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

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THE PEOPLE OF THE STATE OF NEW YORK,

-against-

INDICTMENT

ERIC ULRICH, and PAUL GREGO AKA DOMINICK GREGO AKA DOMENICK RUSSO

Defendants.

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THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment accuses the defendants Eric Ulrich and Paul Grego aka Dominick Grego aka Dominick Russo of the crime of CONSPIRACY IN THE FOURTH DEGREE, in violation of Penal Law § 105.10(1), committed as follows:

The defendants Eric Ulrich and Paul Grego, in New York County and elsewhere, from on or about November 30, 2021, to on or about November 1, 2022, with intent that conduct constituting the crimes of Bribery in the Second Degree, in violation of Penal Law § 200.03 and Bribe Receiving in the Second Degree, in violation of Penal Law § 200.11, said crimes being Class C felonies, be committed, knowingly and intentionally agreed with others, known and unknown, to engage in and cause the performance of such conduct that constitutes the above-mentioned class C felonies.

PREAMBLE

It was the purpose of this conspiracy for Eric Ulrich, a former New York City Councilman for District 32 (February 2009 to December 2021), former Senior Advisor to Mayor Eric Adams (January 2022 to April 2022), and former NYC Department of Buildings Commissioner ("DOB") (May 2022 to November 2022), to use his authority and influence in those positions for the benefit of Paul Grego, a DOB filing representative, and others, known and unknown, in exchange for money and gifts, including a bespoke suit and artwork.

It was also part of this conspiracy, while he was a Councilman, for Eric Ulrich to assist with the issuance of a letter of no objection ("LNO") for Café Rum, located at 1050 Wycoff Avenue in Queens, at the request of Paul Grego.

It was also part of this conspiracy, while he was DOB Commissioner, for Eric Ulrich to provide preferential treatment for clients represented by Paul Grego by connecting Paul Grego to other high-ranking DOB employees to expedite his clients' applications.

It was also part of this conspiracy, while he was DOB Commissioner, for Eric Ulrich to hire and reassign, and to attempt to hire and reassign DOB personnel based on requests from Paul Grego.

It was also part of this conspiracy for Eric Ulrich and Paul Grego to communicate with each other and others using codes and cryptic language, and an encrypted messaging application over telephones and cellphones.

Overt Acts

In furtherance of said conspiracy, and to achieve the object crimes thereof, the following overt acts, among others, were committed:

1. On November 30, 2021, in a telephone conversation, Eric Ulrich told a DOB employee working in the Community Affairs Unit that he was "trying to help a

constituent of [his], Mr. Grego," obtain a Letter of Verification ("LOV") on behalf of a business, Café Rum.

- 2. On November 30, 2021, in a telephone conversation, Eric Ulrich told the then DOB Commissioner that he was "trying to help a constituent of [his] who owns a café... what they need from [DOB] is a letter of verification to satisfy the SLA [State Liquor Authority] requirement."
- 3. On November 30, 2021, in a telephone conversation, Eric Ulrich told Paul Grego that the DOB Commissioner would assist with obtaining the LOV for Café Rum. Eric Ulrich and Paul Grego agreed to meet later that evening at Lenny's Clam Bar located at 161-03 Cross Bay Blvd., Howard Beach, New York.
- On November 30, 2021, Eric Ulrich deposited \$1000 in cash at a JPMorgan Chase bank branch located 156-33 Cross Bay Blvd., Howard Beach, Queens.
- 5. On December 1, 2021, Eric Ulrich sent the DOB Commissioner a photograph of Café Rum's previous LOV application that had been denied, with the message "this is that issue I was referring to yesterday."
- On December 1, 2021, Eric Ulrich sent Paul Grego a screenshot of his text to the DOB Commissioner.
- On December 3, 2021, after speaking with the DOB Commissioner, Eric Ulrich directed Paul Grego to file an application on behalf of Café Rum for an LNO, which was approved.
- 8. On December 27, 2021, Paul Grego sent Eric Ulrich a text asking him when he wanted to get fitted.

