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-

INGRID LEWIS-MARTIN,
GLENN D. MARTIN II AKA SUAVE AKA
SUAVE LUCIANO
RAIZADA VAID AKA PINKY, and
MAYANK DWIVEDI

Defendants.

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THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment accuses the defendants Ingrid Lewis-Martin, Glenn D. Martin II aka Suave aka Suave Luciano, Raizada Vaid aka Pinky, and Mayank Dwivedi, of the crime of CONSPIRACY IN THE FOURTH DEGREE, in violation of Penal Law § 105.10(1), committed as follows:

The defendants, Ingrid Lewis-Martin, Glenn D. Martin II aka Suave aka Suave Luciano, Raizada Vaid aka Pinky, and Mayank Dwivedi, in New York County and elsewhere, from on or about January 27, 2022, to on or about June 30, 2024, with intent that conduct constituting the crimes of Bribery in the First Degree, in violation of Penal Law § 200.04(2), and Bribe Receiving in the First Degree, in violation of Penal Law § 200.12(b), said crimes being Class B 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 B felonies.

## **PREAMBLE**

It was the purpose of this conspiracy for Ingrid Lewis-Martin, the Chief Advisor to Mayor Eric Adams, to use her authority and influence in that position for the benefit of Raizada Vaid aka Pinky, Mayank Dwivedi, and/or entities owned and/or controlled by them and/or others, known and unknown, in exchange for United States currency and other benefits, including benefits to her son, defendant Glenn D. Martin II aka Suave aka Suave Luciano.

It was also part of this conspiracy for Glenn D. Martin II aka Suave aka Suave Luciano to act as an intermediary between Ingrid Lewis-Martin and defendants Raizada Vaid aka Pinky and Mayank Dwivedi to communicate with, schedule and arrange meetings with, and receive payment and other benefits from Raizada Vaid aka Pinky and Mayank Dwivedi, and/or entities owned and/or controlled by them and and/or others, known and unknown, to insulate Ingrid Lewis-Martin from the ongoing bribery scheme.

It was also part of this conspiracy for Ingrid Lewis-Martin to intervene with the New York City Department of Buildings ("DOB") to obtain assistance for Raizada Vaid aka Pinky, Mayank Dwivedi, and/or entities owned and/or controlled by them for a construction project at 1204 Broadway, New York, NY.

It was also part of this conspiracy for Ingrid Lewis-Martin to intervene with the DOB to obtain assistance for Raizada Vaid aka Pinky, Mayank Dwivedi, and/or entities owned and/or controlled by them for construction projects at 107 Rivington Street, New York, NY.

It was also part of this conspiracy for Ingrid Lewis-Martin to provide Raizada Vaid aka Pinky and Mayank Dwivedi access to high-ranking New York City government officials.

It was also part of this conspiracy for Raizada Vaid aka Pinky to solicit assistance from Ingrid Lewis-Martin with a visa issue for a family member.

It was also part of this conspiracy for Raizada Vaid aka Pinky to solicit assistance from Ingrid Lewis-Martin and Glenn D. Martin II aka Suave aka Suave Luciano related to a permit issued by the New York City Department of Transportation ("DOT").

It was also part of this conspiracy for Ingrid Lewis-Martin and Glenn D. Martin II aka Suave aka Suave Luciano to agree to accept financial support from Raizada Vaid aka Pinky and Mayank Dwivedi for other business ventures, including a clothing line and a Chick-fil-A franchise, in exchange for Ingrid Lewis-Martin's assistance in her official capacity.

It was also part of this conspiracy for Ingrid Lewis-Martin, Glenn D. Martin II aka Suave aka Suave Luciano, Raizada Vaid aka Pinky, and Mayank Dwivedi to communicate with each other and others using encrypted messaging applications over 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 January 27, 2022, Raizada Vaid aka Pinky, Mayank Dwivedi, Ingrid Lewis-Martin, and Glenn D. Martin II aka Suave aka Suave Luciano met.
- 2. On January 28, 2022, Ingrid Lewis-Martin sent a text message to Raizada Vaid aka Pinky and Mayank Dwivedi inviting them to Gracie Mansion where the Mayor would be meeting with foreign dignitaries.
- 3. On May 25, 2022, Glenn D. Martin II aka Suave aka Suave Luciano scheduled a meeting between Ingrid Lewis-Martin and Raizada Vaid aka Pinky for May 27, 2022.
- 4. On May 30, 2022, Raizada Vaid aka Pinky sent a series of WhatsApp messages to Ingrid Lewis-Martin asking for her help to expedite a visa for a family member, stating, "[T]his exactly needs to be pushed to get immediate appointment."
- 5. On May 30, 2022, Ingrid Lewis-Martin sent a WhatsApp message to Raizada Vaid aka Pinky asking him to send his visa request in "an official email" to her City Hall email address.
- 6. On May 31, 2022, Ingrid Lewis-Martin sent a WhatsApp message to Raizada Vaid aka Pinky confirming that she had contacted Senator Gillibrand's office about the visa issue.

