

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

17-60207

CASE NO. **CR-ZLOCH**

**MAGISTRATE JUDGE**  
**SNOW**

18 U.S.C. § 2  
18 U.S.C. § 982  
18 U.S.C. § 1343  
18 U.S.C. § 1344  
18 U.S.C. § 1349  
18 U.S.C. § 1956(h)  
18 U.S.C. § 1956(a)(1)(A)(i)

UNITED STATES OF AMERICA

v.

HENRY QUINTERO-LOPEZ,  
a/k/a Henry J. Quintero,  
LAZARO VILLALBA,  
DAHOMEY TALAVERA,  
RUBEN JIMENEZ,  
ANTONIO C. RAMOS,  
JOAQUIN M. PEREA,  
RAUL ERIC GARCIA,  
a/k/a Eric Garcia,  
MARTINE YANISSE CASTRILLON,  
FELIPE M. NUNEZ,  
MICHELLE VOLCY,  
LUC BRUNA,  
MAYKEL CLAVERO-GONZALEZ,  
a/k/a Maykel Clavero,  
IRAY PONTE,  
NIDIÁ RODRIGUEZ-RIAL,  
a/k/a Nidia Rodriguez,  
and  
ILIANA LIMA,

Defendants.

**INDICTMENT**

The Grand Jury charges that:

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U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

## GENERAL ALLEGATIONS

At various times relevant to this Indictment:

1. Defendant HENRY J. QUINTERO and LAZARO VILLALBA were individuals who held themselves out to be real estate investors.

2. New World International Inc. was a Florida corporation incorporated on January 27, 2003, with Defendant HENRY J. QUINTERO, listed as Director president and Defendant LAZARO VILLALBA listed as Vice-president.

3. D & H Investments of South Florida, Inc., was a Florida corporation incorporated on June 9, 2003, with Defendant DAHOMEY TALAVERA, who is listed as the incorporator.

4. Defendants HENRY J. QUINTERO and LAZARO VILLALBA would locate homes for sale in the Southwest Ranches area of Broward County, Florida. Defendants HENRY J. QUINTERO and LAZARO VILLALBA would offer the owner's full asking price and then inflate the contract purchase price to allow New World International and D & H Investments of South Florida to realize a finders fee or assignment fee.

5. Defendants HENRY J. QUINTERO and LAZARO VILLALBA would locate individuals who, for a fee, would be willing to be straw buyers of the real property selected.

6. Defendant ANTONIO RAMOS was employed as a loan officer at Home Mortgage Finance Group Corp., located at 9370 S.W. 72<sup>nd</sup> Street, Room A240, Miami, Florida and was responsible for preparing mortgage applications to be submitted to lenders, for the purchase of real property.

7. Defendant RUBEN JIMENEZ was employed as a loan officer at Lenders Choice Mortgage Services, located at 13930 SW 47<sup>th</sup> Street, Suite 203, Miami, Florida, and was responsible for preparing mortgage applications to be submitted to lenders for the purchase of real property.

8. Defendant JOAQUIN M. PEREA was the owner of J.P. Insurance and Accounting Service, located at 9766 Coral Way Miami, Florida. Defendant PEREA, would for a fee, prepare false and fraudulent pay stubs and IRS Form W-2s based on information provided by the requestor of the documents.

9. Defendant ERIC GARCIA was a licensed State of Florida registered trainee property appraiser, who was responsible for preparing appraisals for mortgages under the supervision and review of R. P., who was an employee of Pena Appraisal, located at 5402 West Flagler, Coral Gables, Florida. Said appraisals, when submitted as part of the mortgage application process to a lender, were relied upon to determine the value of real property.

10. Defendant MARTINE YANISSE CASTRILLON was a licensed State of Florida registered trainee property appraiser and responsible for preparing appraisals for mortgages under the supervision and review of C. P., who was employed at Appraisal by Design, located at 1198 Venetian Way, Suite 207, Miami Beach, Florida. Said appraisals, when submitted as part of the mortgage application process to a lender, were relied upon to determine the value of real property. Defendant CASTRILLON fraudulently submitted appraisals that she claimed were reviewed by C.P., when in truth and in fact they were not.

11. Defendant FELIPE NUNEZ resided in Miami-Dade County, Florida and, at defendants HENRY J. QUINTERO and LAZARO VILLALBA's direction, served as a straw buyer of two properties.

12. Defendant MICHELE VOLCY resided in Broward County and, at defendants HENRY J. QUINTERO and LAZARO VILLALBA's direction, served as a straw buyer of one property.

13. Defendant LUC BRUNA resided in Broward County and, at defendants QUINTERO and LAZARO VILLALBA's direction, served as a straw buyer of one property.

14. Defendant MAYKEL CLAVERO resided in Miami-Dade County, Florida and, at defendants QUINTERO and LAZARO VILLALBA's direction, served as a straw buyer of one property.

15. Defendant IRAY PONTE resided in Miami-Dade County, Florida and, at defendants QUINTERO and LAZARO VILLALBA's direction, served as a straw buyer of one property.

16. Defendant ILLIANA LIMA resided in Miami-Dade County, Florida and, at defendants HENRY J. QUINTERO and LAZARO VILLALBA's direction, served as a straw buyer of one property.

17. Lehman Brothers Bank, FSB, was a financial institution located in Gaithersburg, Maryland, whose accounts were insured by the Federal Deposit Insurance Corporation. Lehman Brothers Bank, FSB conducted mortgage lending in the Southern District of Florida.

18. New Century Financial Corporation was a mortgage lender located in Irvine, California and conducted mortgage lending in the Southern District of Florida.

19. Master Financial Incorporated., was a mortgage lender located in Orange, California and conducted mortgage lending in the Southern District of Florida.

20. WMC Mortgage Corporation. was a mortgage lender located in Woodland Hills, California and conducted mortgage lending in the Southern District of Florida.

21. First Franklin Financial Corporation was a mortgage lender located in San Jose, California and conducted mortgage lending in the Southern District of Florida.

**COUNT 1**

**Conspiracy to Commit Bank Fraud, Mail Fraud, and Wire Fraud**

**(18 USC §1349)**

22. Paragraphs 1 through 21 of the General Allegations section of this indictment are realleged and incorporated fully herein by reference.

23. From on or about August 2, 2003, and continuing through on or about April 25, 2007, the exact dates being unknown to the grand jury, in Broward and Miami-Dade Counties, in the Southern District of Florida, and elsewhere, the defendants,

HENRY J. QUINTERO-LOPEZ,  
a/k/a Henry J. Quintero,  
LAZARO VILLALBA,  
DAHOMEY TALAVERA,  
RUBEN JIMENEZ,  
ANTONIO C. RAMOS,  
JOAQUIN M. PEREA,  
RAUL ERIC GARCIA,  
a/k/a Eric Garcia,  
MARTINE YANISSE CASTRILLON,  
FELIPE NUNEZ,  
MICHELLE VOLCY,  
LUC BRUNA,  
MAYKEL CLAVERO-GONZALEZ,

a/k/a Maykel Clavero,  
IRAY PONTE,  
NIDIA RODRIGUEZ-RIAL,  
and  
ILIANA LIMA,

did knowingly and willfully combine, conspire, confederate, and agree with each other and with persons known and unknown to the grand jury, to commit certain offenses against the United States, namely:

- a. Bank Fraud, in violation of Title 18, United States Code, Section 1344;
- b. Mail Fraud, in violation of Title 18, United States Code, Section 1341 and
- c. Wire Fraud, in violation of Title 18, United States, Section 1343.

Purpose and Object of Conspiracy

24. It was the purpose and object of the conspiracy for the defendants to unlawfully enrich themselves by: (a) selecting properties that the owners / sellers would be willing to overstate the sales price and /or pay a consulting fee; (b) locating appraisers willing to prepare appraisal report based on values submitted by the defendants ( c) obtaining false and fraudulent Verification of Employment Form 1005, pay stubs, bank statements; Verification of Deposit forms, and IRS Form W-2 Wage and Tax Statements, rental verifications, rental leases, cancelled checks; (d) submitting false and fraudulent mortgage loan applications Form 1003, and related documents to banks and other lending institutions, thereby inducing the banks and other lending institutions to make loans to straw buyer purchasers; ( e) concealing the submissions of the false and fraudulent applications

and documents and the receipt and transfer of fraud proceeds, and (f) diverting fraud proceeds for their personal use and benefit and to further the conspiracy.

Manner and Means of the Conspiracy

The manner and means by which the defendants sought to accomplish the purpose and object of the conspiracy included, among others, the following:

25. Defendants HENRY J. QUINTERO and LAZARO VILLALBA, would identify owners / sellers of residential properties that were available for purchase, who would be willing to overstate the true selling price and pay the difference in the original asking price and the overstated amount to Defendants HENRY J. QUINTERO and LAZARO VILLALBA.

26. Defendants HENRY J. QUINTERO and LAZARO VILLALBA would recruit and pay straw individuals to pose as buyers at the closings and participate in the purchase of the selected properties.

27. Defendants HENRY J. QUINTERO, LAZARO VILLALBA, and ANTONIO RAMOS would prepare and cause to be prepared false and fraudulent mortgage loan applications, including false employment verifications, pay stubs, income and funds on deposit, and IRS Form W-2's for straw buyers.

28. Defendants HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ and JOAQUIN M. PEREA would prepare and cause to be prepared false mortgage loan applications, including fraudulent Verification of Employment (VOE's) Form 1005, pay stubs, income and funds on deposit, and IRS Form W-2s for straw buyers.

29. Defendants HENRY J. QUINTERO, LAZARO VILLALBA, ERIC GARCIA and MARTINE YANISSE CASTRILLON on the properties for sale, would cause to be prepared fraudulent appraisals of the properties reflecting inflated property values, in order to support the contracted overstated sales prices and mortgage loan applications for the straw buyers.

30. Defendants HENRY J. QUINTERO, LAZARO VILLALBA and the straw buyers would create and cause to be created and submitted to the banks and lending institutions HUD-Settlement Statement Forms, also known as HUD-1'S, that falsely stated that the straw buyers brought their own funds to the closing of the transactions as indicated at line 303 of the forms, when, in truth and in fact, the straw buyers brought no such funds to the closing.

31. Defendants HENRY J. QUINTERO, LAZARO VILLALBA and the straw buyers would fail to make payments on the loans obtained as part of the scheme, causing some properties to go into foreclosure and causing the banks and lending institutions to suffer substantial losses.

#### **OVERT ACTS**

In furtherance of the conspiracy, and to effect the objects thereof, at least one of the following overt acts, among others, was committed by at least one of the co-conspirators in the Southern District of Florida

A. Property located at 6402 SW 185<sup>th</sup> Way, Southwest Ranches, Florida

32. On or about September 2, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA and IRAY PONTE prepared and executed, and caused to be prepared and executed, a contract for sale and purchase for the residence located at 6402 SW 185<sup>th</sup> Way, Southwest Ranches, Florida, for the purchase price of \$775,000.



33. On or about September 2, 2003, defendant IRAY PONTE issued a check in the amount of \$1,000 payable to Florida Title & Escrow for deposit on the residence located at 6402 SW 185<sup>th</sup> Way, Southwest Ranches, Florida.

34. On or about September 8, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ, and IRAY PONTE prepared and executed a fraudulent mortgage application Form 1003 and caused it to be forwarded to Lenders Choice Mortgage Services Inc., in the name of defendant IRAY PONTE.

35. On or about September 8, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA and RUBEN JIMENEZ prepared and executed, and caused to be prepared and executed, a fraudulent Verification of Employment Form 1005 for defendant IRAY PONTE to be sent to Duarte Produce, 2101 NW 15<sup>th</sup> Avenue, Miami, Florida.

36. On or about September 8, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA, and IRAY PONTE prepared, and caused to be prepared, false and fraudulent bank statements significantly overstating the amount of money on deposit in defendant IRAY PONTE's Washington Mutual bank account.

37. On or about September 8, 2003, defendants HENRY J. QUINTERO and LAZARO VILLALBA prepared and caused to be prepared, a false and fraudulent W-2 forms for employment of defendant IRAY PONTE at Duarte Produce, 2101 NW 15<sup>th</sup> Avenue, Miami, Florida for the tax years 2001 and 2002.