- 9. On January 6, 2022, in a telephone conversation, Paul Grego asked Eric Ulrich, in sum and substance, when he was picking up his suit.
- 10. On January 6, 2022, in a telephone conversation, Eric Ulrich told Paul Grego that Eric Ulrich's girlfriend was interested in a painting from Francisco Poblet, the last surviving apprentice of artist Salvador Dali.
- 11. On February 1, 2022, Eric Ulrich sent Paul Grego a text message with a photograph of a Poblet painting entitled *Don Quixote De La Mancha*.
- 12. On April 20, 2022, Eric Ulrich called Paul Grego from New York County and asked him to meet at Lenny's Clam Bar in Howard Beach, Queens, to "bring [him] up to speed on something," referring to Eric Ulrich's anticipated appointment as DOB Commissioner.
- 13. On May 3, 2022, the day that Eric Ulrich's appointment as DOB Commissioner was announced, Eric Ulrich met with Paul Grego in the vicinity of City Hall in New York County.
- 14. On June 1, 2022, Paul Grego called Eric Ulrich and stated, "I was just calling [a person known to the grand jury] up because I was trying to help with . . . two violations on his property," referring to a property located at 164-41 97th Street, Queens, New York. Paul Grego then told Eric Ulrich that he would meet him at DOB's headquarters in New York County.
- 15. On June 1, 2022, Paul Grego asked Eric Ulrich if he was on his "regular phone" and informed Eric Ulrich, "I got the things for you, the painting that your daughter did," a coded reference to the Poblet *Don Quixote De La Mancha* painting.

- 16. On June 1, 2022, Paul Grego told Eric Ulrich, "I got the thing, that Poblet left for you," a reference to *Don Quixote De La Mancha* painting.
- 17. On June 3, 2022, Eric Ulrich arranged to meet Paul Grego at his home so Paul Grego could "bring down the thing down with your daughter's thing."
- 18. On June 4, 2022, Paul Grego told Eric Ulrich, in sum and substance, that he hoped the suit fit him.
- 19. On June 4, 2022, Paul Grego asked Eric Ulrich, "Is there room on your wall for that painting," and "you saw the back of it, right?"
- 20. On July 16, 2022, Paul Grego called Eric Ulrich for assistance in obtaining a Temporary Certificate of Occupancy ["TCO"] for 164-41 97th St.
- 21. On July 19, 2022, Eric Ulrich called a DOB employee known to the grand jury and directed him to assist Paul Grego with the TCO application for 164-41 97th St.
- 22. On July 20, 2022, Paul Grego and Eric Ulrich met at Tre Sorelle restaurant located at 61 Reade Street in New York County, close to DOB's headquarters.
- 23. On July 22, 2022, Paul Grego called a person known to the grand jury ("John Doe #1") to see if he was interested in a position with DOB as an elevator inspector.
- 24. On July 22, 2022, Paul Grego called Eric Ulrich to inform him that he had some names regarding the "up and down division." They agreed to meet that afternoon at DOB headquarters in New York County.
- 25. On July 22, 2022, Eric Ulrich told a DOB human resources employee, in sum and substance, that he wanted to hire John Doe #1 as an elevator inspector and directed her to flag his application.

