

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF RICHMOND: CRIMINAL TERM

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

INDICTMENT

Indictment No.:

Filed:  
File No.: 22-1265  
23-0381

*-against-*

ETTORE MAZZEI, a/k/a "MAZ,"  
[REDACTED] and  
RUDY SANTANA,

*Office Origin Sealed  
as to All Counts*

*Defendants.*

-----X  
COUNT ONE

THE GRAND JURY OF THE COUNTY OF RICHMOND, by this Indictment, accuses the defendants, ETTORE MAZZEI, a/k/a "MAZ" (hereinafter "MAZ"), and [REDACTED] of the crime of:

**CONSPIRACY IN THE FIFTH DEGREE (P.L. § 105.05-1)**, committed as follows:

The said defendants, in the Borough of Staten Island, County of Richmond, City and State of New York, and elsewhere, from on or about September 23, 2023, to on or about December 12, 2023, with intent that conduct constituting the crime of **GRAND LARCENY IN THE FOURTH DEGREE**, said crime being felony, be performed, did knowingly and intentionally agree with each other, and with others, known and unknown, to engage in and cause the performance of such conduct as would constitute the above-mentioned felony.

## PREAMBLE

It was part of the conspiracy for MAZ and [REDACTED] to identify transactions made by MAZ using a credit card in Staten Island, New York, and elsewhere, and to report said transactions as fraudulent to the credit card company.

It was also part of the conspiracy for MAZ to provide [REDACTED] with his credit card information to identify transactions to report as fraudulent in order to steal money from JPMorgan Chase & Co. in Staten Island.

It was also part of the conspiracy for MAZ to call the credit card company and report transactions as fraudulent using a phone.

It was also part of the conspiracy for [REDACTED] and MAZ to frequently communicate with each other to plan and arrange the reporting of legitimate transactions as fraudulent.

It was also part of the conspiracy for the members of the conspiracy to communicate with others over cellular telephones.

## OVERT ACTS

In furtherance of said conspiracy, and to achieve the objects thereof, from on or about September 23, 2023 to on or about December 12, 2023, the following overt acts, among others, were committed:

1. On or about November 20, 2023, MAZ made a purchase at Ruddy and Dean's in Staten Island, New York using a JPMorgan Chase & Co. credit card.
2. On or about November 26, 2023, MAZ made a purchase at Our Town Brewery in Lancaster, Pennsylvania using a JPMorgan Chase & Co. credit card.
3. On or about November 30, 2023, [REDACTED] sent a text message to MAZ.
4. On or about December 7, 2023, MAZ called [REDACTED].
5. On or about December 7, 2023, MAZ and [REDACTED] agreed to report transactions made by MAZ on a JPMorgan Chase & Co. credit card as fraudulent.
6. On or about December 11, 2023, [REDACTED] sent a text message to MAZ.
7. On or about December 11, 2023, [REDACTED] asked MAZ for his credit card account information.
8. On or about December 11, 2023, MAZ sent a text message to [REDACTED].
9. On or about December 12, 2023, MAZ called JPMorgan Chase & Co.

10. On or about December 12, 2023, MAZ called JPMorgan Chase & Co.

**COUNT TWO**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendants, Ettore Mazzei and [REDACTED], of the crime of:

**GRAND LARCENY IN THE FOURTH DEGREE (P.L. § 155.30-1)**, committed as follows:

The said defendants, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about and between September 23, 2023 and December 12, 2023, stole property of JPMorgan Chase & Co., consisting of United States Currency which had a value in excess of One Thousand Dollars (\$1,000).

**COUNT THREE**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendants, Ettore Mazzei and [REDACTED], of the crime of:

**FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE (P.L. § 175.10)**, committed as follows:

The said defendants, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about and between September 23, 2023 and December 12, 2023, with intent to defraud, and with intent to commit another crime or to aid or conceal the commission thereof, caused a false entry to be made in business records of an enterprise, namely, the credit card transaction history of JPMorgan Chase & Co.

**COUNT FOUR**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendants, Ettore Mazzei and [REDACTED] [REDACTED], of the crime of:

**FALSIFYING BUSINESS RECORDS IN THE SECOND DEGREE (P.L. § 175.05-1)**, committed as follows:

The said defendants, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about and between September 23, 2023 and December 12, 2023, with intent to defraud, caused a false entry to be made in business records of an enterprise, namely, the credit card transaction history of JPMorgan Chase & Co.