38. On or about September 8, 2003, defendants HENRY J. QUINTERO and LAZARO VILLALBA prepared and caused to be prepared, false and fraudulent pay-stub for employment of defendant IRAY PONTE at Duarte Produce, 2101 NW 15<sup>th</sup> Avenue, Miami, Florida.

39. On or about September 10, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA and ERIC GARCIA caused a fraudulent property appraisal to be performed by Pena Appraisal Services, Inc., at the property located at 6402 SW 18<sup>th</sup> Way, Southwest Ranches, Florida.

40. On or about October 10, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA and RUBEN JIMENEZ mailed a completed false loan application package, via Airborne Express, to Lehman Brothers Federal Savings Bank, 300 Professional Drive, Suite 500, Gaithersburg, MD 20879.

41. On or about October 17, 2003, defendant RUBEN JIMENEZ caused a fax reflecting two false and fraudulent Form W-2s for employment of defendant IRAY PONTE at Duarte Produce, to be sent from Lenders Choice Mortgage Services in Miami, Florida to Lehman Brothers Federal Savings Bank, 300 Professional Drive, Suite 500, Gaithersburg, MD 20879.

42. On or about October 29, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ and IRAY PONTE caused Lehman Brothers Federal Savings Bank in Gaithersburg, MD, to approve a first mortgage loan to defendant IRAY PONTE in the amount of \$620,000.

43. On or about October 29, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ and IRAY PONTE caused Lehman Brothers Federal Savings Bank in Gaithersburg, MD, to approve a second mortgage loan to defendant IRAY PONTE in the amount of \$150,000.

44. On or about October 29, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ and IRAY PONTE caused Lehman Brothers Federal Savings Bank to wire transfer \$637,667.66 to Florida Title and Escrow, located in Weston, Florida.

45. On or about October 29, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ and IRAY PONTE caused Lehman Brothers Federal Savings Bank to wire transfer \$152,740.77 to Florida Title and Escrow, located in Weston, Florida.

46. On October 29, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA, and IRAY PONTE caused Florida Title and Escrow to disburse \$62,000 of the loan proceeds to D & H Investments of South Florida, Inc.

47. On October 30, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA and IRAY PONTE caused Florida Title and Escrow to apply \$42,405.82 of the \$62,000 due to D & H Investments of South Florida, Inc., to the closing costs for the PONTE mortgage.

48. On October 30, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA and IRAY PONTE caused Florida Title and Escrow to pay the remaining \$19,594.18 of the \$62,000 authorized to D & H Investments of South Florida, Inc.

49. On or about October 30, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ and IRAY PONTE caused Florida Title and Escrow to issue check number 9036 in the amount of \$31,980 to Lenders Choice Mortgage Services, Inc. as fees for processing the loan on the property located at 6402 SW 185th Way, Southwest Ranches, Florida.

50. On or about October 30, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ and IRAY PONTE caused Florida Title and Escrow to issue check number 9046 in the amount of \$8,082.50 to Lenders Choice Mortgage Services, Inc. as fees for processing the loan on the property located at 6402 SW 185th Way, Southwest Ranches, Florida.

51. On or about November 11, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA and DAHOMEY TALAVERA caused D & H Investments of South Florida, Inc. to

issue check number 1036, in the amount of \$20,000 payable to defendant IRAY PONTE, drawn on D & H Investments of South Florida, Inc. account at Washington Mutual Bank.

52. On August 24, 2005, defendant IRAY PONTE, via a quit claim deed, conveyed his interest and title in the property located at 6402 SW 185<sup>th</sup> Way, Southwest Ranches to defendant DAHOMEY TALAVERA.

53. On April 25, 2007, defendant DAHOMEY TALAVERA signed a residential sale and purchase contract to sell the property located at 6402 SW 185<sup>th</sup> Way, Southwest Ranches, Broward County Florida, to P. Y. for \$1,450,000.

B. Property located at 17501 SW 56<sup>th</sup> Street, Southwest Ranches, Florida

54. On or about August 19, 2003, defendants HENRY J. QUINTERO and LAZARO VILLALBA, acting as D & H Investments of South Florida, Inc., executed a contract for sale and purchase of the property located at 17501 SW 56<sup>th</sup> Street, Southwest Ranches, Florida, for the purchase price of \$750,000.

55. On or about September 10, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA and ERIC GARCIA caused a fraudulent property appraisal to be performed by Pena Appraisal Services, Inc., on the property located at 17501 SW 56<sup>th</sup> Street, Southwest Ranches, Florida.

56. On or about October 21, 2003, defendant MICHELLE VOLCY executed a contract for sale and purchase of the property located at 17501 SW 56<sup>th</sup> Street, Southwest Ranches, Florida, for the purchase price of \$750,000.

57. On or about October 21, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA, caused a \$1,000 deposit check, drawn on defendant MICHELLE VOLCY'S Bank Atlantic account, to be provided to Florida Title and Escrow for the purchase of the property located at 17501 SW 56<sup>th</sup> Street, Southwest Ranches, Florida.

58. On or about November 13, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ and MICHELLE VOLCY prepared and executed a fraudulent mortgage application Form 1003, forwarded to Lenders Choice Mortgage Service, Inc., in the name of defendant MICHELLE VOLCY.

59. On or about November 13, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA and RUBEN JIMENEZ prepared and executed, and caused to be prepared and executed, a fraudulent Verification of Employment Form 1005 for defendant MICHELLE VOLCY to be sent to JAP Publishing, 446-B, Hunter Street, West Palm Beach, Florida.

60. On or about November 13, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA and RUBEN JIMENEZ prepared and executed, and caused to be prepared and executed, a false Verification of Employment Form 1005 for defendant MICHELLE VOLCY to be sent to C.K. Dockside Services, Inc., 449 NW 7<sup>th</sup> Street, Boca Raton, Florida.

61. On or about November 13, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA and MICHELLE VOLCY prepared, and caused to be prepared, false and fraudulent bank statements, significantly overstating the amount of money on deposit in defendant MICHELLE VOLCY'S Bank Account.

62. On or about November 13, 2003, defendants HENRY J. QUINTERO and LAZARO VILLALBA caused to be prepared false and fraudulent pay stubs, showing defendant MICHELLE VOLCY's employment at JAP Publishing.

63. On or about December 18, 2003, defendant RUBEN JIMENEZ caused Lenders Choice Mortgage Services in Miami, Florida, to fax a fraudulent letter to Lehman Brothers Federal Savings Bank in Gaithersburg, Maryland, fraudulently certifying that JAP Publishing was contacted by telephone and verified the employment of defendant MICHELLE VOLCY.

64. On or about December 29, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ and MICHELLE VOLCY, caused Lehman Brothers Federal Savings Bank, in Gaithersburg, MD 20879, to approve a first mortgage loan to defendant MICHELLE VOLCY in the amount of \$600,000.

65. On or about December 29, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ and MICHELLE VOLCY caused Lehman Brothers Federal Savings Bank, in Gaithersburg, MD 20879, to approve a second mortgage loan to defendant MICHELLE VOLCY in the amount of \$150,000.

66. On or about December 29, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA and MICHELLE VOLCY prepared and executed, and caused to be prepared and executed, an addendum to the contract for purchase and sale of the residence located at 17501 SW 56<sup>th</sup> Street, Southwest Ranches, Florida, obligating the seller of the property to pay a \$100,000 finders fee to New World International, Inc.

67. On December 29, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ and MICHELLE VOLCY caused Lehman Brothers Federal Savings Bank, in Gaithersburg, MD 20879, to wire transfer \$609,840.01 to Florida Title and Escrow located in Weston, Florida.

68. On December 29, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ and MICHELLE VOLCY caused Lehman Brothers Federal Savings Bank, in Gaithersburg, MD 20879, to wire transfer \$152,334.81 to Florida Title and Escrow located in Weston, Florida.

69. On December 29, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ and MICHELLE VOLCY caused Florida Title and Escrow to issue check number 9767 in the amount of \$20,480 to Lenders Choice Mortgage Services, Inc., as fees for processing the loan on the property located at 17501 SW 56<sup>th</sup> Street, Southwest Ranches, Florida.

70. On December 29, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ and MICHELLE VOLCY caused Florida Title and Escrow to issue check number 9769 in the amount of \$4,500 to Lenders Choice Mortgage Services, Inc., as fees for processing the loan on the property located at 17501 SW 56<sup>th</sup> Street, Southwest Ranches, Florida.

71. On or about December 31, 2003, defendants HENRY J. QUINTERO and LAZARO VILLALBA caused New World International, Inc., to issue check number 1041 in the amount of \$30,000 payable to defendant MICHELLE VOLCY, drawn on New World International, Inc., account at Bank of America.

72. On or about December 31, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA, and MICHELLE VOLCY caused the mailing of a completed loan application package,

via Federal Express, to Lehman Brothers Federal Savings Bank, 300 Professional Drive, Suite 500, Gaithersburg, MD 20879.

C. Property Located at 15270 SW 53<sup>rd</sup> Court, Southwest Ranches, Florida

73. On or about November 30, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA and ILIANA LIMA prepared and executed, and caused to be prepared and executed, a contract for sale and purchase for the residence located at 15270 SW 53<sup>rd</sup> Court, Southwest Ranches, Florida, for the purchase price of \$725,000.

74. On or about December 1, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA and ILIANA LIMA caused a check to be written in the amount of \$5,000, for deposit on the residence located at 15270 SW 53<sup>rd</sup> Court, Southwest Ranches, Florida.

75. On or about January 5, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA and ERIC GARCIA caused a fraudulent property appraisal to be performed by Pena Appraisal Services, Inc., on the property located at 15270 SW 53<sup>rd</sup> Court, Southwest Ranches, Florida.

76. On or about January 15, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ and ILIANA LIMA prepared and executed a fraudulent mortgage application Form 1003, forwarded to Lenders Choice Mortgage Services Inc., in the name of defendant ILIANA LIMA.

77. On or about January 15, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA and RUBEN JIMENEZ prepared and executed, and caused to be prepared and



executed, a fraudulent Verification of Employment Form 1005 for defendant ILIANA LIMA to be sent to Auto Tractor Inc, 112 SW 5<sup>th</sup> Avenue, Homestead, Florida.

78. On or about January 15, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA and ILIANA LIMA prepared, and caused to be prepared, false and fraudulent bank statements, significantly overstating the amount of money on deposit in defendant ILIANA LIMA's Washington Mutual bank account.

79. On or about January 15, 2004, defendants HENRY J. QUINTERO and LAZARO VILLALBA prepared, and caused to be prepared, false and fraudulent W-2 forms for employment of defendant ILIANA LIMA at Auto Tractor Inc, 112 SW 5<sup>th</sup> Avenue, Homestead, Florida.

80. On or about January 15, 2004, defendants HENRY J. QUINTERO and LAZARO VILLALBA prepared, and caused to be prepared, false and fraudulent pay-stubs for employment of defendant ILIANA LIMA at Auto Tractor Inc, 112 SW 5<sup>th</sup> Avenue, Homestead, Florida.

81. On or about February 27, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ and ILIANA LIMA caused Lehman Brothers Federal Savings Bank in Gaithersburg, MD, to approve a first mortgage loan to defendant ILIANA LIMA in the amount of \$580,000.

82. On or about February 27, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ and ILIANA LIMA caused Lehman Brothers Federal Savings Bank in Gaithersburg, MD, to approve a second mortgage loan to defendant ILIANA LIMA in the amount of \$137,500.

83. On or about February 27, 2004, defendants HENRY J. QUINTERO, LAZARO

VILLALBA, RUBEN JIMENEZ and ILIANA LIMA caused Lehman Brothers Federal Savings Bank to wire transfer \$592,209.85 to D. E. P.A., located in Miami, Florida.

84. On or about February 27, 2004 defendants HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ and ILIANA LIMA caused Lehman Brothers Federal Savings Bank to wire transfer \$140,647.53 to D. E. P.A., located in Miami, Florida.

