

SUPREME COURT OF THE STATE OF NEW YORK  
QUEENS COUNTY

THE PEOPLE OF THE STATE OF NEW YORK

-against-

RUBEN W. WILLS and JELANI R. MILLS,

Defendants.

**Filed:**

**INDICTMENT No. 605/2014**

P.L. § 190.65(1)(b)	SCHEME TO DEFRAUD IN THE FIRST DEGREE (1)	WILLS
P.L. § 155.35(1)	GRAND LARCENY IN THE THIRD DEGREE (2)	WILLS/MILLS
P.L. § 175.35	OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE (3)	WILLS
P.L. § 175.10	FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE (4)	WILLS
P.L. § 175.35	OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE (5)	WILLS
P.L. § 175.10	FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE (6)	WILLS/MILLS
P.L. § 175.10	FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE (7)	WILLS/MILLS
P.L. § 175.10	FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE (8)	WILLS/MILLS
P.L. § 155.35(1)	GRAND LARCENY IN THE THIRD DEGREE (9)	WILLS
P.L. § 175.10	FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE (10)	WILLS



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**COUNT ONE**

THE GRAND JURY, by this indictment, accuses the defendant RUBEN W. WILLS of the crime of SCHEME TO DEFRAUD IN THE FIRST DEGREE, in violation of Penal Law § 190.65(1)(b), committed as follows:

Defendant RUBEN W. WILLS, in or around May 2008 to in or around January 2012, in the County of Queens and elsewhere, 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 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.

**COUNT TWO**

THE GRAND JURY, by this indictment, accuses the defendants RUBEN W. WILLS and JELANI R. MILLS of the crime of GRAND LARCENY IN THE THIRD DEGREE, in violation of Penal Law § 155.35(1), committed as follows:

Defendants RUBEN W. WILLS and JELANI R. MILLS, acting in concert, in or around June 2009 to in or around April 2010, in the County of Queens and elsewhere, stole

property from the New York City Campaign Finance Board, and the value of the property exceeded three thousand dollars.

**COUNT THREE**

AND THE GRAND JURY, by this indictment, further accuses the defendant RUBEN W. WILLS of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

Defendant RUBEN W. WILLS, in or around February 2010 to in or around March 2010, in the County of Queens and elsewhere, knowing that a written instrument, specifically, an undated invoice from Micro Targeting, filed with the New York City Campaign Finance Board, 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.

**COUNT FOUR**

AND THE GRAND JURY, by this indictment, further accuses the defendant RUBEN W. WILLS of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

Defendant RUBEN W. WILLS, in or around February 2010 to in or around March 2010, in the County of Queens and elsewhere, with intent to defraud, including an intent to commit another crime and to aid and conceal the commission thereof, made and caused a false

entry in the business records of the Ruben Wills for New York committee, specifically, an undated invoice from Micro Targeting.

**COUNT FIVE**

AND THE GRAND JURY, by this indictment, further accuses the defendant RUBEN W. WILLS of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of Penal Law § 175.35, committed as follows:

Defendant RUBEN W. WILLS, in or around February 2010 to in or around March 2010, in the County of Queens and elsewhere, knowing that a written instrument, specifically, check number 1176 from Ruben Wills for New York dated November 2, 2009, to Micro Targeting, in the amount of \$11,500, filed with the New York City Campaign Finance Board, 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.

**COUNT SIX**

AND THE GRAND JURY, by this Indictment, further accuses the defendants RUBEN W. WILLS and JELANI R. MILLS of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

Defendants RUBEN W. WILLS and JELANI R. MILLS, acting in concert, in or around November 2009 to in or around March 2010, in the County of Queens and elsewhere,

with intent to defraud, including an intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of the Ruben Wills for New York committee, specifically, check number 1176 from Ruben Wills for New York dated November 2, 2009, to Micro Targeting, in the amount of \$11,500.

**COUNT SEVEN**

AND THE GRAND JURY, by this indictment, further accuses the defendants RUBEN W. WILLS and JELANI R. MILLS of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

Defendant RUBEN W. WILLS and JELANI R. MILLS, acting in concert, in or around November 2009, in the County of Queens and elsewhere, with intent to defraud, including an intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of JP Morgan Chase Bank, specifically, a Certificate of Conducting Business Under an Assumed Name for Individual dated November 2, 2009.

**COUNT EIGHT**

AND THE GRAND JURY, by this indictment, further accuses the defendants RUBEN W. WILLS and JELANI R. MILLS of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

Defendant RUBEN W. WILLS and JELANI R. MILLS, acting in concert, in or around November 2009, in the County of Queens and elsewhere, with intent to defraud, including an intent to commit another crime and to aid and conceal the commission thereof,

made and caused a false entry in the business records of JP Morgan Chase Bank, specifically, a Business Signature Card dated November 4, 2009.

**COUNT NINE**

AND THE GRAND JURY, by this indictment, accuses the defendant RUBEN W. WILLS of the crime of GRAND LARCENY IN THE THIRD DEGREE, in violation of Penal Law § 155.35(1), committed as follows:

Defendant RUBEN W. WILLS, in or around May 2008 to in or around January 2012, in the County of Queens and elsewhere, stole property from the New York State Office of Children and Family Services, and the value of the property exceeded three thousand dollars.

**COUNT TEN**

AND THE GRAND JURY, by this indictment, further accuses the defendant RUBEN W. WILLS of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

Defendant RUBEN W. WILLS, in or around July 2010, in the County of Queens and elsewhere, with intent to defraud, including an intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of NY 4 Life, specifically, check number 1004 from NY 4 Life dated July 12, 2010, in the amount of \$294.00.

**COUNT ELEVEN**

AND THE GRAND JURY, by this indictment, further accuses the defendant RUBEN W. WILLS of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

Defendant RUBEN W. WILLS, in or around September 2010 to in or around October 2010, in the County of Queens and elsewhere, with intent to defraud, including an intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of NY 4 Life, specifically, check number 7205000007 from NY 4 Life dated October 1, 2010, in the amount of \$1,200.

**COUNT TWELVE**

AND THE GRAND JURY, by this indictment, further accuses the defendant RUBEN W. WILLS of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law § 175.10, committed as follows:

Defendant RUBEN W. WILLS, in or around October 2010, in the County of Queens and elsewhere, with intent to defraud, including an intent to commit another crime and to aid and conceal the commission thereof, made and caused a false entry in the business records of NY 4 Life, specifically, check number 7469700002 from NY 4 Life dated October 3, 2010, in the amount of \$155.

ERIC T. SCHNEIDERMAN  
NEW YORK STATE  
ATTORNEY GENERAL