

SLD:MJR/KAN  
F.#2006R02347/NY-NYE-0479

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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Block, J.  
Orenstein, MJ

UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

Cr. No. 06-845  
(T. 21, U.S.C.,  
§§ 841(a)(1),  
841(b)(1)(D), 841(b)(2),  
853(p) and 846; T. 18,  
U.S.C., §§ 2, 982,  
1956(h) and 3551 et seq.)

ANTONIO QUINONES,  
also known as "Tony,"  
JOSE LOPEZ,  
also known as "Pepe,"

[REDACTED]

HERMAN QUINONES,

[REDACTED]

MICHAEL DEPINILLOS,

[REDACTED]

Defendants.

-----X

THE GRAND JURY CHARGES:

COUNT ONE  
(Distribution Conspiracy)

1. In or about and between January 2004 and December 2006, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants ANTONIO QUINONES, also known as "Tony," JOSE LOPEZ, also known as "Pepe," [REDACTED] "HERMAN QUINONES, [REDACTED] MICHAEL DEPINILLOS, [REDACTED] and [REDACTED] together with others, did knowingly and intentionally conspire to distribute and possess with the intent to distribute one or more controlled substances, which

offense involved substances containing (a) phendimetrazine tartrate, a Schedule III controlled substance, (b) hydrocodone bitartate, a Schedule III controlled substance, (c) zolpidem tartrate, a Schedule IV controlled substance, and (d) phentermine, a Schedule IV controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Sections 846, 841(b)(1)(D) and 841(b)(2); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWO  
(Distribution)

2. In or about and between January 2004 and December 2006, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants ANTONIO QUINONES, also known as "Tony," JOSE LOPEZ, also known as "Pepe," [REDACTED] " HERMAN QUINONES, [REDACTED] MICHAEL DEPINILLOS, [REDACTED] and [REDACTED] together with others, did knowingly and intentionally distribute and possess with the intent to distribute one or more controlled substances, which offense involved substances containing (a) phendimetrazine tartrate, a Schedule III controlled substance, (b) hydrocodone bitartate, a Schedule III controlled substance, (c) zolpidem tartrate, a

Schedule IV controlled substance, and (d) phentermine, a Schedule IV controlled substance.

(Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(D) and 841(b)(2); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT THREE  
(Money Laundering Conspiracy)

3. In or about and between January 2004 and December 2006, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants ANTONIO QUINONES, also known as "Tony," JOSE LOPEZ, also known as "Pepe," [REDACTED], "HERMAN QUINONES, MICHAEL DEPINILLOS, [REDACTED] together with others, did knowingly and intentionally conspire to conduct financial transactions, in and affecting interstate and foreign commerce, to wit: the transfer and delivery of United States currency, which in fact involved the proceeds of specified unlawful activity, to wit: narcotics trafficking, in violation of Title 21, United States Code, Section 846, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, with the intent to promote the carrying on of the

specified unlawful activity, in violation of Title 18, United States Code, Sections 1956(a) (1) (A) (i).

(Title 18, United States Code, Sections 1956(h) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATIONS AS TO COUNTS ONE AND TWO  
(Distribution Conspiracy and Distribution)

4. The United States hereby gives notice to the defendants charged in Counts One and Two that, upon their conviction of any such offense, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853, which requires any person convicted of such offenses to forfeit any property constituting, or derived from, proceeds obtained, directly or indirectly, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offenses, including but not limited to the following:

- a. A sum of money in the amount of \$42,681,603.29;
- b. All rights title and interest in Bank of America account number 005505639146, held in the name of Antonio Quinones;
- c. All rights title and interest in Colonial Bank account number 8034149982, held in the name of The Doctor's Online, Inc.