85. On or about March 1, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ and ILIANA LIMA caused D. E. P.A., to issue check number 11791, in the amount of \$20,075, to Lenders Choice Mortgage Services, Inc., as fees for processing the loan on the property, located at 15270 SW 53<sup>rd</sup> Court, Southwest Ranches, Florida.

86. On or about March 1, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ and ILIANA LIMA caused Florida Title and Escrow to issue check number 11789, in the amount of \$3,609.38, to Lenders Choice Mortgage Services, Inc., as fees for processing the loan on the property located at 15270 SW 53<sup>rd</sup> Court, Southwest Ranches, Florida.

87. On or about March 2, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA and ILIANA LIMA caused the mailing of a completed loan application package, via Airborne Express, to Lehman Brothers Federal Savings Bank, 300 Professional Drive, Suite 500, Gaithersburg, MD 20879.

88. On or about March 30, 2004, defendants HENRY J. QUINTERO and LAZARO VILLALBA caused New World International Inc., to issue check number 1071 for \$10,000 payable to defendant ILIANA LIMA, drawn on New World International, Inc. account at Bank of America.

D. Property Located at 17731 SW 70<sup>th</sup> Place, Southwest Ranches, Florida

89. On or about December 20, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA and MAYKEL CLAVERO prepared and executed, and caused to be prepared and executed, a contract for sale and purchase for the residence located at 17731 SW 70<sup>th</sup> Place, Southwest Ranches, Florida, for the purchase price of \$755,000.

90. On or about January 5, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA and ERIC GARCIA caused a fraudulent property appraisal to be performed by Pena Appraisal Services, Inc., at the property located at 17731 SW 70<sup>th</sup> Place, Southwest Ranches, Florida.

91. On or about January 28, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ and MAYKEL CLAVERO prepared and executed a fraudulent mortgage application Form 1003 forwarded to Lenders Choice Mortgage Service, Inc, in the name of defendant MAYKEL CLAVERO..

92. On or about January 28, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, and RUBEN JIMENEZ prepared and executed, and caused to be prepared and executed, a fraudulent Verification of Employment Form 1005 for defendant MAYKEL CLAVERO to be sent to Millenium Electronics & Communication, 2550 NW 72 Avenue, Suite 313, Miami, Florida.

93. On or about January 28, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA and MAYKEL CLAVERO prepared, and caused to be prepared, false and fraudulent bank statements, significantly overstating the amount of money on deposit in defendant MAYKEL CLAVERO's SunTrust bank account.

94. On or about January 28, 2004, defendants HENRY J. QUINTERO and LAZARO VILLALBA prepared, and caused to be prepared, false and fraudulent W-2 forms for employment of defendant MAYKEL CLAVERO during 2002 and 2003 at Millenium Electronics & Communication, 2550 NW 72 Avenue, Suite 313, Miami, Florida.

95. On or about January 28, 2004, defendants HENRY J. QUINTERO and LAZARO VILLALBA prepared, and caused to be prepared, false and fraudulent pay-stubs for employment of defendant MAYKEL CLAVERO at Millenium Electronics & Communication, 2550 NW 72 Avenue, Suite 313, Miami, Florida.

96. On or about March 19, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA and RUBEN JIMENEZ caused Lenders Choice Services, Inc., Miami, Florida to fax defendant MAYKEL CLAVERO's mortgage application Form 1003 and W-2 from Millenium Electronics & Communication to Aurora Loan Services, 300 Professional Drive, Suite 500, Gaithersburg, MD.

97. On or about March 29, 2004, defendants HENRY J. QUINTERO and LAZARO VILLALBA prepared and executed, and caused to be prepared and executed a document authorizing D. E. P.A., to reduce the property sellers' net sales proceeds by \$97,500 as payment to New World International, Inc., for a finders fee.

98. On or about March 29, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ and MAYKEL CLAVERO caused Lehman Brothers Federal Savings Bank in Gaithersburg, MD, to approve a first mortgage loan to defendant MAYKEL CLAVERO in the amount of \$600,000.

99. On or about March 29, 2004, defendants HENRY J. QUINTERO, LAZARO

VILLALBA, RUBEN JIMENEZ and MAYKEL CLAVERO caused Lehman Brothers Federal Savings Bank in Gaithersburg, MD, to approve a second mortgage loan to defendant MAYKEL CLAVERO in the amount of \$150,000.

100. On or about March 29, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ and MAYKEL CLAVERO caused Lehman Brothers Federal Savings Bank in Gaithersburg, MD, to wire transfer \$611,915.26 to D. E. P.A., in Miami, Florida.

101. On or about March 29, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ and MAYKEL CLAVERO caused Lehman Brothers Federal Savings Bank in Gaithersburg, MD, to wire transfer \$154,044.64 to D. E. P.A., in Miami, Florida.

102. On or about March 29, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA and MAYKEL CLAVERO prepared and executed an agreement whereby New World International, Inc., would pay defendant MAYKEL CLAVERO \$25,000 at closing for qualified services rendered for acquisition of 17731 SW 70<sup>th</sup> Place, Southwest Ranches, Florida.

103. On or about March 31, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA and MAYKEL CLAVERO caused the mailing of a completed loan application package, via Federal Express, to Lehman Brothers Federal Savings Bank, 300 Professional Drive, Suite 500, Gaithersburg, MD 20879.

104. On or about April 1, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ and MAYKEL CLAVERO caused D. E. P.A., to issue check number 12310, in the amount of \$19,980, to Lenders Choice Mortgage Services, Inc., as fees for processing the loan on the property located at 17731 SW 70<sup>th</sup> Place, Southwest Ranches, Florida.

105. On or about April 1, 2004, defendants HENRY J. QUINTERO, LAZARO

VILLALBA, RUBEN JIMENEZ and MAYKEL CLAVERO caused D. E. P.A., to issue check number 12307, in the amount of \$4,500, to Lenders Choice Mortgage Services, Inc., as fees for processing the loan on the property located at 17731 SW 70<sup>th</sup> Place, Southwest Ranches, Florida.

106. On or about April 6, 2004, defendants HENRY J. QUINTERO and LAZARO VILLALBA caused New World International, Inc., to issue check number 1070 for \$25,000, drawn on New World International, Inc., account at Bank of America to defendant MAYKEL CLAVERO.

E. Property Located at 6310 SW 185<sup>th</sup> Way, Southwest Ranches, Florida

107. On or about March 17, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA and NIDIA RODRIGUEZ prepared and executed, and caused to be prepared and executed, a contract for sale and purchase for the residence located at 6310 SW 185<sup>th</sup> Way, Southwest Ranches, Florida, for the purchase price of \$850,000.

108. On or about April 5, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA and MARTINE YANISSE CASTRILLON caused a fraudulent property appraisal to be performed by Appraisal By Design, 1198 Venetian Way #207, Miami Beach, Florida, on the property located at 6310 SW 185 Way, Southwest Ranches, Florida.

109. On or about April 14, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ and NIDIA RODRIGUEZ prepared and executed a fraudulent mortgage application Form 1003, forwarded to Lenders Choice Mortgage Service, Inc. in the name of defendant NIDIA RODRIGUEZ.

110. On or about April 14, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, and RUBEN JIMENEZ prepared and executed, and caused to be prepared and executed, a fraudulent Verification of Employment Form 1005 for defendant NIDIA RODRIGUEZ

to be sent to Eastwood Enterprises, 7875 NW 29 Street, Miami, Florida.

111. On or about April 14, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, and NIDIA RODRIGUEZ prepared, and caused to be prepared, false and fraudulent bank statements, significantly overstating the amount of money on deposit in defendant NIDIA RODRIGUEZ's Bank of America bank account.

112. On or about April 14, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA and JOAQUIN M. PEREA prepared, and caused to be prepared, false and fraudulent W-2 forms for employment of defendant NIDIA RODRIGUEZ at Eastwood Enterprises, 7875 NW 29 Street, Miami, Florida.

113. On or about April 14, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA and JOAQUIN M. PEREA prepared, and caused to be prepared, false and fraudulent pay-stubs for employment of defendant NIDIA RODRIGUEZ at Eastwood Enterprises, 7875 NW 29 Street, Miami, Florida.

114. On or about May, 14, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA and RUBEN JIMENEZ prepared and executed, and caused to be prepared and executed, a verification of rent for defendant NIDIA RODRIGUEZ from C.A. claiming RODRIGUEZ paid \$1,800 per month in rent at 14150 SW 84 Street, Miami, Florida.

115. On or about June 24, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ and NIDIA RODRIGUEZ caused a fax representing false and fraudulent Bank of America statements for defendant NIDIA RODRIGUEZ to be sent from Lenders Choice Mortgage Services in Miami, Florida to WMC Mortgage Corporation in Addison, Texas.

116. On or about July 1, 2004, defendants HENRY J. QUINTERO, LAZARO

VILLALBA, RUBEN JIMENEZ and NIDIA RODRIGUEZ caused the mailing of a completed loan application package, from Lender's Choice Mortgage Service in Miami, Florida, via Federal Express, to WMC Mortgage Corporation, 15305 N. Dallas Parkway #500, Addison, TX 75001.

117. On or about July 1, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ and NIDIA RODRIGUEZ prepared and executed and caused to be prepared and executed a document authorizing D. E. P.A., to reduce the seller's net sales proceeds and pay D & H Investments of South Florida, Inc., \$75,000.

118. On or about July 1, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ and NIDIA RODRIGUEZ caused WMC Mortgage Corporation in Woodland Hills, CA, to approve first mortgage loan to defendant NIDIA RODRIGUEZ in the amount of \$700,000.

119. On or about July 1, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ and NIDIA RODRIGUEZ caused WMC Mortgage Corporation in Woodland Hills, CA, to approve a second mortgage loan to defendant NIDIA RODRIGUEZ in the amount of \$150,000.

120. On or about July 2, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ and NIDIA RODRIGUEZ caused WMC Mortgage Corporation to wire transfer \$705,728.67 to D. E. P.A., in Miami, Florida.

121. On or about July 2, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ and NIDIA RODRIGUEZ caused WMC Mortgage Corporation to wire transfer \$148,244.18 to D. E. P.A., in Miami, Florida.

122. On or about July 2, 2004, defendants HENRY J. QUINTERO, LAZARO



VILLALBA, RUBEN JIMENEZ and NIDIA RODRIGUEZ caused D. E. P.A., to issue check number 1998, in the amount of \$21,805, to Lenders Choice Mortgage Services, Inc., as fees for processing the loan on the property located at 6310 SW 185 Way, Southwest Ranches, Florida.

123. On or about July 6, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, and DAHOMEY TALAVERA caused D & H Investments, Inc. to issue check number 1188, in the amount of \$25,000, drawn on D & H Investments, Inc. account, at Washington Mutual Bank to defendant RUBEN JIMENEZ.

124. On or about July 13, 2004, defendants HENRY J. QUINTERO and LAZARO VILLALBA and RUBEN JIMENEZ caused the withdrawal of \$10,000 from defendant JIMENEZ' South Trust bank account, and the purchase of a \$10,000 cashier's check payable to defendant NIDIA RODRIGUEZ.

F. Property located at 18330 SW 66<sup>th</sup> Street, Southwest Ranches, Florida

125. On or about July 12, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, and LUC BRUNA prepared and executed, and caused to be prepared and executed and executed, a contract for sale and purchase for the residence located at 18330 SW 66<sup>th</sup> Street, Southwest Ranches, Florida, for the purchase price of \$700,000.

126. On or about July 13, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA and LUC BRUNA prepared and executed, and caused to be prepared and executed, an addendum to the contract for sale, whereby the seller agreed to pay defendant LUC BRUNA \$87,500 at closing for improvements to 18330 SW 66<sup>th</sup> Street, Southwest Ranches, Florida.

127. On or about July 26, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA and MARTINE YANISSE CASTRILLON caused a fraudulent property appraisal to be

performed by Appraisal By Design, 1198 Venetian Way, #207, Miami Beach, Florida, on the property located at 18330 SW 66<sup>th</sup> Street, Southwest Ranches, Florida.

128. On or about August 5, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA and JOAQUIN M. PEREA prepared and executed, and caused to be prepared and executed, a fraudulent letter claiming defendant LUC BRUNA received a bonus from his employer Maddux and Company, 7280 SW 39<sup>th</sup> Terrace, Miami, Florida.