- 26. On July 27, 2022, Eric Ulrich called a senior DOB employee and asked about getting a Temporary Place of Assembly ("TPA") for Puglia, a restaurant located at 189 Hester Street in New York County.
- 27. On August 1, 2022, Paul Grego called Eric Ulrich from New York County and also connected another person known to the grand jury ("John Doe #2"), an architect representing Puglia. Grego and John Doe #2 informed Eric Ulrich that the TPA application had been rejected.
- 28. On August 1, 2022, Paul Grego and Eric Ulrich agreed to meet at Tre Sorelle restaurant in New York County.
- 29. On August 24, 2022, in a phone conversation, Paul Grego told Eric Ulrich, "I'm coming down the elevator now."
- 30. On August 24, 2022, Eric Ulrich called a high ranking DOB employee for an update on Puglia's TPA application.
- 31. On August 24, 2022, Eric Ulrich called a DOB employee and directed him to transfer a DOB inspector back to Queens.
- 32. On August 24, 2022, Paul Grego sent a text message with a photo of the DOB inspector's identification to John Doe #2.
- 33. On August 25, 2022, in a phone conversation from New York County, Paul Grego told John Doe #2, "He's going to be transferred by tomorrow or next week . . . At least we know ahead of time, and he knows . . . Thank you."

Count 2

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant Paul Grego of the crime of BRIBERY IN THE SECOND DEGREE, in violation of Penal Law § 200.03, committed as follows:

The defendant Paul Grego, in the County of New York and elsewhere, during the period from on or about April 20, 2022, to on or about November 1, 2022, conferred, and offered and agreed to confer, a benefit in excess of \$5000 upon a public servant upon an agreement and understanding that such public servant's vote, opinion, judgment, action, decision and exercise of discretion as a public servant would thereby be influenced.

Count 3

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant Eric Ulrich of the crime of BRIBE RECEIVING IN THE SECOND DEGREE, in violation of Penal Law § 200.11, committed as follows:

The defendant Eric Ulrich, in the County of New York and elsewhere, during the period from on or about April 20, 2022, to on or about November 1, 2022, being a public servant, solicited, accepted and agreed to accept a benefit in excess of \$5000 from another person upon an agreement and understanding that such public servant's vote, opinion, judgment, action, decision and exercise of discretion as a public servant would thereby be influenced.

Count 4

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant Paul Grego of the crime of BRIBERY IN THE THIRD DEGREE, in violation of Penal Law § 200.00, committed as follows:

The defendant Paul Grego, in the County of New York and elsewhere, during the period from on or about November 30, 2021, to on or about December 3, 2021, conferred, and offered and agreed to confer, a benefit upon a public servant upon an agreement and understanding that such public servant's vote, opinion, judgment, action, decision and exercise of discretion as a public servant would thereby be influenced.

Count 5

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant Eric Ulrich of the crime of BRIBE RECEIVING IN THE THIRD DEGREE, in violation of Penal Law § 200.10, committed as follows:

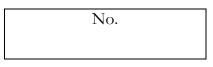
The defendant Eric Ulrich, in the County of New York and elsewhere, during the period from on or about November 30, 2021, to on or about December 3, 2021, being a public servant, solicited, accepted and agreed to accept a benefit from another person upon an agreement and understanding that such public servant's vote, opinion, judgment, action, decision and exercise of discretion as a public servant would thereby be influenced.

> ALVIN L. BRAGG, JR. District Attorney

GJ #8, 1st term – 2D

Filed:

NA



THE PEOPLE OF THE STATE OF NEW YORK

-against-

Eric Ulrich, Paul Grego

Defendants.

INDICTMENT

CONSPIRACY IN THE FOURTH DEGREE, P.L. § 105.10(1) BRIBERY IN THE SECOND DEGREE, P.L. § 200.03 – DEF Grego – 1 count BRIBE RECEIVING IN THE SECOND DEGREE, P.L. § 200.11 – DEF Ulrich – 1 count BRIBERY IN THE THIRD DEGREE, P.L. § 200.00 – DEF Grego – 1 count BRIBE RECEIVING IN THE THIRD DEGREE, P.L. § 200.10 – DEF Ulrich – 1 count

ALVIN L. BRAGG, JR., District Attorney

A True Bill

Guy R. Tardanico Denise D. Vasel Assistant District Attorneys Rackets Bureau

Foreman

ADJOURNED TO PART _____ ON _____