- d. All rights title and interest in Colonial Bank account number 8034151269, held in the name of Antonio Quinones;
- e. All rights title and interest in Regions Bank account number 616853602, held in the name Health Rx Marketing;
- f. All rights title and interest in Regions Bank account number 8310547818, held in the name of Health Rx Marketing;
- g. All rights title and interest in Regions Bank account number 8310370872, held in the name of The Doctors Online, Inc.;
- h. All rights title and interest in Regions Bank account number 9601618367, held in the name of Elena C. Quinones;
- i. All rights title and interest in Regions Bank account number 9601226344, held in the name of Antonio Quinones;
- j. All rights title and interest in Wachovia Bank account number 1010028242156, held in the name of Antonio R. Quinones;
- k. All rights title and interest in Wachovia Bank account number 20000274118851, held in the name of Lexa Investment Corp.;

- l. All rights title and interest in Wachovia Bank account number 1010028242172, held in the name of Antonio Quinones;
- m. All rights title and interest in Washington Mutual account number 0097-00170967-4, held in the name of Brothers Pharmacy, Inc.;
- n. All rights title and interest in Washington Mutual account number 938153749, held in the name of Antonio R. Quinones;
- o. All rights title and interest in Washington Mutual account number 1811446102, held in the name of Antonio R. Quinones;
- p. All rights title and interest in Washington Mutual account number 324-650244-2, held in the name of Elena C. Quinones, Cust. for Nathalie Quinones;
- q. All rights title and interest in Washington Mutual account number 324-650246-8, held in the name of Elena C. Quinones, Cust. for Anthony Quinones;
- r. All rights title and interest in Wachovia account number 2000027418660, held in the name of 147 Avenue Homes, Inc.;
- s. All rights title and interest in Wachovia account number 2000027404218, held in the name of 147 Avenue Homes Phase II;

- t. All rights title and interest in Wachovia account number 2000027419070, held in the name of 147 Avenue Homes Phase III, Inc.;
- u. All rights title and interest in a Ferrari Spyder convertible, VIN# ZFFEW59A350143384, registered to Antonio Quinones;
- v. All rights title and interest in a black 2006 Honda pickup truck, VIN number 2HJYK16536H552582, registered to Anthony Quinones;
- w. All rights title and interest in a 2002 Sea Ray, bearing registration number CG1129417 and hull number SERY0962C202 and registered to Antonio Quinones;
- x. All rights title and interest in a silver 2007 Mercedes Benz GL450, VIN 4JGBF71E47A150980, registered to Antonio Quinones;
- y. All rights title and interest in a white 2005 BMW, VIN WBSBR93485PK09317, registered to Gallope Grp of S Fla, Inc.;
- z. All rights title and interest in a 2005 Cadillac Escalade, VIN 1GYEC63T25R116481, registered to All Services Consultants, Inc.;
- aa. All rights title and interest in the Florida real property identified as Parcel No. 30-4916-000-

- 0612, held in the name of 147 Avenue Homes Phase II, Inc;
- bb. All rights title and interest in the Florida real property identified as Parcel No. 30-4916-000-0614, held in the name of 147 Avenue Homes Phase II, Inc.;
- cc. All rights title and interest in the Florida real property identified as Parcel No. 30-4916-000-0615, held in the name of 147 Avenue Homes, Inc.;
- dd. All rights title and interest in the Florida real property identified as Parcel No. 30-4916-000-0616, held in the name of 147 Avenue Homes Phase III;
- ee. All rights title and interest in the Florida real property identified as Parcel No. 30-4003-006-0430, 8605 SW 2<sup>nd</sup> Street, Miami, Florida 33144, held in the name of Barbara Rodriguez;
- ff. All rights title and interest in the Florida real property identified as Parcel No. 02-3214-019-0920, a condominium unit located at 5225 Collins Avenue, #508 Miami, Florida 33140, held in the name of Antonio Quinones; and
- gg. All rights title and interest in the Florida real property identified as Parcel No. 31-2211-069-

2120, a condominium unit located at 18001 Collins Avenue, #1810, Sunny Island Beach, Florida 33140, held in the name of Antonio Quinones.

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:
- a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or deposited with, a third party;
  - c. has been placed beyond the jurisdiction of the court;
  - d. has been substantially diminished in value; or
  - e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of such defendants up to the value of the forfeitable property described in this forfeiture allegation, including but not limited to, all rights title and interest in the Florida real property identified as Parcel No. 30-4915-041-0060, 2731 SW 140<sup>th</sup> Avenue, Miami, FL 33175, held in the name of Antonio Quinones.