129. On or about August 11, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO RAMOS and LUC BRUNA prepared and executed a fraudulent mortgage application Form 1003, forwarded to Home Mortgage Finance Group Corp., in the name of defendant LUC BRUNA.

130. On or about August 11, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA and JOAQUIN M. PEREA prepared, and caused to be prepared, false and fraudulent W-2 forms, for employment of defendant LUC BRUNA, at Maddux and Company, 7250 SW 39<sup>th</sup> Terrace, Miami, Florida.

131. On or about August 11, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA and JOAQUIN M. PEREA prepared, and caused to be prepared, false and fraudulent pay-stubs, for employment of defendant LUC BRUNA at Maddux and Company, 7250 SW 39<sup>th</sup> Terrace, Miami, Florida.

132. On or about August 11, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO C. RAMOS and LUC BRUNA caused First Franklin Financial Corporation in San Jose, CA to approve a first mortgage loan to defendant LUC BRUNA in the amount of \$560,000.

133. On or about August 11, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO C. RAMOS and LUC BRUNA caused First Franklin Financial Corporation in San Jose, CA, to approve a second mortgage loan to defendant LUC BRUNA in the amount of \$140,000.

134. On or about August 11, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO C. RAMOS and LUC BRUNA caused First Franklin Financial Corporation to wire transfer from Indianapolis, IN, \$567,745.66 to Barrister Title, located in Plantation, Florida.

135. On or about August 11, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO C. RAMOS and LUC BRUNA caused First Franklin Financial Corporation to wire transfer from Indianapolis, IN, \$138,956.62 to Barrister Title, located in Plantation, Florida.

136. On August 11, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO C. RAMOS and LUC BRUNA caused Barrister Title to disburse \$87,500 of the loan proceeds to New World International, Inc.

137. On or about August 12, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO C. RAMOS and LUC BRUNA caused Barrister Title to issue check number 1036 in the amount of \$19,660 to Home Mortgage Finance Group Corp., as fees for processing the loan on the property located at 18330 SW 66th Street, Southwest Ranches, Florida.

138. On or about August 17, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, and LUC BRUNA caused New World Investments, Inc., to issue check number 1098 for \$15,000 drawn on New World Investments, Inc., account at Bank of America to defendant LUC BRUNA.

G.. Property located at 5109 SW 164<sup>th</sup> Terrace, Southwest Ranches, Florida

139. On or about August 24, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA and FELIPE M. NUNEZ prepared and executed, and caused to be prepared and executed, a contract for sale and purchase for the residence located at 5109 SW 164<sup>th</sup> Terrace, Southwest Ranches, Florida, for the purchase price of \$725,000 less a \$75,000 credit to defendant FELIPE M. NUNEZ at closing for improvements to 5109 SW 164<sup>th</sup> Terrace, Southwest Ranches, Florida.

140. On or about September 8, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA and MARTINE YANISSE CASTRILLON caused a fraudulent property appraisal to be performed by Appraisal By Design, 1198 Venetian Way #207, Miami Beach, Florida, on the property located at 5109 SW 164<sup>th</sup> Terrace, Southwest Ranches, Florida.

141. On or about September 11, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA and JOAQUIN M. PEREA prepared, and caused to be prepared, false and fraudulent W-2 forms, for employment of defendant FELIPE M. NUNEZ, at Maddux and Company, 7250 SW 39 Terrace, Miami, Florida.

142. On or about September 11, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA and JOAQUIN M. PEREA prepared, and caused to be prepared, false and fraudulent pay-stubs, for employment of FELIPE M. NUNEZ at Maddux and Company, 7250 SW 39 Terrace, Miami, Florida.

143. On or about September 12, 2003, defendants HENRY J. QUINTERO, LAZARO VILLALBA and ANTONIO C. RAMOS prepared and executed a fraudulent mortgage application Form 1003, forwarded to Home Mortgage Finance Group Corp., in the name of defendant FELIPE M. NUNEZ.

144. On or about October 5, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO C. RAMOS and FELIPE M. NUNEZ caused Master Financial, Inc., in Orange, CA, to approve a first mortgage loan to defendant FELIPE M. NUNEZ in the amount of \$625,000.

145. On or about October 5, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO C. RAMOS and FELIPE M. NUNEZ caused Master Financial, Inc., in Orange, CA, to approve a second mortgage loan to defendant FELIPE M. NUNEZ in the amount of \$100,000.

146. On or about October 5, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO C. RAMOS and FELIPE M. NUNEZ caused Master Financial, Inc., in Orange, CA, to wire transfer \$634,108.68 to Barrister Title, located in Plantation, Florida.

147. On or about October 5, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO C. RAMOS and FELIPE M. NUNEZ caused Master Financial, Inc., in Orange, CA, to wire transfer \$99,986.11 to Barrister Title, located in Plantation, Florida.

148. On or about October 5, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO C. RAMOS and FELIPE M. NUNEZ caused Barrister Title to issue check number 1193 in the amount of \$15,375 to Home Mortgage Finance Group Corp., as fees for processing the loan on the property located at 5109 SW 164th Terrace, Southwest Ranches, Florida.

149. On October 6, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO C. RAMOS and FELIPE M. NUNEZ caused Barrister Title to disburse \$22,778.13 required for defendant FELIPE M. NUNEZ' closing costs, from the \$75,000 loan proceeds designated to New World International, Inc.

150. On October 7, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO C. RAMOS and FELIPE M. NUNEZ caused Barrister Title to disburse \$52,221.87 of the remaining balance from the authorized \$75,000 of the loan proceeds to New World International, Inc.

151. On or about October 8, 2004, defendants HENRY J. QUINTERO and LAZARO VILLALBA caused New World International, Inc., to withdraw \$10,000 and purchase a cashier's check from the New World International account at Bank of America, payable to defendant FELIPE M. NUNEZ.

152. On or about October 8, 2004, defendants HENRY J. QUINTERO and LAZARO VILLALBA caused New World International, Inc., to withdraw \$6,000 and purchase a cashier's check from the New World International account at Bank of America, payable to defendant ANTONIO RAMOS.

H. Property Located at 20251 SW 50<sup>th</sup> Place, Southwest Ranches

153. On or about September 23, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA and FELIPE M. NUNEZ prepared and executed, and caused to be prepared and executed, a contract for sale and purchase, for the residence located at 20251 SW 50<sup>th</sup> Place, Southwest Ranches, Florida, for the purchase price of \$600,000.

154. On or about September 23, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA and FELIPE M. NUNEZ caused a check to be written in the amount of \$1,000, for deposit on the residence located at 20251 SW 50<sup>th</sup> Place, Southwest Ranches, Florida.

155. On or about September 24, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO RAMOS and FELIPE M. NUNEZ prepared and executed a fraudulent

mortgage application Form 1003 forwarded to Home Mortgage Finance Group Corp., in the name of defendant FELIPE M. NUNEZ..

156. On or about September 24, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO C. RAMOS and JOAQUIN M. PEREA prepared, and caused to be prepared, false and fraudulent W-2 forms, for employment of defendant FELIPE M. NUNEZ, at Maddux and Company, 7250 SW 39<sup>th</sup> Terrace, Miami, Florida.

157. On or about September 24, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO C. RAMOS and JOAQUIN M. PEREA prepared, and caused to be prepared, false and fraudulent pay-stubs, for employment of defendant FELIPE M. NUNEZ at Maddux and Company, 7250 SW 39<sup>th</sup> Terrace, Miami, Florida.

158. On or about September 27, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA and ANTONIO C. RAMOS prepared and executed, and caused to be prepared and executed, a fraudulent verification of rent for defendant FELIPE M. NUNEZ from Cutler Vista Apartments, claiming defendant NUNEZ paid \$3,000 per month in rent at 13552 SW 65<sup>th</sup> Lane, Miami, Florida.

159. On or about October 6, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA and FELIPE M. NUNEZ caused a check to be written in the amount of \$4,000, for an additional deposit on the residence located at 20251 SW 50<sup>th</sup> Place, Southwest Ranches, Florida.

160. On or about October 8, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO RAMOS, and FELIPE M. NUNEZ prepared and executed, and caused to be prepared and executed, a fraudulent verification of deposit from Washington Mutual claiming defendant FELIPE M. NUNEZ had a bank account balance of \$56,154.26 as of October 8, 2004.

161. On or about October 21, 2004, defendants HENRY J. QUINTERO, LAZARO

VILLALBA, ANTONIO C. RAMOS and FELIPE M. NUNEZ caused New Century Mortgage, Inc., in Irvine, California, to approve a first mortgage loan to defendant FELIPE M. NUNEZ in the amount of \$480,000.

162. On or about October 21, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO C. RAMOS and FELIPE M. NUNEZ caused New Century Mortgage, in Irvine, California, to approve a second mortgage loan to defendant FELIPE M. NUNEZ in the amount of \$120,000.

163. On or about October 21, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO C. RAMOS and FELIPE M. NUNEZ and co-conspirators caused New Century Mortgage, Inc., in Irvine, CA, to wire transfer \$487,868.78 to Barrister Title, located in Plantation, Florida.

164. On or about October 21, 2004, defendant HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO C. RAMOS and FELIPE M. NUNEZ caused New Century Mortgage, Inc., in Irvine, CA, to wire transfer \$119,410.10 to Barrister Title, located in Plantation, Florida.

165. On October 21, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO C. RAMOS and FELIPE M. NUNEZ caused Barrister Title to disburse \$75,000 of the loan proceeds to New World International, Inc.

166. On or about October 22, 2004, defendants HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO C. RAMOS and FELIPE M. NUNEZ caused Barrister Title to issue check number 1219, in the amount of \$14,400, to Home Mortgage Finance Group Corp., as fees for processing the loan on the property located at 20251 SW 50<sup>th</sup> Place, Southwest Ranches, Florida.

167. On or about October 22, 2004, defendants HENRY J. QUINTERO and LAZARO VILLALBA caused New World International, Inc., to withdraw \$10,000, and purchase a cashier's



check from the New World International account at Bank of America, payable to defendant FELIPE M. NUNEZ.

168. On or about October 22, 2004, defendants HENRY J. QUINTERO and LAZARO VILLALBA caused New World International, Inc., to withdraw \$6,000, and purchase a cashier's check from the New World International account at Bank of America, payable to defendant ANTONIO RAMOS.

All in violation of Title 18, United States Code, Section 1349.

**COUNTS 2-9**

**Bank Fraud**

**(18 U.S.C. §§1344 and 2)**

169. Paragraphs 1 through 21 of the General Allegations Section of this indictment are realleged and incorporated fully herein by reference.

170. From on or about August 2, 2003, and continuing through on or about August 24, 2005, in Broward and Miami-Dade Counties, in the Southern District of Florida and elsewhere, the defendants,

HENRY J. QUINTERO-LOPEZ,  
a/k/a Henry J. Quintero,  
LAZARÓ VILLALBA,  
DAHOMEY TALAVERA,  
RUBEN JIMENEZ,  
RAUL ERIC GARCIA,  
a/k/a Eric Garcia  
IRAY PONTE,  
MICHELLE VOLCY,  
ILIANA LIMA,  
and  
MAYKEL CLAVERO-GONZALEZ,

a/k/a Maykel Clavero,

did knowingly and willfully devise a scheme and artifice to defraud a federally insured finance institution, that is; Lehman Brothers Federal Savings Bank, and to obtain monies and find owners, by and under the care, custody and control of said financial institution by means of materially false and fraudulent pretenses, representations and promises.

Purpose of the Scheme and Artifice

171. It was the purpose of the scheme and artifice for the defendants to unlawfully enrich themselves by: (a) finding properties for sale wherein the owner / seller would be willing to overstate the contract price; (b) submitting false and fraudulent mortgage loan applications and related documents to banks and other lending institutions, thereby inducing the banks and other lending institutions to make loans to straw buyer purchasers; (c) concealing the submissions of the false and fraudulent applications and documents and the receipt and transfer of fraud proceeds, and (d) diverting fraud proceeds for their personal use and benefit.

Manner and Means of the Scheme and Artifice

172. Paragraphs 25 through 31 of the Manner and Means Section of Count I of this indictment are realleged and incorporated by reference as a description of the Manner and Means of the Scheme and Artifice.

Execution of the Scheme and Artifice

173. On or about the dates specified as to each count below, in the Southern District of Florida, and elsewhere, Defendants HENRY J. QUINTERO, LAZARO VILLALBA, ERIC GARCIA, MICHELLE VOLCY, IRAY PONTE and ILIANA LIMA, did knowingly and willfully execute the above described scheme and artifice to defraud and to obtain monies and funds

owned by and under the custody and control of Lehman Brother's Federal Savings Bank, as described below:

Count	Defendant	Date	Description of Fraudulent Activities
2	HENRY J. QUINTERO , LAZARO VILLALBA, DAHOMY TALAVERA, RUBEN JIMENEZ, ERIC GARCIA and IRAY PONTE	October 29, 2003	Obtaining mortgage loan proceeds in the amount of \$637,667.66 from Lehman Brothers Federal Savings Bank for the purchase of property located at 6402 SW 185 <sup>th</sup> Way, Southwest Ranches, Florida, based on the submission of materially false and fraudulent documents
3	HENRY J. QUINTERO, LAZARO VILLALBA, DAHOMY TALAVERA, RUBEN JIMENEZ, ERIC GARCIA and IRAY PONTE	October 29, 2003	Obtaining mortgage loan proceeds in the amount of \$152,740.77 from Lehman Brothers Federal Savings Bank for the purchase of property located at 6402 SW 185 <sup>th</sup> Way, Southwest Ranches, Florida, based on the submission of materially false and fraudulent documents
4	HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ, ERIC GARCIA, and MICHELLE VOLCY	December 29, 2003	Obtaining mortgage loan proceeds in the amount of \$609,840.01 from Lehman Brothers Federal Savings Bank for the purchase of property located at 17501 SW 56 <sup>th</sup> Street, Southwest Ranches, Florida, based on the submission of materially false and fraudulent documents

Count	Defendant	Date	Description of Fraudulent Activities
5	HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ, ERIC GARCIA and MICHELLE VOLCY	December 29, 2003	Obtaining mortgage loan proceeds in the amount of \$152,334.81 from Lehman Brothers Federal Savings Bank for the purchase of property located at 17501 SW 56 <sup>th</sup> Street, Southwest Ranches, Florida, based on the submission of materially false and fraudulent documents
6	HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ, ERIC GARCIA and ILIANA LIMA	February 27, 2004	Obtaining mortgage loan proceeds in the amount of \$592,209.85 from Lehman Brothers Federal Savings Bank for the purchase of property located at 15270 SW 53 <sup>rd</sup> Court, Southwest Ranches, Florida, based on the submission of materially false and fraudulent documents
7	HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ, ERIC GARCIA and ILIANA LIMA	February 27, 2004	Obtaining mortgage loan proceeds in the amount of \$140,647.53 from Lehman Brothers Federal Savings Bank for the purchase of property located at <del>17501 SW 56<sup>th</sup> Street</del> 15270 SW 53 <sup>rd</sup> Court, Southwest Ranches, Florida, based on the submission of materially false and fraudulent documents. <i>(RHC)</i>

Count	Defendant	Date	Description of Fraudulent Activities
8	HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ, ERIC GARCIA and MAYKEL CLAVERO	March 29, 2004	Obtaining mortgage loan proceeds in the amount of \$611,915.26 from Lehman Brothers Federal Savings Bank for the purchase of property located at 17731 SW 70 <sup>th</sup> Place, Southwest Ranches, Florida, based on the submission of materially false and fraudulent documents.
9	HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ, ERIC GARCIA and MAYKEL CLAVERO	March 29, 2004	Obtaining mortgage loan proceeds in the amount of \$154,044.64 from Lehman Brothers Federal Savings Bank for the purchase of property located at 17731 SW 70 <sup>th</sup> Place, Southwest Ranches, Florida, based on the submission of materially false and fraudulent documents.

All in violation of Title 18 , United States Code, Sections 1344 and 2.

**COUNTS 10-25**

**Wire Fraud**

**(18 U.S.C. §§1343 and 2)**

The allegations in paragraphs 1 through 21 and paragraphs 23 through 168, of this Indictment are realleged and incorporated by reference as though fully set forth herein.

174. On or about the dates enumerated as to each count, at Broward and Miami-Dade Counties in the Southern District of Florida, and elsewhere, for the purpose of executing and in furtherance of the scheme and artifice to defraud and for obtaining money by means of false and

fraudulent pretenses, representations, and promises, the defendants enumerated as to each count, did knowingly and willfully cause to be transmitted in interstate commerce by means of wire communication certain signals and sounds, as more particularly described in each count below:

Count	Defendants	Approximate Date of Wire	Description of Wire Communications
10	HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ, JOAQUIN M. PEREA	June 4, 2004	Lenders Choice, Miami, Florida, facsimile of pay stub for Nidia Rodriguez showing employment at Eastwood Enterprises to WMC Mortgage, Woodland Hills, California.
11	HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ, JOAQUIN M. PEREA	June 4, 2004	Lenders Choice, Miami, Florida, facsimile of Forms W-2 Wage and Tax Statement for Nidia Rodriguez showing employment at Eastwood Enterprises to WMC Mortgage, Woodland Hills, California.
12	HENRY J. QUINTERO, LAZARO VILLALBA, DAHOMY TALAVERA, RUBEN JIMENEZ JOAQUIN M. PEREA, NIDIA RODRIGUEZ MARTINE YANISSE CASTRILLON	July 1, 2004	Wire transfer in the amount of \$705,728.67 from WMC Mortgage Woodland Hills, California to Ocean Bank account number 060621346405 in the name of D. E. P.A., Miami, Florida.
13	HENRY J. QUINTERO, LAZARO VILLALBA, DAHOMY TALAVERA, JOAQUIN M. PEREA RUBEN JIMENEZ, NIDIA RODRIGUEZ MARTINE YANISSE CASTRILLON	July 1, 2004	Wire transfer in the amount of \$148,244.18 from WMC Mortgage Woodland Hills, California to Ocean Bank account number 060621346405 in the name of D. E. P.A., Miami, Florida.

Count	Defendants	Approximate Date of Wire	Description of Wire Communications
14	HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO RAMOS	August 9, 2004	Home Mortgage Finance Group, Miami, Florida, facsimile of letter dated August 9, 2004 stating Luc Bruna received a bonus from Maddux and Company to First Franklin Financial San Jose, California.
15	HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO RAMOS	August 11, 2004	Home Mortgage Finance Group, Miami, Florida, facsimile of Uniform Residential Loan Application Form 1003 for Luc Bruna to First Franklin Financial San Jose, California.
16	HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO RAMOS, JOAQUIN M. PEREA, LUC BRUNA MARTINE YANISSE CASTRILLON	August 11, 2004	Wire transfer in the amount of \$567,745.66 from First Franklin, Indianapolis, Indiana to Regent Bank account number 010203483206 in the name of H. L. R. / Barrister Title Services of Weston, in Weston, Florida.
17	HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO RAMOS JOAQUIN M. PEREA, LUC BRUNA MARTINE YANISSE CASTRILLON	August 11, 2004	Wire transfer in the amount of \$138,956.62 from First Franklin, Indianapolis, Indiana to Regent Bank account number 010203483206 in the name of H. L. R. / Barrister Title Services of Weston, in Weston, Florida.
18	HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO RAMOS, JOAQUIN M. PEREA FELIPE M. NUNEZ	September 11, 2004	Home Mortgage Finance Group, Miami, Florida, facsimile of Form W-2 Wage and Tax Statements for FELIPE M. NUNEZ to Master Financial in Orange, California..

Count	Defendants	Approximate Date of Wire	Description of Wire Communications
19	HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO RAMOS, FELIPE M. NUNEZ	October 1, 2004	Home Mortgage Finance Group, Miami, Florida, facsimile of Uniform Residential Loan Application Form 1003 for FELIPE M. NUNEZ to Master Financial in Orange, California.
20	HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO RAMOS JOAQUIN M. PEREA FELIPE M. NUNEZ MARTINE YANISSE CASTRILLON	October 5, 2004	Wire transfer in the amount of \$634,108.68 from Master Financial in Orange, California to Regent Bank account number 010203483206 in the name of H. L. R. / Barrister Title Services of Weston, in Weston, Florida.
21	HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO RAMOS JOAQUIN M. PEREA FELIPE M. NUNEZ MARTINE YANISSE CASTRILLON	October 5, 2004	Wire transfer in the amount of \$99,986.11 from Master Financial in Orange, California to Regent Bank account number 010203483206 in the name of H. L. R. / Barrister Title Services of Weston, in Weston, Florida.
22	HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO RAMOS FELIPE M. NUNEZ	October 8, 2004	Home Mortgage Finance Group, Miami, Florida, facsimile of Verification of Deposit claiming FELIPE M. NUNEZ had a \$59,562.41 balance in a Washington Mutual account to New Century Financial Corporation in Irvine, California.



Count	Defendants	Approximate Date of Wire	Description of Wire Communications
23	HENRY J. QUINTERO, LAZARO VILLALBA, JOAQUIN M. PEREA ANTONIO RAMOS FELIPE M. NUNEZ	October 13, 2004	Home Mortgage Finance Group, Miami, Florida, facsimile of Maddux and Company pay stub for FELIPE M. NUNEZ to New Century Financial Corporation in Irvine, California.
24	HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO RAMOS, JOAQUIN M. PEREA, FELIPE M. NUNEZ	October 21, 2004	Wire transfer in the amount of \$487,868.78 from New Century Financial Corporation in Irvine California to Regent Bank account number 010203483206 in the name of H. L. R / Barrister Title Services of Weston, in Weston, Florida.
25	HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO RAMOS, JOAQUIN M. PEREZ, FELIPE M. NUNEZ	October 21, 2004	Wire transfer in the amount of \$119,410.10 from New Century Financial Corporation in Irvine California to Regent Bank account number 010203483206 in the name of H. L. R / Barrister Title Services of Weston, in Weston, Florida.

All in violation of Title 18, United States Code, Section 1343 and 2.

**COUNT 26**

**Money Laundering Conspiracy**

**(18 U.S.C. §1956h)**

175. From in or about August 2003, the exact date being unknown to the grand jury, and continuing through on or about April 25, 2007, in Broward and Miami-Dade counties, in the Southern District of Florida and elsewhere, defendants,

HENRY J. QUINTERO-LOPEZ,  
a/k/a Henry J. Quintero  
LAZARO VILLALBA,  
DAHOMEY TALAVERA,  
RUBEN JIMENEZ,  
ANTONIO C. RAMOS,  
FELIPE M. NUNEZ,  
MICHELLE VOLCY,  
LUC BRUNA,  
MAYKEL CLAVERO,  
IRAY PONTE,  
NIDIA RODRIGUEZ-RIAL,  
a/k/a/ Nidia Rodriguez  
and  
ILIANA LIMA,

knowingly conspired and agreed with each other and with others known and unknown to the grand jury to: knowingly conduct and attempt to conduct financial transactions, as set forth in Counts 27 through 70 of this Indictment, which transactions affected interstate commerce, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, the financial transactions, in fact, representing the proceeds of specified unlawful activity, to wit, bank fraud, in violation of Title 18, United States Code, Section 1344, as alleged in Counts 2 through 9 of this Indictment, and wire fraud, in violation of Title 18, United States Code, Section 1343, as alleged in Counts 10 through 25 of this Indictment, and with the intent to promote the carrying on of such specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i) and 2.

All in violation of Title 18, United States Code, Section 1956(h).

**COUNTS THROUGH 27 -70**

**(Money Laundering: 18 U.S.C. § 1956(a)(1)(A)(i))**

176. The allegations in paragraphs 1 through 175 of this Indictment are realleged as if fully set forth herein.

177. On or about the dates specified below, in Broward and Miami-Dade Counties, in the Southern District of Florida and elsewhere, the defendants, as enumerated to each count below, did knowingly conduct and attempt to conduct the financial transactions set forth below, which transactions affected interstate commerce, and which transactions involved the proceeds of specified unlawful activity, that is, bank fraud, in violation of Title 18, United States Code, Section 1344, as alleged in Counts 2 through 9 of this Indictment, and wire fraud, in violation of Title 18, United States Code, Section 1343, as alleged in Counts 10 through 25 of this Indictment, and with the intent to promote the carrying on of such unlawful activity, and while conducting and attempting to conduct such financial transactions, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity;

<b>COUNT</b>	<b>DEFENDANT</b>	<b>APPROXIMATE DATE OF FINANCIAL TRANSACTION</b>	<b>DESCRIPTION OF FINANCIAL TRANSACTION</b>
27	HENRY J. QUINTERO, LAZARO VILLALBA DAHOMY TALAVERA RUBEN JIMENEZ IRAY PONTE	10/30/2003  -	Deposit of check number 8433 drawn on SunTrust account number 0285001029318 in the name of Florida Title & Escrow made payable to D & H Investments of South Florida Inc., for \$19,594.18

COUNT	DEFENDANT	APPROXIMATE DATE OF FINANCIAL TRANSACTION	DESCRIPTION OF FINANGIAL TRANSACTION
28	HENRY J. QUINTERO, LAZARO VILLALBA, DAHOMY TALAVERA, RUBEN JIMENEZ, IRAY PONTE	10/30/2003	Deposit of check number 9036 drawn on SunTrust account number 0285001029318 in the name of Florida Title & Escrow made payable to Lenders Choice Mortgage Services Inc., for \$31,980
29	HENRY J. QUINTERO, LAZARO VILLALBA, DAHOMY TALAVERA, RUBEN JIMENEZ, IRAY PONTE	10/30/2003	Deposit of Check number 9046 drawn on SunTrust account number 0285001029318 in the name of Florida Title & Escrow made payable to Lenders Choice Mortgage Services Inc., for \$8,082.50
30	HENRY J. QUINTERO, LAZARO VILLALBA, DAHOMY TALAVERA, IRAY PONTE, RUBEN JIMENEZ	10/31/2003	Deposit of check number 8382 drawn on Ocean Bank account number 060617324105 in the name of Lenders Choice Mortgage Services made payable to D & H Investments of South Florida Inc., for \$14,000
31	HENRY J. QUINTERO, LAZARO VILLALBA DAHOMY TALAVERA RUBEN JIMENEZ IRAY PONTE	11/11/2003	Deposit of check number 1036 drawn on Washington Mutual Bank account number 0922947249 in the name of D & H Investments of South Florida Inc. made payable to Iray Ponte for \$20,000

COUNT	DEFENDANT	APPROXIMATE DATE OF FINANCIAL TRANSACTION	DESCRIPTION OF FINANCIAL TRANSACTION
32	HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ, MICHELLE VOLCY	12/29/2003	Deposit of check number 9769 drawn on SunTrust account number 0285001029318 in the name of Florida Title & Escrow made payable to Lenders Choice Mortgage Services Inc., for \$4,500
33	HENRY J. QUINTERO, LAZARO VILLALBA, MICHELLE VOLCY, RUBEN JIMENEZ	12/29/2003	Deposit of check number 9767 drawn on SunTrust account number 0285001029318 in the name of Florida Title & Escrow made payable to Lenders Choice Mortgage Services Inc., for \$20,480
34	HENRY J. QUINTERO, LAZARO VILLALBA, MICHELLE VOLCY, RUBEN JIMENEZ	12/31/2003	Wire transfer from account number 0285001029318 in the name of Florida Title & Escrow for \$100,000 to Bank of America account number 003446957219 in the name of New World International Inc.
35	HENRY J. QUINTERO, LAZARO VILLALBA, DAHOMY TALAVERA, RUBEN JIMENEZ, MICHELLE VOLCY	12/31/2003	Wire transfer from account number 003446957219 in the name of New World International Inc for \$20,631.50 to Washington Mutual Bank account number 0922947249 in the name of D & H Investments South Florida Inc.

COUNT	DEFENDANT	APPROXIMATE DATE OF FINANCIAL TRANSACTION	DESCRIPTION OF FINANCIAL TRANSACTION
36	HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ, MICHELLE VOLCY	12/31/2003	Deposit of check number 1041 drawn on account number 003446957219 in the name of New World International Inc., made payable to MICHELLE VOLCY for \$30,000
37	HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ, MICHELLE VOLCY	12/31/2003	Withdrawal of \$28,737.24 from Bank of America account number 003446957219 in the name of New World International Inc for the purchase of Bank of America cashier's check number 3192699 for \$28,737.24 made payable to Florida Title & Escrow
38	HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ, MAYKEL CLAVERO	03/29/2004	Deposit of check number 12189 drawn on Ocean Bank account number 060621346405 in the name of D. E. P. A.. made payable to New World International Inc., for \$97,500
39	HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ, MAYKEL CLAVERO, ILIANA LIMA	03/30/2004	Deposit of check number 1071 drawn on Bank of America account number 003446957219 in the name of New World Investments Inc., made payable to ILIANA LIMA for \$10,000

COUNT	DEFENDANT	APPROXIMATE DATE OF FINANCIAL TRANSACTION	DESCRIPTION OF FINANCIAL TRANSACTION
40	HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ, MAYKEL CLAVERO	04/01/2004	Deposit of check number 12310 drawn on Ocean Bank account number 060621346405 in the name of D. E. P.A.. made payable to Lenders Choice Mortgage Services Inc., for \$19,980
41	HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ, MAYKEL CLAVERO	04/01/2004	Deposit of check number 12307 drawn on Ocean Bank account number 060621346405 in the name of D. E. P.A. made payable to Lenders Choice Mortgage Services Inc., for \$4,500
42	HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ, MAYKEL CLAVERO	04/01/2004	Wire transfer of \$28,100 from Bank of America account number 003446957219 in the name of New World International Inc to SunTrust account number 0798002521831 in the name of MAYKEL CLAVERO
43	HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ, MAYKEL CLAVERO	04/01/2004	Withdrawal of \$28,100 from SunTrust account number 0798002521831 in the name of MAYKEL CLAVERO for the purchase of SunTrust cashier's check #0234245475 for \$28,100 made payable to D. E. P.A.

COUNT	DEFENDANT	APPROXIMATE DATE OF FINANCIAL TRANSACTION	DESCRIPTION OF FINANCIAL TRANSACTION
44	HENRY J. QUINTERO, LAZARO VILLALBA, DAHOMY TALAVERA, RUBEN JIMENEZ, MAYKEL CLAVERO	04/05/2004	Wire transfer of \$11,590 from Bank of America account number 003446957219 in the name of New World Investments Inc to Washington Mutual Bank account number 0922947249 in the name of D & H Investments of South Florida Inc.
45	HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ, MAYKEL CLAVERO	04/07/2004	Deposit of check number 1070 drawn on Bank of America account number 003446957219 in the name of New World Investments Inc., made payable to MAYKEL CLAVERO for \$25,000
46	HENRY J. QUINTERO, LAZARO VILLALBA, RUBEN JIMENEZ, NIDIA RODRIGUEZ	07/02/2004	Deposit of check number 1998 drawn on Ocean Bank account number 060621346405 in the name of D. E. P.A.. made payable to Lenders Choice Mortgage Services Inc., for \$21,805
47	HENRY J. QUINTERO, LAZARO VILLALBA, DAHOMY TALAVERA, RUBEN JIMENEZ, NIDIA RODRIGUEZ	07/06/2004	Deposit of check number 2026 drawn on Ocean Bank account number 060621346405 in the name of D. E. P.A.. made payable to D & H Investments of South Florida Inc. for \$75,000



COUNT	DEFENDANT	APPROXIMATE DATE OF FINANCIAL TRANSACTION	DESCRIPTION OF FINANCIAL TRANSACTION
48	HENRY J. QUINTERO, LAZARO VILLALBA, DAHOMAY TALAVERA, RUBEN JIMENEZ, NIDIA RODRIGUEZ	07/06/2004	Deposit of check number 1188 drawn on Washington Mutual Bank account number 0922947249 in the name of D & H Investments of South Florida Inc., made payable to Ruben Jimenez for \$25,000
49	HENRY J. QUINTERO, LAZARO VILLALBA, DAHOMAY TALAVERA, RUBEN JIMENEZ, NIDIA RODRIGUEZ	07/08/2004	Withdrawal of \$11,778 from Washington Mutual Bank account number 0922947249 in the name of D & H Investments of South Florida Inc., for the purchase of Washington Mutual Bank cashier's check number 203847017 for \$11,778 made payable to New World International
50	HENRY J. QUINTERO, LAZARO VILLALBA, DAHOMAY TALAVERA, RUBEN JIMENEZ, NIDIA RODRIGUEZ	07/08/2004	Withdrawal of \$28,179.10 from Washington Mutual Bank account number 0922947249 in the name of D & H Investments of South Florida Inc for the purchase of Washington Mutual Bank cashier's check number 2038470169 for \$28,179.10 made payable to D. E. P.A.

COUNT	DEFENDANT	APPROXIMATE DATE OF FINANCIAL TRANSACTION	DESCRIPTION OF FINANCIAL TRANSACTION
51	HENRY J. QUINTERO, LAZARO VILLALBA, DAHOMY TALAVERA, RUBEN JIMENEZ, NIDIA RODRIGUEZ	07/13/2004	Withdrawal of \$10,000 from SouthTrust Bank account number 17235014 in the name of Ruben Jimenez for the purchase of SouthTrust cashier's check number 13885658 for \$10,000 made payable to NIDIA RODRIGUEZ
52	HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO RAMOS, LUC BRUNA	8/11/2004	Deposit of check #1036 drawn on Regent Bank account number 010203483206 in the name of H. L. R. / Barrister Title Services of Weston made payable to Home Mortgage Finance Group for \$19,660
53	HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO RAMOS, LUC BRUNA	08/11/2004	Wire transfer of \$87,500 from Regent Bank account number 010203483206 in the name of H. L. R. / Barrister Title Services of Weston to Bank of America account number 003446957219 in the name of New World International Inc.
54	HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO RAMOS, LUC BRUNA	8/12/2004	Withdrawal of \$27,461.06 from Bank of America account number 003446957219 for the purchase of Bank of America cashier's check number 3769224 for \$27,461.06 made payable to Barrister Title Services Inc.

COUNT	DEFENDANT	APPROXIMATE DATE OF FINANCIAL TRANSACTION	DESCRIPTION OF FINANCIAL TRANSACTION
55	HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO RAMOS, LUC BRUNA	8/16/2004	Deposit of check number 1098 drawn on Bank of America account number 003446957219 in the name of New World International Inc. made payable to LUC BRUNA for \$15,000
56	HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO RAMOS, LUC BRUNA, MICHELLE VOLCY	8/16/2004	Deposit of check number 1099 drawn on Bank of America account number 003446957219 in the name of New World International Inc. made payable to MICHELLE VOLCY for \$2,500
57	HENRY J. QUINTERO, LAZARO VILLALBA, DAHOMY TALAVERA, ANTONIO RAMOS, LUC BRUNA	8/28/2004	Deposit of check number 1100 drawn on Bank of America account number 003446957219 in the name of New World International Inc. made payable to D & H Investments of South Florida Inc., for \$5,330
58	HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO RAMOS, FELIPE M. NUNEZ	10/05/2004	Deposit of check number 1194 drawn on Regent Bank account number 010203483206 in the name of H. L. R. / Barrister Title Services of Weston made payable to Home Mortgage Finance Group for \$15,375

COUNT	DEFENDANT	APPROXIMATE DATE OF FINANCIAL TRANSACTION	DESCRIPTION OF FINANCIAL TRANSACTION
59	HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO RAMOS, FELIPE M. NUNEZ	10/062004	Wire transfer of \$22,778.13 from Regent Bank account number 010203483206 in the name of H. L. R. / Barrister Title Services of Weston to Bank of America account number 003446957219 in the name of New World International Inc.
60	HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO RAMOS, FELIPE M. NUNEZ	10/06/2004	Withdrawal of \$22,778.13 from Bank of America account number 003446957219 in the name of New World International Inc for the purchase of Bank of America cashier's check number 3880705 for \$22,778.13 made payable to Barrister Title Services Inc.
61	HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO RAMOS, FELIPE M. NUNEZ	10/07/2004	Wire transfer of \$52,221.87 from Regent Bank account number 010203483206 in the name of H. L. R. / Barrister Title Services of Weston to Bank of America account number 003446957219 in the name of New World International Inc.
62	HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO RAMOS, FELIPE M. NUNEZ	10/07/2004	Withdrawal of \$6,000 from Bank of America account number 003446957219 in the name of New World International Inc for the purchase of Bank of America cashier's check number 3863404 for \$6,000 made payable to ANTONIO RAMOS

COUNT	DEFENDANT	APPROXIMATE DATE OF FINANCIAL TRANSACTION	DESCRIPTION OF FINANCIAL TRANSACTION
63	HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO RAMOS, FELIPE M. NUNEZ	10/07/2004	Withdrawal of \$10,000 from Bank of America account number 003446957219 in the name of New World International Inc for the purchase of Bank of America cashier's check number 3863405 for \$10,000 made payable to FELIPE M. NUNEZ
64	HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO RAMOS, FELIPE M. NUNEZ	10/07/2004	Deposit of check number 1119 drawn on Bank of America account number 003446957219 in the name of New World International Inc. made payable to LAZARO VILLALBA for \$6,365
65	HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO RAMOS, FELIPE M. NUNEZ	10/20/2004	Deposit of check number 1130 drawn on Bank of America account number 003446957219 in the name of New World International Inc. made payable to LAZARO VILLALBA for \$10,000
66	HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO RAMOS, FELIPE M. NUNEZ	10/22/2004	Deposit of check number 1219 drawn on Regent Bank account number 010203483206 in the name of H. L. R. / Barrister Title Services of Weston made payable to Home Mortgage Finance Group for \$14,400
67	HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO RAMOS, FELIPE M. NUNEZ	10/22/2004	Wire transfer of \$75,000 from Regent Bank account number 010203483206 in the name of H. L. R. / Barrister Title Services of Weston to Bank of America account number 003446957219 in the name of New World International Inc.

COUNT	DEFENDANT	APPROXIMATE DATE OF FINANCIAL TRANSACTION	DESCRIPTION OF FINANCIAL TRANSACTION
68	HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO RAMOS, FELIPE M. NUNEZ	10/22/2004	Withdrawal of \$16,898.51 from Bank of America account number 003446957219 in the name of New World International Inc for the purchase of Bank of America cashier's check number 3932026 for \$16,898.51 made payable to Barrister Title Services Inc.
69	HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO RAMOS, FELIPE M. NUNEZ	10/22/2004	Withdrawal of \$10,000 from Bank of America account number 003446957219 in the name of New World International Inc for the purchase of Bank of America cashier's check number 3932027 for \$10,000 made payable to FELIPE M. NUNEZ
70	HENRY J. QUINTERO, LAZARO VILLALBA, ANTONIO RAMOS, FELIPE M. NUNEZ	10/22/2004	Withdrawal of \$6,000 from Bank of America account number 003446957219 in the name of New World International Inc., for the purchase of Bank of America cashier's check number 3932028 for \$6,000 made payable to ANTONIO RAMOS

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 2.

## CRIMINAL FORFEITURE

### 18 U.S.C. § 982

178. The allegations contained in Counts 1 through 70 of this Indictment are realleged and by this reference and fully incorporated herein for the purposes of alleging forfeiture to the United States of America of certain property in which one or more of the defendants has an interest, pursuant to Title 18, United States Code, Section 982(a)(1).

23. Upon conviction of any violation of Title 18, United States Code, Section 1343, and/or Title 18, United States Code, Section 1344, and/or a conspiracy to violate Title 18, United States Code, Section 1341 and/or Title 18, United States Code, Section 1343, and/or Title 18, United States Code, Section 1344 the defendants shall forfeit to the United States, any property, real or personal which constitutes or is derived from proceeds traceable to such violation(s), pursuant to Title 18, United States Code, Section 981(a)(1)(c), as incorporated by Title 28, United States Code, Section 2461(c).

24. Upon conviction of any violation of Title 18, United States Code, Section 1956, the defendants shall forfeit to the United States, any property, real or personal which is involved in such offense, or any property traceable to such property, pursuant to Title 18, United States Code, Section 982(a)(1).

25. The property subject to forfeiture includes but is not limited to the following:

- A. The sum of at least five hundred seventy two thousand dollars (\$572,000).
- B. Residence located at 6402 SW 185<sup>th</sup> Way, Southwest Ranches, Broward County, Florida 33332 which is more particularly described as: Everglades Land Co Sub 2-1 D 1-51-39 TR 17 N 160.29 of S 480.87 Less PT lying withing E 120 of Sec.


182. If the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

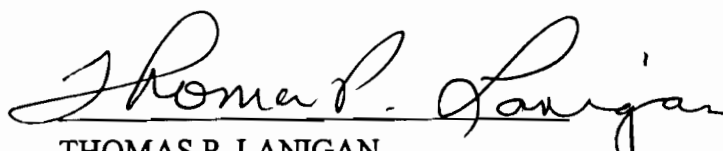
1. Cannot be located upon the exercise of due diligence;
2. Has been transferred, sold or deposited with a third party;
3. Has been place beyond the jurisdiction of the court;
4. Has been substantially diminished in value;
5. Has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by reference by Title 18, United States Code, Section 982(b), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property of the defendants.

All pursuant to Title 18, United States Code, Section 982 and Title 21, United States Code, Section 853.

  
\_\_\_\_\_  
R. ALEXANDER ACOSTA  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
FOREPERSON

  
\_\_\_\_\_  
THOMAS P. LANIGAN  
ASSISTANT UNITED STATES ATTORNEY



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO. \_\_\_\_\_

vs.

CERTIFICATE OF TRIAL ATTORNEY\*

HENRY QUINTERO-LOPEZ,  
a/k/a Henry J. Quintero, et al.,  
Defendants.

Superseding Case Information:

Court Division: (Select One)

New Defendant(s) Yes \_\_\_\_\_ No \_\_\_\_\_  
Number of New Defendants \_\_\_\_\_  
Total number of counts \_\_\_\_\_

\_\_\_\_\_ Miami \_\_\_\_\_ Key West  
X FTL \_\_\_\_\_ WPB \_\_\_\_\_ FTP

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.

3. Interpreter: (Yes or No) Yes  
List language and/or dialect \_\_\_\_\_

4. This case will take 6-10 days for the parties to try.

5. Please check appropriate category and type of offense listed below:  
(Check only one) (Check only one)

I	0 to 5 days	_____	Petty	_____
II	6 to 10 days	<u>X</u>	Minor	_____
III	11 to 20 days	_____	Misdem.	_____
IV	21 to 60 days	_____	Felony	<u>X</u>
V	61 days and over	_____		

6. Has this case been previously filed in this District Court? (Yes or No) No

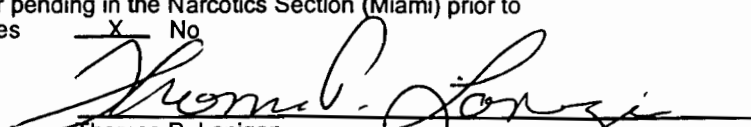
If yes  
Judge: \_\_\_\_\_ Case No. \_\_\_\_\_

(Attach copy of dispositive order)  
Has a complaint been filed in this matter? (Yes or No) No

If yes:  
Magistrate Case No. \_\_\_\_\_  
Related Miscellaneous numbers: \_\_\_\_\_  
Defendant(s) in federal custody as of \_\_\_\_\_  
Defendant(s) in state custody as of \_\_\_\_\_  
Rule 20 from the \_\_\_\_\_ District of \_\_\_\_\_

Is this a potential death penalty case? (Yes or No) No

7. Does this case originate from a matter pending in the U.S. Attorney's Office prior to April 1, 2003? \_\_\_\_\_ Yes X No
8. Does this case originate from a matter pending in the U. S. Attorney's Office prior to April 1, 1999? \_\_\_\_\_ Yes X No  
If yes, was it pending in the Central Region? \_\_\_\_\_ Yes \_\_\_\_\_ No
9. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to October 14, 2003? \_\_\_\_\_ Yes X No
10. Does this case originate from a matter pending in the Narcotics Section (Miami) prior to May 18, 2003? \_\_\_\_\_ Yes X No

  
Thomas P. Lanigan  
ASSISTANT UNITED STATES ATTORNEY  
Court Bar No. A5500033

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: HENRY QUINTERO-LOPEZ , a/k/a Henry J. Quintero

Case No: \_\_\_\_\_

Counts #: 1

Conspiracy to commit bank fraud, mail fraud and wire fraud

Title 18 U.S.C. § 1349

\* Max. Penalty: 30 years' imprisonment; \$1,000,000 fine and 5 years' supervised release

Counts #: 2 – 9

Bank Fraud

Title 18 U.S.C. §§ 1344 and 2

\*Max. Penalty: 30 years' imprisonment; \$1,000,000 fine and 5 years' supervised release

Counts #: 10 – 25

WireFraud

Title 18 U.S.C. §§1343 and 2

\*Max. Penalty: 20 years' imprisonment; \$250,000 fine and 3 years' supervised release

Count #: 26

Money Laundering Conspiracy

Title 18 U.S.C. § 1956h

\*Max. Penalty: 20 years' imprisonment; \$500,000 fine or twice the value of the property involved in transaction, whichever is greater and 3 years' supervised release

Counts #: 27 – 70

Money Laundering

Title 18 U.S.C. §1956(a)(1)(A)(i)

\*Max. Penalty: 20 years' imprisonment; \$500,000 fine or twice the value of the property involved in transaction, whichever is greater and 3 years' supervised release

\*refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: LAZARO VILLALBA

Case No: \_\_\_\_\_

Counts #: 1

Conspiracy to commit bank fraud, mail fraud and wire fraud

Title 18 U.S.C. § 1349

**\* Max. Penalty:** 30 years' imprisonment; \$1,000,000 fine and 5 years' supervised release

Counts #: 2 – 9

Bank Fraud

Title 18 U.S.C. §§ 1344 and 2

**\*Max. Penalty:** 30 years' imprisonment; \$1,000,000 fine and 5 years' supervised release

Counts #: 10 – 25

WireFraud

Title 18 U.S.C. §§1343 and 2

**\*Max. Penalty:** 20 years' imprisonment; \$250,000 fine and 3 years' supervised release

Count #: 26

Money Laundering Conspiracy

Title 18 U.S.C. § 1956h

**\*Max. Penalty:** 20 years' imprisonment; \$500,000 fine or twice the value of the property involved in transaction, whichever is greater and 3 years' supervised release

Counts #: 27 – 70

Money Laundering

Title 18 U.S.C. §1956(a)(1)(A)(i)

**\*Max. Penalty:** 20 years' imprisonment; \$500,000 fine or twice the value of the property involved in transaction, whichever is greater and 3 years' supervised release

**\*refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: DAHOMY TALAVERA

Case No: \_\_\_\_\_

Counts #: 1

Conspiracy to commit bank fraud, mail fraud and wire fraud

Title 18 U.S.C. § 1349

\* Max. Penalty: 30 years' imprisonment; \$1,000,000 fine and 5 years' supervised release

Counts #: 2 - 9

Bank Fraud

Title 18 U.S.C. §§ 1344 and 2

\*Max. Penalty: 30 years' imprisonment; \$1,000,000 fine and 5 years' supervised release

Counts #: 12 and 13

WireFraud

Title 18 U.S.C. §§1343 and 2

\*Max. Penalty: 20 years' imprisonment; \$250,000 fine and 3 years' supervised release

Count #: 26

Money Laundering Conspiracy

Title 18 U.S.C. § 1956h

\*Max. Penalty: 20 years' imprisonment; \$500,000 fine or twice the value of the property involved in transaction, whichever is greater, and 3 years' supervised release

Counts #: 27 - 31, 35, 44, 47 - 51 and 57

Money Laundering

Title 18 U.S.C. §1956(a)(1)(A)(i)