- 7. On November 16, 2022, Mayank Dwivedi sent a text message to Raizada Vaid aka Pinky stating, "Other email from Gary: Permits rejected?" referring to a pending DOB construction application for a building located at 107 Rivington Street, New York, NY.
- 8. On November 16, 2022, Mayank Dwivedi sent a text message to Raizada Vaid aka Pinky stating, "Ingrid Madam is needed."
- 9. On November 16, 2022, Raizada Vaid aka Pinky sent a text message to Ingrid Lewis-Martin requesting a phone call.
- 10. On November 16, 2022, Ingrid Lewis-Martin called Raizada Vaid aka Pinky.
- 11. On November 26, 2022, Ingrid Lewis-Martin sent a text message to Raizada Vaid aka Pinky and her Deputy Chief of Staff to schedule a meeting between Ingrid Lewis-Martin and Raizada Vaid aka Pinky.
- 12. On November 30, 2022, Raizada Vaid aka Pinky sent a text message to Ingrid Lewis-Martin's Deputy Chief of Staff to confirm a meeting with Ingrid Lewis-Martin on December 8, 2022.
- 13. On November 30, 2022, Raizada Vaid aka Pinky sent a text message to Ingrid Lewis-Martin stating, "Hello Ingrid how are you? Can you pls call your source to approve application number #123165546 At Dob Still pending," referring to a DOB construction application for a building located at 1204 Broadway, New York, NY.

- 14. On December 8, 2022, Ingrid Lewis-Martin sent a text to Raizada Vaid aka Pinky stating that she was running late for the meeting.
- 15. On December 8, 2022, while meeting with Raizada Vaid aka Pinky, Ingrid Lewis-Martin sent a text message to Raizada Vaid aka Pinky inviting him to join Signal, a third-party encrypted messaging application.
- 16. On December 8, 2022, while meeting with Raizada Vaid aka Pinky, Ingrid Lewis-Martin sent a text message to the Acting DOB Commissioner stating, "Good morning [Acting DOB Commissioner]. Can we please expedite: approve application number # 123165546," referring to a DOB construction application for a building located at 1204 Broadway, New York, NY.
- 17. On December 8, 2022, Raizada Vaid aka Pinky sent a Signal message to Ingrid Lewis-Martin that he had installed Signal.
- 18. On December 8, 2022, Raizada Vaid aka Pinky used Signal to resend the message he had previously sent to Ingrid Lewis-Martin on November 30, 2022: "Hello Ingrid how are you? Can you pls call your source to approve application number #123165546 At Dob Still pending," referring to a DOB construction application for a building located at 1204 Broadway, New York, NY.
- 19. On December 8, 2022, Ingrid Lewis-Martin attempted to call the Acting DOB commissioner.

- 20. On December 8, 2022, Ingrid Lewis-Martin sent Raizada Vaid aka Pinky a Signal message stating, "Got it."
- 21.On December 8, 2022, Ingrid Lewis-Martin sent the Acting DOB Commissioner a copy of Raizada Vaid's aka Pinky's Signal message from earlier in the day: "Please look into Need to move this forward. # 123165546 At Dob Still pending Thanks," referring to a DOB construction application for a building located at 1204 Broadway, New York, NY.
- 22. On December 8, 2022, Ingrid Lewis-Martin sent a text message to Glenn D.

  Martin II aka Suave aka Suave Luciano stating, "Pinky has you completely covered. You[r] fashion line is 100 percent. Call him later."
- 23. On December 9, 2022, Raizada Vaid aka Pinky sent Ingrid Lewis-Martin a Signal message stating, "Hi Ingrid Please call your DOB contact for my Rivington job number M08004615 Please get this one processed too. It is stuck too at DOB Thanks Have a great weekend Regards Pinky," referring to a DOB construction application for a building located at 107 Rivington Street, New York, NY.
- 24. On December 11, 2022, Ingrid Lewis-Martin texted the Acting DOB Commissioner "Can you assist: job number M08004615 It is stuck too at DOB Thanks, mucho. If there is an issue let me know," referring to a DOB construction application for a building located at 107 Rivington Street, New York, NY.

