

I N D I C T M E N T  
W E S T C H E S T E R C O U N T Y C O U R T  
S T A T E O F N E W Y O R K

-----X  
THE PEOPLE OF THE STATE OF NEW YORK

against-

FILED:  
INDICTMENT NO: 18-0522

RICHARD THOMAS,

Defendant.

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Grand Larceny in the Third     PL § 155.35(1)  
Degree (3 counts)

Grand Larceny in the Fourth     PL § 155.30(1)  
Degree

Offering a False Instrument  
for Filing in the First     PL § 175.35(1)  
Degree (2 counts)

Offering a False Instrument     PL § 175.30  
for Filing in the Second  
Degree (2 counts)

BARBARA UNDERWOOD  
ACTING ATTORNEY GENERAL  
STATE OF NEW YORK

THE GRAND JURY OF THE COUNTY OF WESTCHESTER, by this indictment, accuses the defendant RICHARD THOMAS of the crime of **GRAND LARCENY IN THE THIRD DEGREE**, in violation of Penal Law § 155.35, committed as follows:

The defendant, in the County of Westchester, on or about October 2, 2015 through on or about January 31, 2016, stole property from the Friends of Richard Thomas Campaign Committee and the value of the property exceeded three thousand dollars.

SECOND COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant RICHARD THOMAS of the crime of **GRAND LARCENY IN THE THIRD DEGREE**, in violation of Penal Law § 155.35, committed as follows:

The defendant, in the County of Westchester, on or about October 2, 2015, stole property from the Friends of Richard Thomas Campaign Committee and the value of the property exceeded three thousand dollars.

THIRD COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant RICHARD THOMAS of the crime of **GRAND LARCENY IN THE THIRD DEGREE**, in violation of Penal Law § 155.35, committed as follows:

The defendant, in the County of Westchester, on or about October 31, 2015, stole property from the Friends of Richard Thomas Campaign Committee and the value of the property exceeded three thousand dollars.

FOURTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant RICHARD THOMAS of the crime of **GRAND LARCENY IN THE FOURTH DEGREE**, in violation of Penal Law § 155.30, committed as follows:

The defendant, in the County of Westchester, on or about November 25, 2015, stole property from the Friends of Richard Thomas Campaign Committee and the value of the property exceeded one thousand dollars.

FIFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant RICHARD THOMAS of the crime of **OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE**, in violation of Penal Law § 175.35(1), committed as follows:

The defendant in the County of Westchester, on or about November 27, 2015, knowing that a written instrument, namely a 27 Day Post-General Disclosure Report, 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, namely the New York State Board of Elections, with the knowledge and belief that it would be filed with, registered and recorded in and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation.

SIXTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant RICHARD THOMAS of the crime of **OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE**, in violation of Penal Law § 175.35(1), committed as follows:

The defendant in the County of Westchester, on or about February 1, 2016, knowing that a written instrument, namely a 2016 January Periodic Disclosure Report, 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, namely the New York State Board of Elections, with the knowledge and belief that it would be filed with, registered and recorded in and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation.

SEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant RICHARD THOMAS of the crime of **OFFERING A FALSE INSTRUMENT FOR FILING IN THE SECOND DEGREE**, in violation of Penal Law § 175.30, committed as follows:

The defendant in the County of Westchester, on or about May 31, 2016, knowing that a written instrument, namely a 2016 Annual Statement of Financial Disclosure Form, contained a false statement and false information, offered and presented it to a public office or public servant, namely the Mount Vernon City Clerk, with the knowledge and belief that it would be filed with, registered and recorded in and otherwise become a part of the records of such public office and public servant.

EIGHTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant RICHARD THOMAS of the crime of **OFFERING A FALSE INSTRUMENT FOR FILING IN THE SECOND DEGREE**, in violation of Penal Law § 175.30, committed as follows:

The defendant in the County of Westchester, on or about May 31, 2017, knowing that a written instrument, namely a 2017 Annual Statement of Financial Disclosure Form, contained a false statement and false information, offered and presented it to a public office or public servant, namely the Mount Vernon City Clerk, with the knowledge and belief that it would be filed with, registered and recorded in and otherwise become a part of the records of such public office and public servant.

BARBARA UNDERWOOD  
ACTING ATTORNEY GENERAL  
STATE OF NEW YORK

INDICTMENT NO. 18-0522

COUNTY COURT OF THE STATE OF NEW YORK  
COUNTY OF WESTCHESTER

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THE PEOPLE OF THE STATE OF NEW YORK

v.

**RICHARD THOMAS,**

Defendant.

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BARBARA UNDERWOOD  
Acting Attorney General  
State of New York

**A TRUE BILL**

The below signature directs the Acting Attorney General  
to file this Instrument with the Impanelling Court:

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Foreperson of Grand Jury

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Acting Foreperson of Grand Jury

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Charge(s) :

Grand Larceny in the Third Degree (3 counts)

Grand Larceny in the Fourth Degree

Offering a False Instrument for Filing in the First Degree (2  
counts)

Offering a False Instrument for Filing in the Second Degree (2  
counts)