(Title 21, United States Code, Section 853(p))

CRIMINAL FORFEITURE ALLEGATION AS TO COUNT THREE  
(Money Laundering Conspiracy)

6. The United States hereby gives notice to the defendants charged in Count Three that, upon their conviction of such offense, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982, of all property involved in each offense of conviction in violation of Title 18, United States Code, Section 1956, or conspiracy to commit such offense, and all property traceable to such property as a result of the defendants' conviction of Count Three of this indictment, including but not limited to, the following:

- a. A sum of money in the amount of \$42,681,603.29;
- b. All rights title and interest in Bank of America account number 005505639146, held in the name of Antonio Quinones;
- c. All rights title and interest in Colonial Bank account number 8034149982, held in the name of The Doctor's Online, Inc.;
- d. All rights title and interest in Colonial Bank account number 8034151269, held in the name of Antonio Quinones;
- e. All rights title and interest in Regions Bank account number 616853602, held in the name Health Rx Marketing;

- f. All rights title and interest in Regions Bank account number 8310547818, held in the name of Health Rx Marketing;
- g. All rights title and interest in Regions Bank account number 8310370872, held in the name of The Doctors Online, Inc.;
- h. All rights title and interest in Regions Bank account number 9601618367, held in the name of Elena C. Quinones;
- i. All rights title and interest in Regions Bank account number 9601226344, held in the name of Antonio Quinones;
- j. All rights title and interest in Wachovia Bank account number 1010028242156, held in the name of Antonio R. Quinones;
- k. All rights title and interest in Wachovia Bank account number 20000274118851, held in the name of Lexa Investment Corp.;
- l. All rights title and interest in Wachovia Bank account number 1010028242172, held in the name of Antonio Quinones;
- m. All rights title and interest in Washington Mutual account number 0097-00170967-4, held in the name of Brothers Pharmacy, Inc.;

- n. All rights title and interest in Washington Mutual account number 938153749, held in the name of Antonio R. Quinones;
- o. All rights title and interest in Washington Mutual account number 1811446102, held in the name of Antonio R. Quinones;
- p. All rights title and interest in Washington Mutual account number 324-650244-2, held in the name of Elena C. Quinones, Cust. for Nathalie Quinones;
- q. All rights title and interest in Washington Mutual account number 324-650246-8, held in the name of Elena C. Quinones, Cust. for Anthony Quinones;
- r. All rights title and interest in Wachovia account number 2000027418660, held in the name of 147 Avenue Homes, Inc.;
- s. All rights title and interest in Wachovia account number 2000027404218, held in the name of 147 Avenue Homes Phase II;
- t. All rights title and interest in Wachovia account number 2000027419070, held in the name of 147 Avenue Homes Phase III, Inc.;
- u. All rights title and interest in a Ferrari Spyder convertible, VIN# ZFFEW59A350143384, registered to Antonio Quinones;

- v. All rights title and interest in a black 2006 Honda pickup truck, VIN number 2HJYK16536H552582, registered to Anthony Quinones;
- w. All rights title and interest in a 2002 Sea Ray, bearing registration number CG1129417 and hull number SERY0962C202 and registered to Antonio Quinones;
- x. All rights title and interest in a silver 2007 Mercedes Benz GL450, VIN 4JGBF71E47A150980, registered to Antonio Quinones;
- y. All rights title and interest in a white 2005 BMW, VIN WBSBR93485PK09317, registered to Gallope Grp of S Fla, Inc.;
- z. All rights title and interest in a 2005 Cadillac Escalade, VIN 1GYEC63T25R116481 owned by All Services Consultants, Inc.;
- aa. All rights title and interest in the Florida real property identified as Parcel No. 30-4916-000-0612, held in the name of 147 Avenue Homes Phase II, Inc.;
- bb. All rights title and interest in the Florida real property identified as Parcel No. 30-4916-000-0614, held in the name of 147 Avenue Homes Phase II, Inc.;

