the crime of **OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law § 175.35(1), committed as follows:

The defendants, in the County of New York, on or about January 2, 2019, knowing that a written instrument, to wit, a New York State Homes and Community Renewal (“HCR”) M/WBE

payment affirmation, contained a false statement and false information, and with intent to defraud the state and any political subdivision, public authority, and public benefit corporation, 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 defendants Tri-State Lumber, Ltd., Leah Guttman, Israel Wiesenfeld, and Brenda Neustadt a/k/a Brucha Neustadt a/k/a Brucha Landau, of the crime of **OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law § 175.35(1), committed as follows:

The defendants, in the County of New York, on or about March 26, 2019, knowing that a written instrument, to wit, a New York State Homes and Community Renewal (“HCR”) M/WBE payment affirmation, contained a false statement and false information, and with intent to defraud the state and any political subdivision, public authority, and public benefit corporation, 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 defendants Tri-State Lumber, Ltd., Leah Guttman, Israel Wiesenfeld, and Brenda Neustadt a/k/a Brucha Neustadt a/k/a Brucha Landau, of the crime of **OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law § 175.35(1), committed as follows:

The defendants, in the County of New York, on or about July 1, 2019, knowing that a written instrument, to wit, a New York State Homes and Community Renewal (“HCR”) M/WBE payment affirmation, contained a false statement and false information, and with intent to defraud the state and any political subdivision, public authority, and public benefit corporation, 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 Tri-State Lumber, Ltd., Leah Guttman, Israel Wiesenfeld, and Brenda Neustadt a/k/a Brucha Neustadt a/k/a Brucha Landau, of the crime of **OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law § 175.35(1), committed as follows:

The defendants, in the County of New York, during the period from on or about September 27, 2019, to on or about October 1, 2019, knowing that a written instrument, to wit, a New York

State Homes and Community Renewal (“HCR”) M/WBE payment affirmation, contained a false statement and false information, and with intent to defraud the state and any political subdivision, public authority, and public benefit corporation, 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 Tri-State Lumber, Ltd., Leah Guttman, Israel Wiesenfeld, and Brenda Neustadt a/k/a Brucha Neustadt a/k/a Brucha Landau, of the crime **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about August 30, 2021, with intent to defraud, and to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of General Contractor-2 (“GC-2”), to wit, a purported labor/materials subcontract.

TWELFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Tri-State Lumber, Ltd., Leah Guttman, Israel Wiesenfeld, and Brenda Neustadt a/k/a Brucha Neustadt a/k/a Brucha Landau, of the crime **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York, on or about October 12, 2021, with intent to defraud, and to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of General Contractor-2 (“GC-2”), to wit, an Eco Geek Living, Inc. M/WBE account statement.

THIRTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Tri-State Lumber, Ltd., Leah Guttman, Israel Wiesenfeld, and Brenda Neustadt a/k/a Brucha Neustadt a/k/a Brucha Landau, of the crime **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York, on or about September 27, 2021, with intent to defraud, and to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of General Contractor-3 (“GC-3”), to wit, the National Urban League project workforce and contractor diversity documents.

FOURTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Tri-State Lumber, Ltd., Leah Guttman, Israel Wiesenfeld, and Brenda Neustadt a/k/a Brucha Neustadt a/k/a Brucha Landau, of the crime **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about and between November 4, 2021, and November 9, 2021, with intent to defraud, and to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of General Contractor-3 (“GC-3”), to wit, a lien waiver.

FIFTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Tri-State Lumber, Ltd., Leah Guttman, Israel Wiesenfeld, and Brenda Neustadt a/k/a Brucha Neustadt a/k/a Brucha Landau, of the crime **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York, on or about November 11, 2019, with intent to defraud, and to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of General Contractor-4 (“GC-4”), to wit, a Sub-Tier Subcontractor/Supplier Release, Waiver and Affidavit of Payment document.

SIXTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Tri-State Lumber, Ltd., Leah Guttman, Israel Wiesenfeld, and Brenda Neustadt a/k/a Brucha Neustadt a/k/a Brucha Landau, of the crime **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York, on or about May 13, 2020, with intent to defraud, and to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of General Contractor-4 (“GC-4”), to wit, a Sub-Tier Subcontractor/Supplier Release, Waiver and Affidavit of Payment document.

SEVENTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Tri-State Lumber, Ltd., Leah Guttman, Israel Wiesenfeld, and Brenda Neustadt a/k/a Brucha Neustadt a/k/a Brucha Landau, of the crime of **OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law § 175.35(1), committed as follows:

The defendants, in the County of New York, during the period on or about October 15, 2021, to on or about October 20, 2021, knowing that a written instrument, to wit, a New York City Housing Preservation and Development (“HPD”) compliance audit response, contained a false statement and false information, and with intent to defraud the state and any political subdivision, public authority, and public benefit corporation, 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 Tri-State Lumber, Ltd., Leah Guttman, Israel Wiesenfeld, and Brenda Neustadt a/k/a Brucha Neustadt a/k/a Brucha Landau, of the crime **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about July 17, 2020, with intent to defraud, and to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of General Contractor-5 (“GC-5”), to wit, a New York State Homes and Community Renewal (“HCR”) affirmation of income document.

NINETEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Tri-State Lumber, Ltd., Leah Guttman, Israel Wiesenfeld, and Brenda Neustadt a/k/a Brucha Neustadt a/k/a Brucha Landau, of the crime **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about October 14, 2021, with intent to defraud, and to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of General Contractor-5 (“GC-5”), to wit, a New York State Homes and Community Renewal (“HCR”) affirmation of income document.

TWENTIETH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Tri-State Lumber, Ltd., Leah Guttman, Israel Wiesenfeld, and Brenda Neustadt a/k/a Brucha Neustadt a/k/a Brucha Landau, of the crime of **OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law § 175.35(1), committed as follows:

The defendants, in the County of New York, during the period from on or about July 17, 2020, to on or about August 25, 2020, knowing that a written instrument, to wit, a New York State Homes and Community Renewal (“HCR”) M/WBE payment affirmation, contained a false statement and false information, and with intent to defraud the state and any political subdivision, public authority, and public benefit corporation, 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 Tri-State Lumber, Ltd., Leah Guttman, Israel Wiesenfeld, and Brenda Neustadt a/k/a Brucha Neustadt a/k/a Brucha Landau, of the crime of **OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law § 175.35(1), committed as follows:

The defendants, in the County of New York, during the period from on or about March 11, 2021, to on or about April 1, 2021, knowing that a written instrument, to wit, a New York State Homes and Community Renewal (“HCR”) M/WBE payment affirmation, contained a false statement and false information, and with intent to defraud the state and any political subdivision, 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 Tri-State Lumber, Ltd., Leah Guttman, Israel Wiesenfeld, and Brenda Neustadt a/k/a Brucha Neustadt a/k/a Brucha Landau, of the crime of **OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law § 175.35(1), committed as follows:

The defendants, in the County of New York, during the period from on or about February 4, 2021, to on or about February 10, 2021, knowing that a written instrument, to wit, a New York

State Homes and Community Renewal (“HCR”) M/WBE payment affirmation, contained a false statement and false information, and with intent to defraud the state and any political subdivision, public authority, and public benefit corporation, 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-THIRD COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Tri-State Lumber, Ltd., Leah Guttman, Israel Wiesenfeld, and Brenda Neustadt a/k/a Brucha Neustadt a/k/a Brucha Landau, of the crime of **OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law § 175.35(1), committed as follows:

The defendants, in the County of New York, during the period from on or about April 7, 2021, to on or about April 9, 2021, knowing that a written instrument, to wit, a New York State Homes and Community Renewal (“HCR”) M/WBE payment affirmation, contained a false statement and false information, and with intent to defraud the state and any political subdivision, public authority, and public benefit corporation, 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-FOURTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Tri-State Lumber, Ltd., Leah Guttman, Israel Wiesenfeld, and Brenda Neustadt a/k/a Brucha Neustadt a/k/a Brucha Landau, of the crime of **OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law § 175.35(1), committed as follows:

The defendants, in the County of New York, during the period from on or about July 1, 2021, to on or about July 27, 2021, knowing that a written instrument, to wit, a New York State Homes and Community Renewal (“HCR”) M/WBE payment affirmation, contained a false statement and false information, and with intent to defraud the state and any political subdivision, public authority, and public benefit corporation, 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-FIFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Tri-State Lumber, Ltd., Leah Guttman, Israel Wiesenfeld, and Brenda Neustadt a/k/a Brucha Neustadt a/k/a Brucha Landau, of the crime of **OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law § 175.35(1), committed as follows:

The defendants, in the County of New York, during the period from on or about October 14, 2021, to on or about October 28, 2021, knowing that a written instrument, to wit, a New York

State Homes and Community Renewal (“HCR”) M/WBE payment affirmation, contained a false statement and false information, and with intent to defraud the state and any political subdivision, public authority, and public benefit corporation, 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-SIXTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Tri-State Lumber, Ltd., Leah Guttman, Israel Wiesenfeld, and Brenda Neustadt a/k/a Brucha Neustadt a/k/a Brucha Landau, of the crime **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York, during the period from on or about June 24, 2021, to on or about July 13, 2021, with intent to defraud, and to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of Consulting Company-1, to wit, M/WBE compliance documents.