### COUNT FIVE

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Ettore Mazzei, of the crime of:

**GRAND LARCENY IN THE THIRD DEGREE (P.L. § 155.35-1)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about April 2, 2023, stole property of Kristen Maher, consisting of United States Currency which had a value in excess of Three Thousand Dollars (\$3,000).

### COUNT SIX

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Ettore Mazzei, of the crime of:

**GRAND LARCENY IN THE FOURTH DEGREE (P.L. § 155.30-1)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about April 2, 2023, stole property of Kristen Maher, consisting of United States Currency which had a value in excess of One Thousand Dollars (\$1,000).

### COUNT SEVEN

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Ettore Mazzei, of the crime of:

**IDENTITY THEFT IN THE FIRST DEGREE (P.L. § 190.80-1)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about April 2, 2023, knowingly and with the intent to defraud, used Kristen Maher's personal identifying information to obtain United States Currency in an aggregate amount that exceeded Two Thousand (\$2,000.00) Dollars.

### COUNT EIGHT

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Ettore Mazzei, of the crime of:

**UNLAWFUL POSSESSION OF PERSONAL IDENTIFICATION INFORMATION IN THE THIRD DEGREE (P.L. § 190.81)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about April 2, 2023, knowingly and with intent to use personal identification information in furtherance of the commission of a crime, possessed Kristen Maher's checking account number or code.

**COUNT NINE**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Ettore Mazzei, of the crime of:

**GRAND LARCENY IN THE FOURTH DEGREE (P.L. § 155.30-1)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about April 4, 2023, stole property of Kristen Maher, consisting of United States Currency which had a value in excess of One Thousand Dollars (\$1,000).

**COUNT TEN**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Ettore Mazzei, of the crime of:

**IDENTITY THEFT IN THE FIRST DEGREE (P.L. § 190.80-1)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about April 4, 2023, knowingly and with the intent to defraud, used Kristen Maher's personal identifying information to obtain United States Currency in an aggregate amount that exceeded Two Thousand (\$2,000.00) Dollars.

**COUNT ELEVEN**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Ettore Mazzei, of the crime of:

**UNLAWFUL POSSESSION OF PERSONAL IDENTIFICATION INFORMATION IN THE THIRD DEGREE (P.L. § 190.81)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about April 4, 2023, knowingly and with intent to use personal identification information in furtherance of the commission of a crime, possessed Kristen Maher's checking account number or code.

**COUNT TWELVE**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Ettore Mazzei, of the crime of:

**GRAND LARCENY IN THE FOURTH DEGREE (P.L. § 155.30-1)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about April 7, 2023, stole property of Kristen Maher, consisting of United States Currency which had a value in excess of One Thousand Dollars (\$1,000).

### **COUNT THIRTEEN**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Ettore Mazzei, of the crime of:

**IDENTITY THEFT IN THE SECOND DEGREE (P.L. § 190.79-1)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about April 7, 2023, knowingly and with the intent to defraud, used Kristen Maher's personal identifying information to obtain United States Currency in an aggregate amount that exceeded Five Hundred (\$500.00) Dollars.

### **COUNT FOURTEEN**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Ettore Mazzei, of the crime of:

**UNLAWFUL POSSESSION OF PERSONAL IDENTIFICATION INFORMATION IN THE THIRD DEGREE (P.L. § 190.81)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about April 7, 2023, knowingly and with intent to use personal identification information in furtherance of the commission of a crime, possessed Kristen Maher's checking account number or code.

### **COUNT FIFTEEN**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Ettore Mazzei, of the crime of:

**GRAND LARCENY IN THE THIRD DEGREE (P.L. § 155.35-1)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about April 15, 2023, stole property of Kristen Maher, consisting of United States Currency which had a value in excess of Three Thousand Dollars (\$3,000).

### **COUNT SIXTEEN**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Ettore Mazzei, of the crime of:

**GRAND LARCENY IN THE FOURTH DEGREE (P.L. § 155.30-1)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about April 15, 2023, stole property of Kristen Maher, consisting of United States Currency which had a value in excess of One Thousand Dollars (\$1,000).

**COUNT SEVENTEEN**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Ettore Mazzei, of the crime of:

**IDENTITY THEFT IN THE FIRST DEGREE (P.L. § 190.80-1)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about April 15, 2023, knowingly and with the intent to defraud, used Kristen Maher's personal identifying information to obtain United States Currency in an aggregate amount that exceeded Two Thousand (\$2,000.00) Dollars.

**COUNT EIGHTEEN**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Ettore Mazzei, of the crime of:

**UNLAWFUL POSSESSION OF PERSONAL IDENTIFICATION INFORMATION IN THE THIRD DEGREE (P.L. § 190.81)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about April 15, 2023, knowingly and with intent to use personal identification information in furtherance of the commission of a crime, possessed Kristen Maher's checking account number or code.

**COUNT NINETEEN**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Ettore Mazzei, of the crime of:

**GRAND LARCENY IN THE FOURTH DEGREE (P.L. § 155.30-1)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about April 20, 2023, stole property of Kristen Maher, consisting of United States Currency which had a value in excess of One Thousand Dollars (\$1,000).

**COUNT TWENTY**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Ettore Mazzei, of the crime of:

**IDENTITY THEFT IN THE SECOND DEGREE (P.L. § 190.79-1)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about April 20, 2023, knowingly and with the intent to defraud, used Kristen Maher's personal identifying information to obtain United States Currency in an aggregate amount that exceeded Five Hundred (\$500.00) Dollars.

**COUNT TWENTY-ONE**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Ettore Mazzei, of the crime of:

**UNLAWFUL POSSESSION OF PERSONAL IDENTIFICATION INFORMATION IN THE THIRD DEGREE (P.L. § 190.81)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about April 20, 2023, knowingly and with intent to use personal identification information in furtherance of the commission of a crime, possessed Kristen Maher's checking account number or code.

**COUNT TWENTY-TWO**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Ettore Mazzei, of the crime of:

**GRAND LARCENY IN THE FOURTH DEGREE (P.L. § 155.30-1)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about April 25, 2023, stole property of Kristen Maher, consisting of United States Currency which had a value in excess of One Thousand Dollars (\$1,000).

**COUNT TWENTY-THREE**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Ettore Mazzei, of the crime of:

**IDENTITY THEFT IN THE SECOND DEGREE (P.L. § 190.79-1)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about April 25, 2023, knowingly and with the intent to defraud, used Kristen Maher's personal identifying information to obtain United States Currency in an aggregate amount that exceeded Five Hundred (\$500.00) Dollars.

#### **COUNT TWENTY-FOUR**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Ettore Mazzei, of the crime of:

**UNLAWFUL POSSESSION OF PERSONAL IDENTIFICATION INFORMATION IN THE THIRD DEGREE (P.L. § 190.81)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about April 25, 2023, knowingly and with intent to use personal identification information in furtherance of the commission of a crime, possessed Kristen Maher's checking account number or code.

#### **COUNT TWENTY-FIVE**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Ettore Mazzei, of the crime of:

**GRAND LARCENY IN THE THIRD DEGREE (P.L. § 155.35-1)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about May 9, 2023, stole property of Kristen Maher, consisting of United States Currency which had a value in excess of Three Thousand Dollars (\$3,000).

#### **COUNT TWENTY-SIX**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Ettore Mazzei, of the crime of:

**GRAND LARCENY IN THE FOURTH DEGREE (P.L. § 155.30-1)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about May 9, 2023, stole property of Kristen Maher, consisting of United States Currency which had a value in excess of One Thousand Dollars (\$1,000).

#### **COUNT TWENTY-SEVEN**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Ettore Mazzei, of the crime of:

**IDENTITY THEFT IN THE FIRST DEGREE (P.L. § 190.80-1)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about May 9, 2023, knowingly and with the intent to defraud, used Kristen Maher's personal identifying information to obtain United States Currency in an aggregate amount that exceeded Two Thousand (\$2,000.00) Dollars.

### **COUNT TWENTY-EIGHT**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Ettore Mazzei, of the crime of:

**CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE (P.L. § 170.25)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about May 9, 2023, with knowledge that it was forged and with intent to defraud, deceive, and injure another, uttered and possessed a forged instrument, namely, a fraudulent check.

### **COUNT TWENTY-NINE**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Ettore Mazzei, of the crime of:

**UNLAWFUL POSSESSION OF PERSONAL IDENTIFICATION INFORMATION IN THE THIRD DEGREE (P.L. § 190.81)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about May 9, 2023, knowingly and with intent to use personal identification information in furtherance of the commission of a crime, possessed Kristen Maher's checking account number or code.

### **COUNT THIRTY**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Ettore Mazzei, of the crime of:

**GRAND LARCENY IN THE THIRD DEGREE (P.L. § 155.35-1)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about May 23, 2023, stole property of Kristen Maher, consisting of United States Currency which had a value in excess of Three Thousand Dollars (\$3,000).

### **COUNT THIRTY-ONE**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Ettore Mazzei, of the crime of:

**GRAND LARCENY IN THE FOURTH DEGREE (P.L. § 155.30-1)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about May 23, 2023, stole property of Kristen Maher, consisting of United States Currency which had a value in excess of One Thousand Dollars (\$1,000).

**COUNT THIRTY-TWO**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Ettore Mazzei, of the crime of:

**IDENTITY THEFT IN THE FIRST DEGREE (P.L. § 190.80-1)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about May 23, 2023, knowingly and with the intent to defraud, used Kristen Maher's personal identifying information to obtain United States Currency in an aggregate amount that exceeded Two Thousand (\$2,000.00) Dollars.

**COUNT THIRTY-THREE**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Ettore Mazzei, of the crime of:

**CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE (P.L. § 170.25)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about May 23, 2023, with knowledge that it was forged and with intent to defraud, deceive, and injure another, uttered and possessed a forged instrument, namely, a fraudulent check.

**COUNT THIRTY-FOUR**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Ettore Mazzei, of the crime of:

**UNLAWFUL POSSESSION OF PERSONAL IDENTIFICATION INFORMATION IN THE THIRD DEGREE (P.L. § 190.81)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about May 23, 2023, knowingly and with intent to use personal identification information in furtherance of the commission of a crime, possessed Kristen Maher's checking account number or code.

**COUNT THIRTY-FIVE**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Ettore Mazzei, of the crime of:

**GRAND LARCENY IN THE THIRD DEGREE (P.L. § 155.35-1)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about and between April 2, 2023 and May 23, 2023, stole property of Kristen Maher, consisting of United States Currency which had a value in excess of Three Thousand Dollars (\$3,000).

**COUNT THIRTY-SIX**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Rudy Santana, of the crime of:

**ATTEMPTED GRAND LARCENY IN THE SECOND DEGREE (P.L. § 110/155.35-1)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about April 15, 2023, attempted to steal the property of Kristen Maher, consisting of United States Currency which had a value in excess of Fifty Thousand Dollars (\$50,000).

**COUNT THIRTY-SEVEN**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Rudy Santana, of the crime of:

**FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE (P.L. § 175.10)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about April 15, 2023, with intent to defraud, and with intent to commit another crime or to aid or conceal the commission thereof, caused a false entry, namely, a facsimile letter, to be made in business records of an enterprise, namely, Prudential Financial, Inc.

**COUNT THIRTY-EIGHT**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Rudy Santana, of the crime of:

**FALSIFYING BUSINESS RECORDS IN THE SECOND DEGREE (P.L. § 175.05-1)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about April 15, 2023, with intent to defraud, caused a false entry, namely, a facsimile letter, to be made in business records of an enterprise, namely, Prudential Financial, Inc.

**COUNT THIRTY-NINE**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Rudy Santana, of the crime of:

**IDENTITY THEFT IN THE FIRST DEGREE (P.L. § 190.80-3)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about April 15, 2023, knowingly and with the intent to defraud used Kristen Maher's personal identifying information to attempt to commit a Class D or higher felony, namely Grand Larceny in the Second Degree.

**COUNT FORTY**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses defendant, Rudy Santana, of the crime of:

**UNLAWFUL POSSESSION OF PERSONAL IDENTIFICATION INFORMATION IN THE THIRD DEGREE (P.L. § 190.81)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about April 15, 2023, knowingly and with intent to use personal identification information in furtherance of the commission of a crime, possessed Kristen Maher's checking account number or code.

Dated: May 17, 2024  
Staten Island, NY



**MICHAEL E. McMAHON  
DISTRICT ATTORNEY  
RICHMOND COUNTY**

**A TRUE BILL**

  
Acting **FOREPERSON**

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF RICHMOND: CRIMINAL TERM

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THE PEOPLE OF THE STATE OF NEW YORK

*-against-*

ETTORE MAZZEI, a/k/a "MAZ,"

██████████ ████████████████████ ████████████ and  
RUDY SANTANA

*Defendants.*

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INDICTMENT

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*Office Origin Sealed  
as to All Counts*

MICHAEL E. McMAHON  
Richmond County District Attorney  
130 Stuyvesant Place  
Staten Island, New York 10301

Matthew Signorile  
Volha Salavei  
Assistant District Attorneys  
(718) 556-7107  
Of Counsel