THE PEOPLE OF THE STATE OF NEW YORK

-VS-

LOVELY A. WARREN,

ALBERT JONES, Jr.,

ROSILAND BROOKS HARRIS

## **FIRST COUNT:**

THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, accuses the defendant, LOVELY A. WARREN, ALBERT JONES, Jr., and ROSILAND BROOKS HARRIS of the crime of Scheme to Defraud in the First Degree, in violation of Sections 20.00 and 190.65, Subdivision (1)(b) of the Penal Law of the State of New York, committed as follows:

The defendants, on or about and between November 6, 2013, and November 7, 2017, in the County of Monroe, State of New York, while acting alone or in concert with another, engaged in a scheme constituting a systematic ongoing course of conduct with intent to defraud more than one person or to obtain property from more than one person by false or fraudulent pretenses, representations or promises, and so obtained property with a value in excess of one thousand dollars from one or more such persons.

## SECOND COUNT:

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendants, LOVELY A. WARREN, ALBERT JONES, Jr., and ROSILAND BROOKS HARRIS, of violating Section 14-126, Subdivision (6) of the Election Law of the State of New York and Section 20.00 of the Penal law of the State on New York, committed as follows:

The defendants, on or about and between November 6, 2013, and November 7, 2017, in the County of Monroe, State of New York, while acting alone or in concert with another, while acting on behalf of a candidate or political committee, knowingly and willfully solicited, organized or coordinated the formation of activities of one or more unauthorized committees, made expenditures in connection with the nomination for election or election of any candidate, or solicited any person to make any such expenditures, for the purpose of evading the contribution limitations of Article 14 of the Election Law of the State of New York.

SANDRA DOORLEY
DISTRICT ATTORNEY OF MONROE COUNTY