- 25. On December 11, 2022, Ingrid Lewis-Martin set her Signal messages with Raizada Vaid aka Pinky to disappear after one hour.
- 26. On January 9, 2023, Glenn D. Martin II aka Suave aka Suave Luciano sent a text message to Raizada Vaid aka Pinky requesting to meet the following day.
- 27. On January 9, 2023, Raizada Vaid aka Pinky sent a text message to Glenn D. Martin II aka Suave aka Suave Luciano confirming that they would meet at Pinky Realty LLC, located at 22 West 32<sup>nd</sup> Street, 15<sup>th</sup> Floor, New York, NY.
- 28. On January 17, 2023, Raizada Vaid aka Pinky sent a text to Ingrid Lewis-Martin stating, "I need this favor. This is still stuck at DOB. The DOB plan reviewer is giving us zoning objections for a simple Alt2 interior renovation permit. We have stated there is no change of use, egress or occupancy. Application job number# M08004615 ... Please get this through. Regards Pinky," referring to a DOB construction application for a building located at 107 Rivington Street, New York, NY.
- 29. On January 17, 2023, Ingrid Lewis-Martin sent a text message to Raizada Vaid aka Pinky responding, "Please only use Signal for asks."
- 30. On January 17, 2023, Ingrid Lewis-Martin sent a text message to the Acting DOB Commissioner stating, "Please look into this with thanks and gratitude. See below ask: The DOB plan reviewer is giving us zoning objections for a simple Alt2 interior renovation permit. We have stated there is no change of use, egress or occupancy. Application job number# M08004615."

- 31. On May 23, 2023, Raizada Vaid aka Pinky sent a text message to Glenn D. Martin II aka Suave aka Suave Luciano stating, "Building address 28 W. 30th St. Building is M1 6 zoning I want to change into short-term rentals. Can it be done and if it is what I need to do?"
- 32. On June 1, 2023, Glenn D. Martin II aka Suave aka Suave Luciano forwarded the May 23, 2023, text message from Raizada Vaid aka Pinky to a City Planning Commission member and asked, "[C]an this be done?"
- 33. On June 21, 2023, Glenn D. Martin II aka Suave aka Suave Luciano called Raizada Vaid aka Pinky.
- 34. On June 21, 2023, Raizada Vaid aka Pinky sent a text message to Glenn D. Martin II aka Suave aka Suave Luciano with the address 876 6th Avenue, a building owned by Raizada Vaid aka Pinky, and attached a photograph of a DOT application, number 2023052400329340.
- 35. On June 21, 2023, Ingrid Lewis-Martin sent a text message to the Acting DOB Commissioner, which was intended for the DOT Commissioner: "Can you look into this application? The applicant said that it is stuck at DOT dept as many people are on holiday there. Application tracking number is 20230524003299340 [sic] Thank you."
- 36. On August 28, 2023, Glenn D. Martin II aka Suave aka Suave Luciano sent a text message to Raizada Vaid aka Pinky asking if they could meet that day.

- 37. On August 28, 2023, Glenn D. Martin II aka Suave aka Suave Luciano called Mayank Dwivedi.
- 38. On August 28, 2023, Mayank Dwivedi, through his company Landshark Consulting Services Inc., issued a \$50,000 cashier's check payable to "Glenn Martin II."
- 39. On August 28, 2023, Glenn D. Martin II aka Suave aka Suave Luciano deposited the \$50,000 cashier's check issued by Landshark Consulting Services, Inc. at a bank ATM in New York County.
- 40. On August 28, 2023, Glenn D. Martin II aka Suave aka Suave Luciano deposited \$2,950 in cash at a bank ATM in New York County.
- 41. On August 29, 2023, Raizada Vaid aka Pinky issued a \$50,000 check payable to "Glenn Martin II."
- 42. On August 29, 2023, Glenn D. Martin aka Suave aka Suave Luciano deposited the \$50,000 check issued by Raizada Vaid aka Pinky.
- 43. On September 8, 2023, Raizada Vaid aka Pinky forwarded a text to Glenn D. Martin II aka Suave aka Suave Luciano from a person known to the grand jury ("John Doe"), which requested assistance with securing a Garage Parking Structures Inspector (GPSI) license and a Qualified Exterior Wall Inspector (QEWI) license from the DOB.