TWENTY-SEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Tri-State Lumber, Ltd., Leah Guttman, Israel Wiesenfeld, and Brenda Neustadt a/k/a Brucha Neustadt a/k/a Brucha Landau, of the crime **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, during the period from on or about April 13, 2021, to on or about April 21, 2021, with intent to defraud, and to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of General Contractor-6 (“GC-6”), to wit, Eco Geek Living, Inc. invoice.

TWENTY-EIGHTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Tri-State Lumber, Ltd., Leah Guttman, Israel Wiesenfeld, and Brenda Neustadt a/k/a Brucha Neustadt a/k/a Brucha Landau, of the crime **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about July 16, 2021, with intent to defraud, and to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of General Contractor-6 (“GC-6”), to wit, a New York State Homes and Community Renewal (“HCR”) affirmation of income document.

TWENTY-NINTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Tri-State Lumber, Ltd., Leah Guttman, Israel Wiesenfeld, and Brenda Neustadt a/k/a Brucha Neustadt a/k/a Brucha Landau, of the crime of **OFFERING A FALSE INSTRUMENT IN THE FIRST DEGREE**, in violation of Penal Law § 175.35(1), committed as follows:

The defendants, in the County of New York, during the period from on or about July 16, 2021, to on or about July 20, 2021, knowing that a written instrument, to wit, a New York State Homes and Community Renewal (“HCR”) M/WBE payment affirmation, contained a false statement and false information, and with intent to defraud the state and any political subdivision, public authority, and public benefit corporation, 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.

THIRTIETH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Tri-State Lumber, Ltd., Leah Guttman, Israel Wiesenfeld, and Brenda Neustadt a/k/a Brucha Neustadt a/k/a Brucha Landau, of the crime of **ATTEMPTED GRAND LARCENY IN THE SECOND DEGREE**, in violation of Penal Law § 110/155.40(1), committed as follows:

The defendants, in the County of New York and elsewhere, during the period from on or about September 14, 2021, to on or about November 8, 2021, attempted to steal property from LMV II 885 Washington Holdings, and the value of the property exceeded fifty thousand dollars.

THIRTY-FIRST COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Tri-State Lumber, Ltd., Leah Guttman, Israel Wiesenfeld, and Brenda Neustadt a/k/a Brucha Neustadt a/k/a Brucha Landau, of the crime **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, during the period from on or about September 14, 2021, to on or about November 8, 2021, with intent to defraud, and to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of Lien Servicing Company-1 (“LSC-1”), to wit, lien documentation.

THIRTY-SECOND COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Tri-State Lumber, Ltd., Leah Guttman, and Brenda Neustadt of the crime **FORGERY IN THE SECOND DEGREE**, in violation of Penal Law § 170.10, committed as follows:

The defendants, in the County of New York and elsewhere, during the period from on or about November 4, 2021, to on or about November 9, 2021, with intent to defraud, deceive and injury another, falsely made, completed, and altered a written instrument, the same being and purporting to be, and calculated to become and to represent if completed, an instrument which did and may have evidenced, created, transferred, terminated and otherwise affected a legal right, interest, obligation and status, to wit, a lien waiver.

ALVIN L. BRAGG, JR.  
District Attorney

Filed:

NA

No.

THE PEOPLE OF THE STATE OF NEW YORK

-against-

TRI-STATE LUMBER, LTD.,  
TS SUPPLIES, INC.,  
LEAH GUTTMAN,  
ISRAEL WIESENFELD,  
BRENDA NEUSTADT, A/K/A BRUCHA  
NEUSTADT, A/K/A BRUCHA LANDAU,  
Defendants.

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INDICTMENT

CONSPIRACY IN THE FIFTH DEGREE, P.L. §105.05 (all defendants)  
SCHEME TO DEFRAUD IN THE FIRST DEGREE, P.L. §190.65(1)(b) (Tri-State Lumber, Ltd.; Leah Guttman; Israel Wiesenfeld; and Brenda Neustadt)  
FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, P.L. §175.10 (Tri-State Lumber, Ltd.; Leah Guttman; Israel Wiesenfeld; and Brenda Neustadt) (14 counts)  
OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, P.L. §175.35(1) (Tri-State Lumber, Ltd.; Leah Guttman; Israel Wiesenfeld; and Brenda Neustadt) (14 counts)  
ATTEMPTED GRAND LARCENY IN THE SECOND DEGREE, P.L. §110/155.40(1) (Tri-State Lumber, Ltd.; Leah Guttman; Israel Wiesenfeld; and Brenda Neustadt);  
FORGERY IN THE SECOND DEGREE, P.L. §170.10 (Tri-State Lumber, Ltd.; Leah Guttman; and Brenda Neustadt)

ALVIN L. BRAGG, JR., District Attorney

A True Bill

James J. Hanley  
Zachary Weintraub  
Rackets Bureau

Foreman