

OFFERING A FALSE INSTRUMENT FOR FILING FIRST DEGREE

COPY

STATE OF NEW YORK
TOWN OF GREECE

COUNTY OF MONROE
JUSTICE COURT

THE PEOPLE OF THE STATE OF NEW YORK

FELONY COMPLAINT

v.

Robert P. Trowbridge (03/28/55)
Hilton, N.Y.

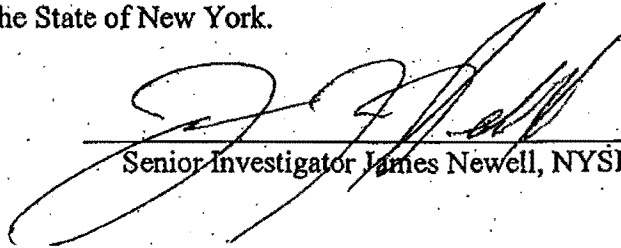
The complainant, SENIOR INVESTIGATOR JAMES NEWELL, being duly sworn, deposes and states that he is a member of the New York State Police and is assigned to the Rochester office on Scottsville Road, Rochester, NY. That during the month of April, 2002, at the location known as The Town of Greece Police Department, 400 Island Cottage Road, in the Town of Greece, County of Monroe, State of New York, defendant Robert Trowbridge knowingly and unlawfully committed the Class E Felony of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in violation of New York State Penal Law § 20.00 and § 175.35, in that the defendant, acting alone or in concert with another or others, at the aforesaid date, time and place, knowing that a written instrument contained a false statement or statement or false information, and with intent to defraud the state or any political subdivision or public authority of the state, offered or presented such instrument to a public office, public servant or public authority with the knowledge or belief that it would be filed with, registered or recorded in or otherwise become part of the records of such public office, public servant or public authority.

TO WIT: That during April, 2002, defendant knowing that a written instrument, to wit: the background investigation report of police officer candidate Gary Pignato, contained a false statement(s) or false information, and with the intent to defraud the Town of Greece, offered or presented the instrument to the Town of Greece or a public servant employed by the Town of Greece, knowing or having the belief that it would be filed with, registered or recorded in or otherwise become part of the records of the Town of Greece.

The above factual allegations are based upon information and belief the source of which includes interviews of Mayor Robert Duffy, former RPD Deputy Chief Vincent Faggiano, and former RPD Deputy Chief James Shepard, a review of the background investigation report filed with the Town of Greece, and a conversation with the defendant during which he admitted falsifying and offering or presenting said background report to Town of Greece Police Department Chief Merritt Rahn for purposes of filing or becoming a part of the records of the Town of Greece and/or Town of Greece Police Department, and with the intent to defraud the same. Defendant further stated that this action was done at the direction of and with the knowledge of then-Chief Merritt Rahn.

NOTICE: False statements made herein are punishable as a Class A misdemeanor pursuant to section 210.40 of the Penal Law of the State of New York.

Sworn to this 7th day of July, 2009


Senior Investigator James Newell, NYSP