- 44. On or about December 6, 2023, Raizada Vaid aka Pinky tried to arrange a meeting among Glenn Martin II aka Suave aka Suave Luciano, John Doe, and himself.
- 45. On March 21, 2024, Raizada Vaid aka Pinky sent a text to Glenn D. Martin II aka Suave aka Suave Luciano stating, "107 Rivington PAA filing number M08004615 Can you let your Mom know that Dob needs to approve this. My architect resubmitted today," referring to a DOB construction application for a building located at 107 Rivington Street, New York, NY.
- 46. On April 16, 2024, Glenn D. Martin II aka Suave aka Suave Luciano called Raizada Vaid aka Pinky to arrange a meeting for later that day.
- 47. On April 16, 2024, Glenn D. Martin II aka Suave aka Suave Luciano, Raizada Vaid aka Pinky, and Mayank Dwivedi met in the vicinity of 107 Rivington Street, New York, NY.
- 48. On May 16, 2024, in a telephone conversation, Glenn Martin II aka Suave aka Suave Luciano, in sum and substance, asked Raizada Vaid aka Pinky for assistance with establishing a Chick-fil-A franchise and stated in part, "I need your help on Chick-fil-A... You want me to start the process with the paperwork? Or you have a team to do that?"
- 49. On May 16, 2024, in a telephone conversation, Raizada Vaid aka Pinky stated to Glenn Martin II aka Suave aka Suave Luciano, "You can sit with my girl

- and my comptroller, and you can just tell her what is what and then we can make it happen."
- 50. On June 6, 2024, in a telephone conversation, Glenn Martin II aka Suave aka Suave Luciano stated to Raizada Vaid aka Pinky, "I need you to help me start the process because they're going to ask so many questions about previous business history and stuff," referring to the Chick-fil-A franchise.
- 51. On June 6, 2024, in a telephone conversation, Raizada Vaid aka Pinky responded to Glenn Martin II aka Suave aka Suave Luciano, stating in part, "No problem. I will be with you to take care of those. Come to me. We'll talk."
- 52. On June 7, 2024, in a telephone conversation, Glenn D. Martin II aka Suave aka Suave Luciano spoke with a real estate agent known to the grand jury ("Jane Doe") about possible locations for a Chick-fil-A franchise. Glenn Martin II aka Suave aka Suave Luciano stated to Jane Doe that he was going to meet with "the guy who's going to help back me."
- 53. On June 11, 2024, Glenn D. Martin II aka Suave aka Suave Luciano sent a text message to Raizada Vaid aka Pinky requesting a meeting that day.
- 54. On June 11, 2024, Raizada Vaid aka Pinky sent a text message to Glenn D.

  Martin II aka Suave aka Suave Luciano to confirm that the meeting location
  was 22 West 32<sup>nd</sup> Steet, 15<sup>th</sup> Floor, New York, NY.

- 55. On June 11, 2024, in a telephone conversation, Glenn D. Martin II aka Suave aka Suave Luciano told Ingrid Lewis-Martin, "I'm here with Pinky. He wanted to speak with you. He wanted to hear your voice."
- 56. On June 11, 2024, in a telephone conversation, Raizada Vaid aka Pinky stated to Ingrid Lewis-Martin, "I tried to go through your son, not to bother you."
- 57. On June 11, 2024, in a telephone conversation, Glenn D. Martin II aka Suave aka Suave Luciano told Ingrid Lewis-Martin, "Pinky and I, we're working on a nice project."
- 58. On June 11, 2024, in a telephone conversation, Ingrid Lewis-Martin stated to Glenn D. Martin II aka Suave aka Suave Luciano and Raizada Vaid aka Pinky, "He's [Raizada Vaid aka Pinky is] a good person to do a project with."
- 59. On June 11, 2024, in a telephone conversation, Glenn D. Martin II aka Suave aka Suave Luciano called Jane Doe to discuss locations for a Chick-fil-A franchise.
- 60. On June 12, 2024, in a telephone conversation, Raizada Vaid aka Pinky informed Glenn D. Martin II aka Suave aka Suave Luciano that he "started the application" and asked to meet.
- 61. On June 20, 2024, in a telephone conversation, Ingrid Lewis-Martin informed Jane Doe, "Glenn's partner already put in for the Chick-fil-A."
- 62. On June 20, 2024, in a telephone conversation, Jane Doe stated to Ingrid Lewis-Martin, "Yeah he [Glenn D. Martin II aka Suave aka Suave Luciano]

- told me last week. We spoke last week. He was putting the paper in. We're waiting for him to get back. As soon as it gets back to us, we're going to get him a space and then we'll move forward."
- 63. On June 20, 2024, in a telephone conversation, Ingrid Lewis-Martin responded to Jane Doe, "I'm not playing. Your sister has to be rich! I'm gonna retire."
- 64. On June 25, 2024, Glenn D. Martin II aka Suave aka Suave Luciano called Raizada Vaid aka Pinky for an update on the Chick-fil-A application, stating, "Maybe to expedite, maybe we could try to reach somebody and find out? I'll see what I can do on my side."
- 65. On June 30, 2024, in a telephone conversation, Raizada Vaid aka Pinky asked Glenn D. Martin II aka Suave aka Suave Luciano for a copy of his ID for the application.
- 66. On June 30, 2024, Glenn D. Martin II aka Suave aka Suave Luciano sent Raizada Vaid aka Pinky a text message with his social security number and a picture of his driver's license.

## Count 2

AND THE GRAND JURY AFORESAID, by this indictment, accuses the defendants Raizada Vaid aka Pinky and Mayank Dwivedi of the crime of BRIBERY IN THE FIRST DEGREE, in violation of Penal Law § 200.04(2), committed as follows:

The defendants, Raizada Vaid aka Pinky and Mayank Dwivedi, in the County of New York and elsewhere, during the period from on or about January 27, 2022, to on or about June 30, 2024, conferred, and offered and agreed to confer, a benefit in excess of \$100,000 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 defendants Ingrid Lewis-Martin and Glenn D. Martin II aka Suave aka Suave Luciano of the crime of BRIBE RECEIVING IN THE FIRST DEGREE, in violation of Penal Law § 200.12(b), committed as follows:

The defendants, Ingrid Lewis-Martin and Glenn D. Martin II aka Suave aka Suave Luciano, in the County of New York and elsewhere, during the period from on or about January 27, 2022, to on or about June 30, 2024, solicited, accepted and agreed to accept a benefit in excess of \$100,000 from another person upon an agreement and understanding that defendant Ingrid Lewis-Martin'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, accuses the

defendants Ingrid Lewis-Martin and Glenn D. Martin II aka Suave aka Suave Luciano

of MONEY LAUNDERING IN THE THIRD DEGREE, in violation of Penal Law

§ 470.10(1)(b)(ii)(A)(iii), committed as follows:

The defendants Ingrid Lewis-Martin and Glenn D. Martin II aka Suave aka Suave

Luciano, in the County of New York and elsewhere, from on or about August 28, 2023,

to on or about July 30, 2024, knowing that the property involved in one or more

financial transactions represented the proceeds of criminal conduct, conducted one or

more such financial transactions which in fact involved the proceeds of specified

criminal conduct, knowing that the transaction or transactions in whole or in part were

designed to conceal and disguise the nature, the location, the source, the ownership and

the control of the proceeds of criminal conduct, and the total value of the property

involved in such financial transaction or transactions exceeded fifty thousand dollars.

ALVIN L. BRAGG, JR.

District Attorney

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	THE PEOPLE OF THE STATE OF NEW YORK			
	Ingrid Lewis-Martin, Glenn D. Martin II aka Suave aka Suave Luciano, Raizada Vaid aka Pinky, and Mayank Dwivedi  Defendants.			
	INDICTMENT			

CONSPIRACY IN THE FOURTH DEGREE, P.L. § 105.10(1)
BRIBERY IN THE FIRST DEGREE, P.L. § 200.04 – DEF Vaid – 1 count, DEF Dwivedi – 1 count
BRIBE RECEIVING IN THE FIRST DEGREE, P.L. § 200.12 – DEF Lewis-Martin – 1 count, DEF Martin II – 1 count

MONEY LAUNDERING IN THE THIRD DEGREE, P.L. § 470.10(1)(b)(ii)(A)(iii)— DEF Lewis-Martin – 1 count, DEF Martin II – 1 count

# ALVIN L. BRAGG, JR., District Attorney

A True Bill

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

ADJOURNED TO PART \_\_\_\_\_ON \_\_\_\_\_