\*Max. Penalty: 20 years' imprisonment; \$500,000 fine or twice the value of the property involved in transaction, whichever is greater, and 3 years' supervised release

\*refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: RUBEN JIMENEZ

Case No: \_\_\_\_\_

Counts #: 1

Conspiracy to commit bank fraud, mail fraud and wire fraud

Title 18 U.S.C. § 1349

\* Max. Penalty: 30 years' imprisonment; \$1,000,000 fine and 5 years' supervised release

Counts #: 2 – 9

Bank Fraud

Title 18 U.S.C. §§ 1344 and 2

\*Max. Penalty: 30 years' imprisonment; \$1,000,000 fine and 5 years' supervised release

Counts #: 10 – 13

Wire Fraud

Title 18 U.S.C. §§1343 and 2

\*Max. Penalty: 20 years' imprisonment; \$250,000 fine and 3 years' supervised release

Count #: 26

Money Laundering Conspiracy

Title 18 U.S.C. § 1956h

\*Max. Penalty: 20 years' imprisonment; \$500,000 fine or twice the value of the property involved in transaction, whichever is greater, and 3 years' supervised release

Counts #: 27 – 51

Money Laundering

Title 18 U.S.C. §1956(a)(1)(A)(i)

\*Max. Penalty: 20 years' imprisonment; \$500,000 fine or twice the value of the property involved in transaction, whichever is greater, and 3 years' supervised release

\*refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: ANTONIO C. RAMOS

Case No: \_\_\_\_\_

Count #: 1

Conspiracy to commit bank fraud, mail fraud and wire fraud

Title 18 U.S.C. § 1349

\* Max. Penalty: 30 years' imprisonment; \$1,000,000 fine and 5 years' supervised release

Counts #: 14 – 16, 17 – 21, and 22 – 25

Wire Fraud

Title 18 U.S.C. §§1343 and 2

\*Max. Penalty: 20 years' imprisonment; \$250,000 fine and 3 years' supervised release

Count #: 26

Money Laundering Conspiracy

Title 18 U.S.C. § 1956h

\*Max. Penalty: 20 years' imprisonment; \$500,000 fine or twice the value of the property involved in transaction, whichever is greater, and 3 years' supervised release

Counts #: 52 – 70

Money Laundering

\* Title 18 U.S.C. §1956(a)(1)(A)(i)

\*Max. Penalty: 20 years' imprisonment; \$500,000 fine or twice the value of the property involved in transaction, whichever is greater, and 3 years' supervised release

Count #:

\*Max. Penalty:

\*refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: JOAQUIN M. PEREA

Case No: \_\_\_\_\_

Counts #: 1

Conspiracy to commit bank fraud, mail fraud and wire fraud

Title 18 U.S.C. § 1349

**\* Max. Penalty:** 30 years' imprisonment; \$1,000,000 fine and 5 years' supervised release

Counts #: 10 – 13, 16 – 18, and 20 – 25

Wire Fraud

Title 18 U.S.C. §§1343 and 2

**\*Max. Penalty:** 20 years' imprisonment; \$250,000 fine and 3 years' supervised release

Count # : \_\_\_\_\_

**\*Max. Penalty:** \_\_\_\_\_

Count # : \_\_\_\_\_

**\*Max. Penalty:** \_\_\_\_\_

Count # : \_\_\_\_\_

**\*Max. Penalty:** \_\_\_\_\_

**\*refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: RAUL ERIC GARCIA, a/k/a Eric Garcia

Case No: \_\_\_\_\_

Counts #: 1

Conspiracy to commit bank fraud, mail fraud and wire fraud

Title 18 U.S.C. § 1349

\* Max. Penalty: 30 years' imprisonment; \$1,000,000 fine and 5 years' supervised release

Counts #: 2 - 9

Bank Fraud

Title 18 U.S.C. §§ 1344 and 2

\*Max. Penalty: 30 years' imprisonment; \$1,000,000 fine and 5 years' supervised release

Counts #:

\*Max. Penalty:

Count #:

\*Max. Penalty:

Count #:

\*Max. Penalty:

\*refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: MARTINE YANISSE CASTRILLON

Case No: \_\_\_\_\_

Count #: 1

Conspiracy to commit bank fraud, mail fraud and wire fraud

Title 18 U.S.C. § 1349

**\* Max. Penalty:** 30 years' imprisonment; \$1,000,000 fine and 5 years' supervised release

Counts #: 12 and 13, 16 and 17, 20 and 21

Wire Fraud

Title 18 U.S.C. §§1343 and 2

**\*Max. Penalty:** 20 years' imprisonment; \$1,000,000 fine and 5 years' supervised release

Counts #:

**\*Max. Penalty:**

Count #:

**\*Max. Penalty:**

Count #:

**\*Max. Penalty:**

**\*refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: FELIPE NUNEZ

Case No: \_\_\_\_\_

Count #: 1

Conspiracy to commit bank fraud, mail fraud and wire fraud

Title 18 U.S.C. § 1349

\* Max. Penalty: 30 years' imprisonment; \$1,000,000 fine and 5 years' supervised release

Counts #: 18 – 25,

Wire Fraud

Title 18 U.S.C. §§1343 and 2

\*Max. Penalty: 20 years' imprisonment; \$250,000 fine and 3 years' supervised release

Count #: 26

Money Laundering Conspiracy

Title 18 U.S.C. § 1956h

\*Max. Penalty: 20 years' imprisonment; \$500,000 fine or twice the value of the property involved in transaction, whichever is greater, and 3 years' supervised release

Counts #: 58 – 70

Money Laundering

Title 18 U.S.C. §1956(a)(1)(A)(i)

\*Max. Penalty: 20 years' imprisonment; \$500,000 fine or twice the value of the property involved in transaction, whichever is greater, and 3 years' supervised release

Count #:

\* Max. Penalty:

\*refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: MICHELLE VOLCY

Case No: \_\_\_\_\_

Counts #: 1

Conspiracy to commit bank fraud, mail fraud and wire fraud

Title 18 U.S.C. § 1349

\* Max. Penalty: 30 years' imprisonment; \$1,000,000 fine and 5 years' supervised release

Counts #: 4 and 5

Bank Fraud

Title 18 U.S.C. §§ 1344 and 2

\*Max. Penalty: 30 years' imprisonment; \$1,000,000 fine and 5 years' supervised release

Count #: 26

Money Laundering Conspiracy

Title 18 U.S.C. §11956h

\*Max. Penalty: 20 years' imprisonment; \$500,000 fine or twice the value of the property involved in transaction, whichever is greater, and 3 years' supervised release

Counts #: 32 – 37 and 56

Money Laundering

Title 18 U.S.C. § 1956(a)(1)(A)(i)

\*Max. Penalty: 20 years' imprisonment; \$500,000 fine or twice the value of the property involved in transaction, whichever is greater, and 3 years' supervised release

Count #:

\*Max. Penalty:

\*refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: LUC BRUNA

Case No: \_\_\_\_\_

Count #: 1

Conspiracy to commit bank fraud, mail fraud and wire fraud

Title 18 U.S.C. § 1349

\* Max. Penalty: 30 years' imprisonment; \$1,000,000 fine and 5 years' supervised release

Counts #: 16-17

Wire Fraud

Title 18 U.S.C. §§1343 and 2

\*Max. Penalty: 20 years' imprisonment; \$250,000 fine and 3 years' supervised release

Count #: 26

Money Laundering Conspiracy

Title 18 U.S.C. §1956(h)

\*Max. Penalty: 20 years' imprisonment; \$500,000 fine, or twice the value of the property involved in the transaction, whichever is greater, and 3 years' supervised release

Counts #: 52 - 57

\* Money Laundering

Title 18 U.S.C. §1956(a)(1)(A)(i)

\*Max. Penalty: 20 years' imprisonment; \$500,000 fine, or twice the value of the property involved in the transaction, whichever is greater, and 3 years' supervised release

\*refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: MAYKEL CLAVERO-GONZALEZ, a/k/a Maykel Clavero

Case No: \_\_\_\_\_

Count #: 1

Conspiracy to commit bank fraud, mail fraud and wire fraud

Title 18 U.S.C. § 1349

\* Max. Penalty: 30 years' imprisonment; \$1,000,000 fine and 5 years' supervised release

Counts #: 8 and 9

Bank Fraud

Title 18 U.S.C. §§ 1344 and 2

\*Max. Penalty: 30 years' imprisonment; \$1,000,000 fine and 5 years' supervised release

Count #: 26

Money Laundering Conspiracy

Title 18 U.S.C. § 1956h

\*Max. Penalty: 20 years' imprisonment; \$500,000 fine or twice the value of the property involved in transaction, whichever is greater, and 3 years' supervised release

Counts #: 40 – 45

Money Laundering

Title 18, U.S.C. § 1956(a)(1)(A)(i)

\*Max. Penalty: 20 years' imprisonment; \$500,000 fine or twice the value of the property involved in transaction, whichever is greater, and 3 years' supervised release

Count #:

\*Max. Penalty

**\*refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: IRAY PONTE

Case No: \_\_\_\_\_

Count #: 1

Conspiracy to commit bank fraud, mail fraud and wire fraud

Title 18 U.S.C. § 1349

**\* Max. Penalty:** 30 years' imprisonment; \$1,000,000 fine and 5 years' supervised release

Counts #: 2 and 3

Bank Fraud

Title 18 U.S.C. §§ 1344 and 2

**\*Max. Penalty:** 30 years' imprisonment; \$1,000,000 fine and 5 years' supervised release

Count #: 26

Money Laundering Conspiracy

Title 18 U.S.C. § 1956h

**\*Max. Penalty:** 20 years' imprisonment; \$500,000 fine or twice the value of the property involved in transaction, whichever is greater, and 3 years' supervised release

Counts #: 27 – 31

Money Laundering

Title 18 U.S.C. § 1956(a)(1)(A)(i)

**\*Max. Penalty:** 20 years' imprisonment; \$500,000 fine or twice the value of the property involved in transaction, whichever is greater, and 3 years' supervised release

Count #:

**\*Max. Penalty**

**\*refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: NIDIA RODRIGUEZ-RIAL , a/k/a Nidia Rodriguez

Case No: \_\_\_\_\_

Count #: 1

Conspiracy to commit bank fraud, mail fraud and wire fraud

Title 18 U.S.C. § 1349

\* Max. Penalty: 30 years' imprisonment; \$1,000,000 fine and 5 years' supervised release

Counts #: 12 and 13

WireFraud

Title 18 U.S.C. §§1343 and 2

\*Max. Penalty: 20 years' imprisonment; \$1,000,000 fine and 5 years' supervised release

Count #: 26

Money Laundering Conspiracy

Title 18 U.S.C. § 1956h

\*Max. Penalty: 20 years' imprisonment; \$500,000 fine or twice the value of the property involved in transaction, whichever is greater and 3 years' supervised release

Counts #: 46 – 51

\* Money Laundering

Title 18 U.S.C. § 1956(a)(1)(A)(i)

\*Max. Penalty: 20 years' imprisonment; \$500,000 fine or twice the value of the property involved in transaction, whichever is greater, and 3 years' supervised release

\*refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: ILIANA LIMA

Case No: \_\_\_\_\_

Count #: 1

Conspiracy to commit bank fraud, mail fraud and wire fraud

Title 18 U.S.C. § 1349

\* Max. Penalty: 30 years' imprisonment; \$1,000,000 fine and 5 years' supervised release

Counts #: 6 and 7

Bank Fraud

Title 18 U.S.C. §§ 1344 and 2

\*Max. Penalty: 30 years' imprisonment; \$1,000,000 fine and 5 years' supervised release

Count #: 26

Money Laundering Conspiracy

Title 18 U.S.C. § 1956h

\*Max. Penalty: 20 years' imprisonment; \$500,000 fine or twice the value of the property involved in transaction, whichever is greater and 3 years' supervised release

Count #: 39

Money Laundering

Title 18 U.S.C. § 1956(a)(1)(A)(i)

\*Max. Penalty: 20 years' imprisonment; \$500,000 fine or twice the value of the property involved in transaction, whichever is greater, and 3 years' supervised release

Count #:

\*Max. Penalty:

\*refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.