- cc. All rights title and interest in the Florida real property identified as Parcel No. 30-4916-000-0615, held in the name of 147 Avenue Homes, Inc.;
- dd. All rights title and interest in the Florida real property identified as Parcel No. 30-4916-000-0616, held in the name of 147 Avenue Homes Phase III;
- ee. All rights title and interest in the Florida real property identified as Parcel No. 30-4003-006-0430, 8605 SW 2<sup>nd</sup> Street, Miami, Florida 33144, held in the name of Barbara Rodriguez;
- ff. All rights title and interest in the Florida real property identified as Parcel No. 02-3214-019-0920, a condominium unit located at 5225 Collins Avenue, #508 Miami, Florida 33140, held in the name of Antonio Quinones; and
- gg. All rights title and interest in the Florida real property identified as Parcel No. 31-2211-069-2120, a condominium unit located at 18001 Collins Avenue, #1810, Sunny Island Beach, Florida 33140, held in the name of Antonio Quinones.

7. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982, to seek forfeiture of any other property of such defendants up to the value of the forfeitable property described in this forfeiture allegation, including but not limited to, all rights title and interest in the Florida real property identified as Parcel No. 30-4915-041-0060, 2731 SW 140<sup>th</sup> Avenue, Miami, FL 33175, held in the name of Antonio Quinones.

(Title 18, United States Code, Section 982)

A TRUE BILL

*Deborah Goh*  
Deputy FOREPERSON

\_\_\_\_\_  
ROSLYNN R. MAUSKOPF  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

BY: *[Signature]*  
ACTING UNITED STATES ATTORNEY  
PURSUANT TO 28 C.F.R. 0.136

THIS FORM IS TO BE ATTACHED TO THE 10" x 15" ENVELOPE AND PRESENTED TO THE CLERK'S OFFICE

GRAND JURY INVESTIGATIONS

*No related cases*

COVERING MEMORANDUM FOR SEALED DOCUMENTS

*Queen's*

**CR 06**

**845**

DATE GRAND JURY WAS EMPANELLED

*January 2005*

**BLOCK, J.**

DATE OF SEALING

*12/21/06*

TIME

SEALED BY

(Individual physically sealing envelope)

**LORENSTEIN, M.J.**

AS PER ORDER OF

*Magistrate Judge Orenstein*

DOCUMENT ENCLOSED

*Info Sheet, Indictment and Arrest Warrant.*

(Eg., immunity order, extension order, etc.)

ASSISTANT U.S. ATTORNEY/SPECIAL PROSECUTOR IN CHARGE

*Michael J. Ramos*

U.S. ATTORNEY'S FILE NUMBER F#

*2006 R02347*

This form is to be completed by the courtroom deputy if papers are sealed in open court or in chambers, or by the Assistant U.S. Attorney or Special Prosecutor when the courtroom deputy is present at the time of the application.

The form will be completed by the individual in charge in the Clerk's Office only if the package presented in an unsealed manner and adequate information is available from counsel.

Please note papers will be filed chronologically according to the date the particular Grand Jury was empanelled. Therefore, this date must be provided by the prosecutor or papers will not be accepted for filing by the Clerk's office.

This form is used for filing and retrieval purposes and is not part of the official record of case.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

-against-

UNSEALING ORDER

ANTONIO QUINONES,  
JOSE LOPEZ,  
also known as "Pepe,"  
HERMAN QUINONES and  
MICHAEL DEPINILLOS,

Defendants.

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Upon application of the United States Attorney's Office for the Eastern District of New York, by Assistant United States Attorney Michael J. Ramos, it is hereby

ORDERED that the above-captioned indictment be UNSEALED only as to the defendants ANTONIO QUINONES, JOSE LOPEZ, also known as "Pepe," HERMAN QUINONES and MICHAEL DEPINILLOS, and

IT IS FURTHER ORDERED that the above-captioned indictment shall remain sealed as to all other defendants.

Dated: Brooklyn, New York  
December 21, 2006



UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK