

I N D I C T M E N T

S U P R E M E C O U R T O F T H E S T A T E O F N E W Y O R K  
C O U N T Y O F Q U E E N S

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

AGAINST

CYRUS IRANI  
DEFENDANT

SAUL SALAMA  
DEFENDANT

JOHNSON MATHEW  
DEFENDANT

SALLY MEDINA-CABELLO  
DEFENDANT

RICHARD VANDERWYK  
DEFENDANT

JEFFREY METELITZ  
DEFENDANT

DAVID CHANG  
DEFENDANT

JIMMY JOSEPH  
DEFENDANT

JULIO ALVARENGA  
DEFENDANT

THOMAS CORTESE  
DEFENDANT

FILED:  
INDICTMENT NO. 2037/2015

ANDRES ARRIAGA  
DEFENDANT

MICHAEL GALLAGHER  
DEFENDANT

CASSONDRA SMITH-LUTTMAN  
DEFENDANT

CLARK W BRUNER  
DEFENDANT

CLARK OLIVER BRUNER  
DEFENDANT

CHRISTOPHER BRUNER  
DEFENDANT

MICHAEL GALOYAN  
DEFENDANT

PL 460.20-1A ENTERPRISE CORRUPTION (1)

( IRANI , CYRUS )  
( SALAMA , SAUL )  
( MATHEW , JOHNSON )  
( MEDINA-CABELLO ,  
SALLY )  
( VANDERWYK , RICHARD )  
( METELITZ , JEFFREY )  
( CHANG , DAVID )  
( JOSEPH , JIMMY )  
( ALVARENGA , JULIO )  
( CORTESE , THOMAS )  
( ARRIAGA , ANDRES )  
( GALLAGHER , MICHAEL )  
( SMITH-LUTTMAN ,  
CASSONDRA )  
( BRUNER , CLARK W )  
( BRUNER , CLARK OLIVER )

		( BRUNER , CHRISTOPHER ) ( GALOYAN , MICHAEL )
PL 470.20-1B-IA	MONEY LAUNDERING IN THE FIRST DEGREE ( 2 )	( IRANI , CYRUS ) ( SALAMA , SAUL ) ( MATHEW , JOHNSON ) ( VANDERWYK , RICHARD ) ( METELITZ , JEFFREY ) ( CHANG , DAVID ) ( CORTESE , THOMAS ) ( ARRIAGA , ANDRES ) ( GALLAGHER , MICHAEL ) ( BRUNER , CLARK W ) ( BRUNER , CLARK OLIVER ) ( BRUNER , CHRISTOPHER ) ( GALOYAN , MICHAEL )
PL 470.15-1B-IA	MONEY LAUNDERING IN THE SECOND DEGREE ( 3 )	( IRANI , CYRUS ) ( MATHEW , JOHNSON )
PL 105.05-1	CONSPIRACY IN THE FIFTH DEGREE ( 4 )	( IRANI , CYRUS ) ( SALAMA , SAUL ) ( MATHEW , JOHNSON ) ( MEDINA-CABELLO , SALLY ) ( VANDERWYK , RICHARD ) ( METELITZ , JEFFREY ) ( CHANG , DAVID ) ( JOSEPH , JIMMY ) ( ALVARENGA , JULIO ) ( CORTESE , THOMAS ) ( ARRIAGA , ANDRES ) ( GALLAGHER , MICHAEL ) ( SMITH-LUTTMAN , CASSONDRA ) ( BRUNER , CLARK W ) ( BRUNER , CLARK OLIVER ) ( BRUNER , CHRISTOPHER ) ( GALOYAN , MICHAEL )
PL 225.10-1	PROMOTING GAMBLING IN THE FIRST DEGREE	( IRANI , CYRUS ) ( MATHEW , JOHNSON )

	( 5,11-12,14-18,23-24,69)	( MEDINA-CABELLO, SALLY ) ( JOSEPH, JIMMY )
PL 470.10-1B-IA	MONEY LAUNDERING IN THE THIRD DEGREE ( 6 )	( IRANI, CYRUS ) ( GALOYAN, MICHAEL )
PL 105.05-1	CONSPIRACY IN THE FIFTH DEGREE ( 7 )	( IRANI, CYRUS ) ( GALOYAN, MICHAEL )
PL 470.05-2A-I	MONEY LAUNDERING IN THE FOURTH DEGREE ( 8, 46 )	( IRANI, CYRUS ) ( ARRIAGA, ANDRES )
PL 470.05-2A-I	MONEY LAUNDERING IN THE FOURTH DEGREE ( 9, 125 )	( IRANI, CYRUS ) ( METELITZ, JEFFREY )
PL 470.05-2A-I	MONEY LAUNDERING IN THE FOURTH DEGREE ( 10, 122 )	( IRANI, CYRUS ) ( CHANG, DAVID )
PL 470.05-2A-I	MONEY LAUNDERING IN THE FOURTH DEGREE ( 13, 38, 42, 45, 48, 89, 115 )	( IRANI, CYRUS ) ( SALAMA, SAUL )
PL 225.10-1	PROMOTING GAMBLING IN THE FIRST DEGREE ( 19-21, 70, 72 )	( IRANI, CYRUS ) ( MEDINA-CABELLO, SALLY ) ( METELITZ, JEFFREY )
PL 225.10-1	PROMOTING GAMBLING IN THE FIRST DEGREE ( 22, 71 )	( IRANI, CYRUS ) ( MATHEW, JOHNSON ) ( MEDINA-CABELLO, SALLY ) ( METELITZ, JEFFREY ) ( JOSEPH, JIMMY )
PL 470.10-1B-IA	MONEY LAUNDERING IN THE THIRD DEGREE ( 25 )	( IRANI, CYRUS ) ( CORTESE, THOMAS )
PL 470.05-1A-IIA	MONEY LAUNDERING IN THE FOURTH DEGREE ( 26-27, 73 )	( IRANI, CYRUS )
PL 225.10-1	PROMOTING GAMBLING IN THE	( IRANI, CYRUS )

	FIRST DEGREE ( 28-32, 34-35, 90-94, 98-100 )	( MEDINA-CABELLO, SALLY ) ( BRUNER, CLARK W ) ( BRUNER, CLARK OLIVER ) ( BRUNER, CHRISTOPHER )
PL 470.05-2A-I	MONEY LAUNDERING IN THE FOURTH DEGREE ( 33, 51, 54, 58-59, 63, 87, 101, 112 )	( IRANI, CYRUS ) ( BRUNER, CLARK W ) ( BRUNER, CLARK OLIVER )
PL 225.10-1	PROMOTING GAMBLING IN THE FIRST DEGREE ( 36-37, 39-40, 43-44 )	( IRANI, CYRUS ) ( SALAMA, SAUL ) ( MATHEW, JOHNSON ) ( MEDINA-CABELLO, SALLY ) ( METELITZ, JEFFREY ) ( JOSEPH, JIMMY ) ( ALVARENGA, JULIO ) ( ARRIAGA, ANDRES )
PL 225.10-1	PROMOTING GAMBLING IN THE FIRST DEGREE ( 41 )	( IRANI, CYRUS ) ( SALAMA, SAUL ) ( MATHEW, JOHNSON ) ( MEDINA-CABELLO, SALLY ) ( METELITZ, JEFFREY ) ( JOSEPH, JIMMY )
PL 470.05-2A-I	MONEY LAUNDERING IN THE FOURTH DEGREE ( 47 )	( IRANI, CYRUS ) ( VANDERWYK, RICHARD )
PL 105.10-1	CONSPIRACY IN THE FOURTH DEGREE ( 49 )	( IRANI, CYRUS ) ( SALAMA, SAUL )
PL 470.15-1B-IA	MONEY LAUNDERING IN THE SECOND DEGREE ( 50 )	( IRANI, CYRUS ) ( SALAMA, SAUL )
PL 225.10-1	PROMOTING GAMBLING IN THE FIRST DEGREE ( 52, 103 )	( IRANI, CYRUS ) ( SALAMA, SAUL ) ( MEDINA-CABELLO, SALLY ) ( CORTESE, THOMAS )

PL 225.10-1	PROMOTING GAMBLING IN THE FIRST DEGREE ( 53,55-56,60,106-109)	( IRANI, CYRUS ) ( MEDINA-CABELLO, SALLY ) ( CORTESE, THOMAS )
PL 470.05-2A-I	MONEY LAUNDERING IN THE FOURTH DEGREE ( 57 )	( IRANI, CYRUS ) ( MATHEW, JOHNSON )
PL 225.10-1	PROMOTING GAMBLING IN THE FIRST DEGREE ( 61-62,64,86,88,102,105)	( IRANI, CYRUS ) ( MEDINA-CABELLO, SALLY ) ( SMITH-LUTTMAN, CASSONDRA )
PL 225.10-1	PROMOTING GAMBLING IN THE FIRST DEGREE ( 65-66,68 )	( IRANI, CYRUS ) ( MEDINA-CABELLO, SALLY ) ( ALVARENGA, JULIO ) ( ARRIAGA, ANDRES )
PL 225.10-1	PROMOTING GAMBLING IN THE FIRST DEGREE ( 67 )	( IRANI, CYRUS ) ( MEDINA-CABELLO, SALLY ) ( ALVARENGA, JULIO ) ( ARRIAGA, ANDRES ) ( SMITH-LUTTMAN, CASSONDRA )
PL 470.15-1B-IA	MONEY LAUNDERING IN THE SECOND DEGREE ( 74 )	( IRANI, CYRUS ) ( CHANG, DAVID )
PL 225.10-1	PROMOTING GAMBLING IN THE FIRST DEGREE ( 75 )	( IRANI, CYRUS ) ( MEDINA-CABELLO, SALLY ) ( GALLAGHER, MICHAEL ) ( GALOYAN, MICHAEL )
PL 225.10-1	PROMOTING GAMBLING IN THE FIRST DEGREE ( 76 )	( IRANI, CYRUS ) ( SALAMA, SAUL ) ( MEDINA-CABELLO, SALLY )

		( METELITZ , JEFFREY ) ( CORTESE , THOMAS ) ( GALLAGHER , MICHAEL ) ( SMITH-LUTTMAN , CASSONDRA ) ( GALOYAN , MICHAEL )
PL 225.10-1	PROMOTING GAMBLING IN THE FIRST DEGREE (77)	( IRANI , CYRUS ) ( SALAMA , SAUL ) ( MATHEW , JOHNSON ) ( MEDINA-CABELLO , SALLY ) ( METELITZ , JEFFREY ) ( JOSEPH , JIMMY ) ( ALVARENGA , JULIO ) ( CORTESE , THOMAS ) ( ARRIAGA , ANDRES ) ( GALLAGHER , MICHAEL ) ( SMITH-LUTTMAN , CASSONDRA ) ( BRUNER , CLARK W ) ( BRUNER , CLARK OLIVER ) ( BRUNER , CHRISTOPHER ) ( GALOYAN , MICHAEL )
PL 225.10-1	PROMOTING GAMBLING IN THE FIRST DEGREE (78)	( IRANI , CYRUS ) ( MATHEW , JOHNSON ) ( MEDINA-CABELLO , SALLY ) ( METELITZ , JEFFREY ) ( JOSEPH , JIMMY ) ( GALLAGHER , MICHAEL ) ( BRUNER , CLARK W ) ( BRUNER , CLARK OLIVER ) ( BRUNER , CHRISTOPHER ) ( GALOYAN , MICHAEL )
PL 470.05-2A-I	MONEY LAUNDERING IN THE FOURTH DEGREE (79,111)	( IRANI , CYRUS ) ( VANDERWYK , RICHARD ) ( BRUNER , CLARK W )
PL 225.10-1	PROMOTING GAMBLING IN THE	( IRANI , CYRUS )

FIRST DEGREE (80)

( MATHEW, JOHNSON )  
( MEDINA-CABELLO,  
SALLY )  
( JOSEPH, JIMMY )  
( GALLAGHER, MICHAEL )  
( BRUNER, CLARK W )  
( BRUNER, CLARK OLIVER )  
( BRUNER, CHRISTOPHER )

PL 225.10-1      PROMOTING GAMBLING IN THE  
FIRST DEGREE (81-83)

( IRANI, CYRUS )  
( MATHEW, JOHNSON )  
( MEDINA-CABELLO,  
SALLY )  
( JOSEPH, JIMMY )  
( GALLAGHER, MICHAEL )  
( BRUNER, CLARK W )  
( BRUNER, CLARK OLIVER )  
( BRUNER, CHRISTOPHER )  
( GALOYAN, MICHAEL )

PL 225.10-1      PROMOTING GAMBLING IN THE  
FIRST DEGREE (84)

( IRANI, CYRUS )  
( SALAMA, SAUL )  
( MATHEW, JOHNSON )  
( MEDINA-CABELLO,  
SALLY )  
( JOSEPH, JIMMY )  
( ALVARENGA, JULIO )  
( CORTESE, THOMAS )  
( ARRIAGA, ANDRES )  
( GALLAGHER, MICHAEL )  
( BRUNER, CLARK W )  
( BRUNER, CLARK OLIVER )  
( BRUNER, CHRISTOPHER )  
( GALOYAN, MICHAEL )

PL 225.10-1      PROMOTING GAMBLING IN THE  
FIRST DEGREE (85)

( IRANI, CYRUS )  
( MATHEW, JOHNSON )  
( MEDINA-CABELLO,  
SALLY )  
( JOSEPH, JIMMY )  
( GALLAGHER, MICHAEL )  
( SMITH-LUTTMAN,



		CASSONDRA)
PL 225.10-1	PROMOTING GAMBLING IN THE FIRST DEGREE (95)	( IRANI ,CYRUS) ( MEDINA-CABELLO , SALLY) ( SMITH-LUTTMAN , CASSONDRA) ( BRUNER ,CLARK W) ( BRUNER ,CLARK OLIVER) ( BRUNER ,CHRISTOPHER)
PL 225.10-1	PROMOTING GAMBLING IN THE FIRST DEGREE (96-97)	( IRANI ,CYRUS) ( SALAMA ,SAUL) ( MEDINA-CABELLO , SALLY) ( BRUNER ,CLARK W) ( BRUNER ,CLARK OLIVER) ( BRUNER ,CHRISTOPHER)
PL 225.10-1	PROMOTING GAMBLING IN THE FIRST DEGREE (104)	( IRANI ,CYRUS) ( MEDINA-CABELLO , SALLY) ( CORTESE , THOMAS) ( SMITH-LUTTMAN , CASSONDRA)
PL 470.05-2A-I	MONEY LAUNDERING IN THE FOURTH DEGREE (110)	( IRANI ,CYRUS) ( VANDERWYK ,RICHARD) ( BRUNER ,CLARK W) ( BRUNER ,CHRISTOPHER)
PL 470.05-2A-I	MONEY LAUNDERING IN THE FOURTH DEGREE (113)	( IRANI ,CYRUS) ( GALLAGHER ,MICHAEL)
PL 470.05-2A-I	MONEY LAUNDERING IN THE FOURTH DEGREE (114)	( IRANI ,CYRUS) ( CHANG ,DAVID) ( BRUNER ,CLARK W)
PL 225.10-1	PROMOTING GAMBLING IN THE FIRST DEGREE (116,120-121,123,126)	( IRANI ,CYRUS) ( SALAMA ,SAUL) ( MEDINA-CABELLO , SALLY)

PL 470.10-1B-IA MONEY LAUNDERING IN THE  
THIRD DEGREE (117)

( IRANI ,CYRUS )  
( VANDERWYK ,RICHARD )  
( BRUNER ,CLARK W )

PL 470.05-2A-I MONEY LAUNDERING IN THE  
FOURTH DEGREE (118)

( IRANI ,CYRUS )  
( BRUNER ,CLARK W )

PL 470.05-2A-I MONEY LAUNDERING IN THE  
FOURTH DEGREE (119)

( IRANI ,CYRUS )  
( VANDERWYK ,RICHARD )  
( CHANG ,DAVID )  
( BRUNER ,CLARK W )

PL 470.10-1B-IA MONEY LAUNDERING IN THE  
THIRD DEGREE (124)

( IRANI ,CYRUS )  
( CHANG ,DAVID )  
( BRUNER ,CLARK W )

A TRUE BILL

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FOREMAN

DISTRICT ATTORNEY

FIRST COUNT

ENTERPRISE CORRUPTION

THE GRAND JURY OF THE COUNTY OF QUEENS, BY THIS INDICTMENT, ACCUSES THE DEFENDANTS, EACH AIDING AND ACTING IN CONCERT WITH EACH OTHER AND OTHERS KNOWN AND UNKNOWN TO THE GRAND JURY, OF THE CRIME OF ENTERPRISE CORRUPTION, IN VIOLATION OF PENAL LAW SECTION 460.20(1)(A), COMMITTED IN THE COUNTY OF QUEENS AND ELSEWHERE, AS FOLLOWS:

THE DEFENDANTS, ON OR ABOUT AND BETWEEN JANUARY 3, 2013 AND SEPTEMBER 8, 2015, HAVING KNOWLEDGE OF THE EXISTENCE OF A CRIMINAL ENTERPRISE, TO WIT: AN ILLEGAL GAMBLING OPERATION, AND THE NATURE OF ITS ACTIVITIES, AND BEING EMPLOYED BY AND ASSOCIATED WITH THAT CRIMINAL ENTERPRISE, INTENTIONALLY CONDUCTED AND PARTICIPATED IN THE AFFAIRS OF THE CRIMINAL ENTERPRISE BY PARTICIPATING IN A PATTERN OF CRIMINAL ACTIVITY, AS FOLLOWS:

THE CRIMINAL ENTERPRISE

THE DEFENDANTS, CYRUS IRANI, SAUL SALAMA, CLARK

W. BRUNER, CLARK O. BRUNER, CHRISTOPHER BRUNER,  
CASSONDRAS MITH- LUTTMAN, MICHAEL GALLAGHER, JULIO  
ALVARENGA, ANDRES ARRIAGA, JEFFREY METELITZ, THOMAS  
CORTESE, JIMMY JOSEPH, JOHNSON MATHEW, MICHAEL  
GALOYAN, RICHARD VANDERWYK, DAVID CHANG, AND SALLY  
MEDINA-CABELLO, ALONG WITH OTHER PERSONS KNOWN AND  
UNKNOWN, WERE MEMBERS OF AN ENTERPRISE WHICH SHARED  
A COMMON PURPOSE OF ENGAGING IN CRIMINAL CONDUCT,  
AND WERE ASSOCIATED IN A STRUCTURE THAT WAS DISTINCT  
FROM THE PATTERN OF CRIMINAL ACTIVITY, IN THAT EACH  
PARTICIPANT HAS A SPECIALIZED ROLE WITHIN THE  
GAMBLING OPERATION, AND THAT HAD A CONTINUITY OF  
EXISTENCE, STRUCTURE AND CRIMINAL PURPOSE BEYOND THE  
SCOPE OF INDIVIDUAL CRIMINAL INCIDENTS. THE  
DEFENDANTS WERE MEMBERS AND ASSOCIATES OF AN  
ORGANIZATION THAT OPERATED AN UNLAWFUL SPORTS  
GAMBLING ENTERPRISE, AN ORGANIZED CRIMINAL GROUP  
THAT CONSTITUTED A CRIMINAL ENTERPRISE AS THAT TERM  
IS DEFINED IN PENAL LAW SECTION 460.10 SUBSECTION 3.  
  
THE PURPOSE AND STRUCTURE OF THE CRIMINAL ENTERPRISE  
  
THE COMMON PURPOSE OF THE MEMBERS AND ASSOCIATES OF  
THE GAMBLING OPERATION WAS TO ENGAGE IN CRIMINAL

CONDUCT AND TO ACQUIRE MONEY ILLEGALLY THROUGH THE PROMOTION OF GAMBLING ACTIVITY, INCLUDING WAGERS ON SPORTS. THIS GAMBLING ENTERPRISE CONSISTED OF THE FOLLOWING INDIVIDUALS WHO COORDINATED TOGETHER IN ORDER TO ACQUIRE MONEY ILLEGALLY THROUGH THE PROMOTION OF GAMBLING ACTIVITY:

CYRUS IRANI WAS THE BOOKMAKER IN THIS OPERATION. SAUL SALAMA, CLARK W. BRUNER, CLARK O. BRUNER, CHRISTOPHER BRUNER, CASSONDRRA SMITH-LUTTMAN, MICHAEL GALLAGHER, JULIO ALVARENGA, ANDRES ARRIAGA, JEFFREY METELITZ, THOMAS CORTESE, JIMMY JOSEPH, JOHNSON MATHEW, AND MICHAEL GALOYAN WERE AGENTS IN THIS ORGANIZATION WHO RECRUITED BETTORS, MAINTAINED EXISTING BETTORS, COLLECTED GAMBLING LOSSES AND PAID OUT WINNINGS RESULTING FROM BETS PLACED WITH THE ENTERPRISE. RICHARD VANDERWYK, AND DAVID CHANG WERE MONEY COLLECTORS, MONEY DISTRIBUTORS AND BANKS IN THIS ORGANIZATION WHO COLLECTED AND DISTRIBUTED MONEY AMONG THE PARTICIPANTS OF THIS ENTERPRISE AND HELD LARGE SUMS OF CASH FOR THE ADVANCEMENT OF THE BUSINESS. SALLY MEDINA-CABELLO WAS THE RECORD KEEPER, ACCOUNT MANAGER, AND MAINTAINED THE WEBSITE FOR THE ADVANCEMENT OF THE BUSINESS.

THIS GAMBLING ENTERPRISE CONDUCTED THIS GAMBLING BUSINESS IN THE FORM OF A SPORTS GAMBLING OPERATION, AS FOLLOWS:

BETS WERE ACCEPTED BY THIS GAMBLING OPERATION ON VARIOUS SPORTING EVENTS, INCLUDING PROFESSIONAL AND COLLEGE BASKETBALL, FOOTBALL, HOCKEY AND BASEBALL, PRIMARILY THROUGH A TOLL-FREE NUMBER, ACCESSIBLE FROM TELEPHONES LOCATED IN QUEENS COUNTY AND ELSEWHERE, AND THROUGH THE INTERNET WEBSITE 365ACTION.COM WHICH WAS ACCESSIBLE FROM COMPUTERS CONNECTED TO THE INTERNET IN QUEENS COUNTY AND ELSEWHERE.

THIS INTERNET WEBSITE AND THE TOLL FREE TELEPHONE NUMBER WERE WIRE ROOMS WHERE WAGERS WERE ACCEPTED AND GAMBLING ACCOUNTS MAINTAINED. AT VARIOUS TIMES RELEVANT TO THIS INDICTMENT LARGE SUMS OF CASH WERE COLLECTED, TRANSPORTED AND DISTRIBUTED BY MEMBERS OF THE ENTERPRISE IN ORDER FOR THE CRIMINAL BUSINESS TO OPERATE AND PROFIT IN QUEENS COUNTY AND ELSEWHERE.

#### PATTERN OF CRIMINAL ACTIVITY

DURING THE PERIOD OF THESE OFFENSES, AS INDICATED BELOW, EACH OF THE DEFENDANTS, WITH INTENT TO PARTICIPATE IN

AND ADVANCE THE AFFAIRS OF THE CRIMINAL ENTERPRISE,  
ENGAGED IN CONDUCT CONSTITUTING, OR WAS CRIMINALLY  
LIABLE FOR, THREE OR MORE OF THE FOLLOWING CRIMINAL  
ACTS INCLUDED WITHIN AN ESTABLISHED PATTERN OF  
CRIMINAL ACTIVITY:

PATTERN ACT 1

THE DEFENDANTS CYRUS IRANI, SAUL SALAMA, CLARK W.  
BRUNER, CLARK O. BRUNER, CHRISTOPHER BRUNER, MICHAEL  
GALLAGHER, ANDRES ARRIAGA, JEFFREY METELITZ, THOMAS  
CORTESE, JOHNSON MATHEW, MICHAEL GALOYAN, RICHARD  
VANDERWYK, AND DAVID CHANG, ACTING IN CONCERT,  
COMMITTED THE CRIME OF MONEY LAUNDERING IN THE FIRST  
DEGREE, IN VIOLATION OF PENAL LAW SECTION 470.20  
SUBDIVISION ONE, (B) (I) (A) (III), IN THAT ON OR ABOUT JANUARY  
3, 2013 THROUGH ON OR ABOUT SEPTEMBER 8, 2015, IN THE  
COUNTY OF QUEENS AND ELSEWHERE, THEY, KNOWING THAT  
PROPERTY INVOLVED IN ONE OR MORE FINANCIAL  
TRANSACTIONS REPRESENTED THE PROCEEDS OF A CLASS A, B,  
OR C FELONY, OR OF A CRIME IN ANY OTHER JURISDICTION THAT  
IS OR WOULD BE A CLASS A, B, OR C FELONY UNDER THE LAWS  
OF THIS STATE, CONDUCTED ONE OR MORE SUCH FINANCIAL  
TRANSACTIONS WHICH IN FACT INVOLVED THE PROCEEDS OF

ANY SUCH FELONY WITH INTENT TO PROMOTE THE CARRYING  
ON OF SPECIFIED CRIMINAL CONDUCT AND THE TOTAL VALUE  
OF THE PROPERTY INVOLVED IN SUCH FINANCIAL  
TRANSACTIONS EXCEEDED ONE MILLION DOLLARS.

PATTERN ACT 2

THE DEFENDANTS, CYRUS IRANI AND JOHNSON MATHEW,  
ACTING IN CONCERT, COMMITTED THE CRIME OF MONEY  
LAUNDERING IN THE SECOND DEGREE IN VIOLATION OF PENAL  
LAW SECTION 470.15(1) (B)(I)(A)(III), IN THAT ON OR ABOUT AND  
BETWEEN JANUARY 3, 2013 AND JANUARY 27, 2014, IN THE  
COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT THE  
PROPERTY INVOLVED IN ONE OR MORE FINANCIAL  
TRANSACTIONS REPRESENTED THE PROCEEDS OF SPECIFIED  
CRIMINAL CONDUCT, THEY CONDUCTED ONE OR MORE SUCH  
FINANCIAL TRANSACTIONS WHICH IN FACT INVOLVED THE  
PROCEEDS OF SPECIFIED CRIMINAL CONDUCT WITH INTENT TO  
PROMOTE THE CARRYING ON OF SPECIFIED CRIMINAL CONDUCT  
AND THE TOTAL VALUE OF THE PROPERTY INVOLVED IN SUCH  
TRANSACTIONS EXCEEDS \$100,000.

PATTERN ACT 3

THE DEFENDANTS CYRUS IRANI, SAUL SALAMA, CLARK W.



BRUNER, CLARK O. BRUNER, CHRISTOPHER BRUNER,  
CASSONDRAS MITH- LUTTMAN, MICHAEL GALLAGHER, JULIO  
ALVARENGA, ANDRES ARRIAGA, JEFFREY METELITZ, THOMAS  
CORTESE, JIMMY JOSEPH, JOHNSON MATHEW, MICHAEL  
GALOYAN, RICHARD VANDERWYK, DAVID CHANG, AND SALLY  
MEDINA-CABELLO, COMMITTED THE CRIME OF CONSPIRACY IN  
THE FIFTH DEGREE, IN VIOLATION OF PENAL LAW SECTION 105.05  
SUBDIVISION ONE, IN THAT ON OR ABOUT JANUARY 3, 2013 AND  
BETWEEN SEPTEMBER 8, 2015, IN THE COUNTY OF QUEENS AND  
ELSEWHERE, WITH INTENT THAT CONDUCT CONSTITUTING A  
FELONY, TO WIT: PROMOTING GAMBLING IN THE FIRST DEGREE  
BE PERFORMED, AGREED WITH ONE OR MORE PERSONS TO  
ENGAGE IN OR CAUSE THE PERFORMANCE OF SUCH CONDUCT.

OVERT ACTS:

IN FURTHERANCE OF SAID CONSPIRACY AND TO EFFECT THE  
OBJECTS THEREOF, AND DURING THE COURSE THEREOF, THE  
FOLLOWING OVERT ACTS, AMONG OTHERS, WERE COMMITTED:

ON FEBRUARY 17, 2015, MICHAEL GALOYAN DELIVERED  
GAMBLING PROCEEDS FROM INTERNET GAMBLING IN QUEENS  
COUNTY.

THE DEFENDANTS, CYRUS IRANI, JOHNSON MATHEW, JIMMY JOSEPH, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT FEBRUARY 24, 2014, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 5

THE DEFENDANTS, CYRUS IRANI AND MICHAEL GALOYAN, ACTING IN CONCERT, COMMITTED THE CRIME COMMITTED THE CRIME OF MONEY LAUNDERING COMMITTED THE CRIME OF MONEY IN THE THIRD DEGREE, IN VIOLATION OF PENAL LAW SECTION 470.10(1)(B)(I)(A)(III), IN THAT ON OR ABOUT MARCH 5, 2014 AND JUNE 20, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT THE PROPERTY INVOLVED ONE OR MORE FINANCIAL TRANSACTIONS REPRESENTS THE PROCEEDS OF CRIMINAL CONDUCT, THEY CONDUCTED ONE OR MORE SUCH FINANCIAL TRANSACTIONS WHICH IN FACT INVOLVED THE

PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT AND THE TOTAL VALUE OF SUCH PROPERTY INVOLVED IN SUCH FINANCIAL TRANSACTION OR TRANSACTIONS EXCEEDED \$50,000.

PATTERN ACT 6

THE DEFENDANTS, CYRUS IRANI AND MICHAEL GALOYAN, COMMITTED THE CRIME OF CONSPIRACY IN THE FIFTH DEGREE IN VIOLATION OF PENAL LAW SECTION 105.05(1), IN THAT, ON OR ABOUT MARCH 5, 2014 AND JUNE 30, 2014, IN THE COUNTY OF QUEENS AND ELSEWHERE, WITH INTENT THAT CONDUCT CONSTITUTING A FELONY, TO WIT: PROMOTING GAMBLING IN THE FIRST DEGREE BE PERFORMED, AGREED WITH ONE OR MORE PERSONS TO ENGAGE IN OR CAUSE THE PERFORMANCE OF SUCH CONDUCT.

OVERT ACTS:

IN FURTHERANCE OF SAID CONSPIRACY AND TO EFFECT THE OBJECTS THEREOF, AND DURING THE COURSE THEREOF, THE FOLLOWING OVERT ACTS, AMONG OTHERS, WERE COMMITTED: ON APRIL 8, 2014, MICHAEL GALOYAN SPOKE TO CYRUS IRANI FROM QUEENS COUNTY, NEW YORK USING TELEPHONE NUMBER (718) 721-7513 TO DISCUSS CUSTOMER K604 AND THEN DEPOSITED

\$5,000 CASH INTO CYRUS' BANK OF AMERICA ACCOUNT FROM  
THE FOREST HILLS, QUEENS BRANCH.

PATTERN ACT 7

THE DEFENDANTS, CYRUS IRANI AND ANDRES ARRIAGA, ACTING  
IN CONCERT WITH OTHERS, COMMITTED THE CRIME COMMITTED  
THE CRIME OF MONEY LAUNDERING IN THE FOURTH DEGREE, IN  
VIOLATION OF PENAL LAW SECTION 470.05(2)(A)(I)(B), IN THAT ON  
OR ABOUT MARCH 7, 2014, IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY  
INSTRUMENTS REPRESENTED THE PROCEEDS OF SPECIFIED  
CRIMINAL CONDUCT, THEY TRANSPORTED, TRANSMITTED OR  
TRANSFERRED ON ONE OR MORE OCCASIONS, MONETARY  
INSTRUMENTS WHICH IN FACT REPRESENTED THE PROCEEDS OF  
SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE  
CARRYING ON OF CRIMINAL CONDUCT AND THE VALUE OF SUCH  
MONETARY INSTRUMENTS EXCEEDED \$10,000.

PATTERN ACT 8

THE DEFENDANTS, CYRUS IRANI AND JEFFREY METELITZ,  
ACTING IN CONCERT, COMMITTED THE CRIME COMMITTED THE  
CRIME OF MONEY LAUNDERING IN THE FOURTH DEGREE, IN  
VIOLATION OF PENAL LAW SECTION 470.05(2)(A)(I)(B), IN THAT ON

OR ABOUT MARCH 27, 2014, IN THE COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, THEY TRANSPORTED, TRANSMITTED OR TRANSFERRED ON ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT AND THE VALUE OF SUCH MONETARY INSTRUMENTS EXCEEDED \$10,000.

PATTERN ACT 9

THE DEFENDANTS, CYRUS IRANI AND DAVID CHANG, ACTING IN CONCERT, COMMITTED THE CRIME COMMITTED THE CRIME OF MONEY LAUNDERING IN THE FOURTH DEGREE, IN VIOLATION OF PENAL LAW SECTION 470.05(2)(A)(I)(B), IN THAT ON OR ABOUT MARCH 28, 2014, IN THE COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, THEY TRANSPORTED, TRANSMITTED OR TRANSFERRED ON ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT AND THE VALUE OF SUCH

MONETARY INSTRUMENTS EXCEEDED \$10,000.

PATTERN ACT 10

THE DEFENDANTS, CYRUS IRANI, JOHNSON MATHEW, JIMMY JOSEPH, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT APRIL 7, 2014, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 11

THE DEFENDANTS, CYRUS IRANI, JOHNSON MATHEW, JIMMY JOSEPH, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT APRIL 9, 2014, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN

BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING  
MORE THAN \$5,000.

PATTERN ACT 12

THE DEFENDANTS, CYRUS IRANI AND SAUL SALAMA, ACTING IN  
CONCERT, COMMITTED THE CRIME COMMITTED THE CRIME OF  
MONEY LAUNDERING IN THE FOURTH DEGREE, IN VIOLATION OF  
PENAL LAW SECTION 470.05(2)(A)(I)(B), IN THAT ON OR ABOUT  
APRIL 10, 2014, IN THE COUNTY OF QUEENS AND ELSEWHERE,  
KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS  
REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL  
CONDUCT, THEY TRANSPORTED, TRANSMITTED OR  
TRANSFERRED ON ONE OR MORE OCCASIONS, MONETARY  
INSTRUMENTS WHICH IN FACT REPRESENTED THE PROCEEDS OF  
SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE  
CARRYING ON OF CRIMINAL CONDUCT AND THE VALUE OF SUCH  
MONETARY INSTRUMENTS EXCEEDED \$10,000.

PATTERN ACT 13

THE DEFENDANTS, CYRUS IRANI, JOHNSON MATHEW, JIMMY  
JOSEPH, AND SALLY MEDINA-CABELLO ACTING IN CONCERT,  
COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST

DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT APRIL 11, 2014, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 14

THE DEFENDANTS, CYRUS IRANI, JOHNSON MATHEW, JIMMY JOSEPH, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT APRIL 12, 2014, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 15

THE DEFENDANTS, CYRUS IRANI, JOHNSON MATHEW, JIMMY



JOSEPH, AND SALLY MEDINA-CABELLO ACTING IN CONCERT,  
COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST  
DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN  
THAT ON OR ABOUT APRIL 14, 2014, IN THE COUNTY OF QUEENS  
AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED  
FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN  
BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING  
MORE THAN \$5,000.

PATTERN ACT 16

THE DEFENDANTS, CYRUS IRANI, JOHNSON MATHEW, JIMMY  
JOSEPH, AND SALLY MEDINA-CABELLO ACTING IN CONCERT,  
COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST  
DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN  
THAT ON OR ABOUT APRIL 15, 2014, IN THE COUNTY OF QUEENS  
AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED  
FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN  
BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING  
MORE THAN \$5,000.

PATTERN ACT 17

THE DEFENDANTS, CYRUS IRANI, JOHNSON MATHEW, JIMMY JOSEPH, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT APRIL 20, 2014, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 18

THE DEFENDANTS, CYRUS IRANI, JEFFREY METELITZ, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT APRIL 23, 2014, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 19

THE DEFENDANTS, CYRUS IRANI, JEFFREY METELITZ, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT APRIL 26, 2014, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 20

THE DEFENDANTS, CYRUS IRANI, JEFFREY METELITZ, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT APRIL 27, 2014, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 21

THE DEFENDANTS, CYRUS IRANI, JOHNSON MATHEW, JIMMY JOSEPH, JEFFREY METELITZ, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT APRIL 28, 2014, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 22

THE DEFENDANTS, CYRUS IRANI, JOHNSON MATHEW, JIMMY JOSEPH, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT APRIL 29, 2014, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 23

THE DEFENDANTS, CYRUS IRANI, JOHNSON MATHEW, JIMMY JOSEPH, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT MAY 1, 2014, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 24

THE DEFENDANTS, CYRUS IRANI AND THOMAS CORTESE, ACTING IN CONCERT, COMMITTED THE CRIME COMMITTED THE CRIME OF MONEY LAUNDERING COMMITTED THE CRIME OF MONEY IN THE THIRD DEGREE, IN VIOLATION OF PENAL LAW SECTION 470.10(1)(B)(I)(A)(III), IN THAT ON OR ABOUT MAY 2, 2014 AND JUNE 30, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT THE PROPERTY INVOLVED ONE OR MORE FINANCIAL TRANSACTIONS REPRESENTS THE PROCEEDS OF CRIMINAL CONDUCT, THEY CONDUCTED ONE OR MORE SUCH

FINANCIAL TRANSACTIONS WHICH IN FACT INVOLVED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT AND THE TOTAL VALUE OF SUCH PROPERTY INVOLVED IN SUCH FINANCIAL TRANSACTION OR TRANSACTIONS EXCEEDED \$50,000.

PATTERN ACT 25

THE DEFENDANT, CYRUS IRANI, ACTING IN CONCERT WITH OTHERS, COMMITTED THE CRIME COMMITTED THE CRIME OF MONEY LAUNDERING IN THE FOURTH DEGREE, IN VIOLATION OF PENAL LAW SECTION 470.05(2)(A)(I)(B), IN THAT ON OR ABOUT MAY 13, 2014, IN THE COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, THEY TRANSPORTED, TRANSMITTED OR TRANSFERRED ON ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT AND THE VALUE OF SUCH MONETARY INSTRUMENTS EXCEEDED \$10,000.

PATTERN ACT 26

THE DEFENDANT, CYRUS IRANI, ACTING IN CONCERT WITH OTHERS, COMMITTED THE CRIME COMMITTED THE CRIME OF MONEY LAUNDERING IN THE FOURTH DEGREE, IN VIOLATION OF PENAL LAW SECTION 470.05 (1) (A) (II) (A)(B), IN THAT ON OR ABOUT MAY 27, 2014, IN THE COUNTY OF QUEENS AND ELSEWHERE, 1. KNOWING THAT THE PROPERTY INVOLVED IN ONE OR MORE FINANCIAL TRANSACTIONS REPRESENTS THE PROCEEDS OF CRIMINAL CONDUCT: (A) HE CONDUCTED ONE OR MORE SUCH FINANCIAL TRANSACTIONS WHICH IN FACT INVOLVE THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT: (II) KNOWING THAT THE TRANSACTION OR TRANSACTIONS IN WHOLE OR IN PART ARE DESIGNED TO: (A) CONCEAL OR DISGUISE THE NATURE, THE LOCATION, THE SOURCE, THE OWNERSHIP OR THE CONTROL OF THE PROCEEDS OF CRIMINAL CONDUCT; AND (B) THE TOTAL VALUE OF THE PROPERTY INVOLVED IN SUCH FINANCIAL TRANSACTION OR TRANSACTIONS EXCEEDED \$5,000.

PATTERN ACT 27

THE DEFENDANTS, CYRUS IRANI, CLARK W. BRUNER, CLARK O. BRUNER, CHRISTOPHER BRUNER, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW

SECTION 225.10(1), IN THAT ON OR ABOUT SEPTEMBER 21, 2014, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 28

THE DEFENDANTS, CYRUS IRANI, CLARK W. BRUNER, CLARK O. BRUNER, CHRISTOPHER BRUNER, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT SEPTEMBER 27, 2014, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 29

THE DEFENDANTS, CYRUS IRANI, CLARK W. BRUNER, CLARK O. BRUNER, CHRISTOPHER BRUNER, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING



GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT SEPTEMBER 28, 2014, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 30

THE DEFENDANTS, CYRUS IRANI, CLARK W. BRUNER, CLARK O. BRUNER, CHRISTOPHER BRUNER, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT OCTOBER 4, 2014, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 31

THE DEFENDANTS, CYRUS IRANI, CLARK W. BRUNER, CLARK O.

BRUNER, CHRISTOPHER BRUNER, AND SALLY MEDINA-CABELLO  
ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING  
GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW  
SECTION 225.10(1), IN THAT ON OR ABOUT OCTOBER 5, 2014, IN  
THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY  
ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT  
THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE  
BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 32

THE DEFENDANTS, CYRUS IRANI, CLARK W. BRUNER, AND CLARK  
O. BRUNER, ACTING IN CONCERT, COMMITTED THE CRIME  
COMMITTED THE CRIME OF MONEY LAUNDERING IN THE  
FOURTH DEGREE, IN VIOLATION OF PENAL LAW SECTION  
470.05(2)(A)(I)(B), IN THAT ON OR ABOUT OCTOBER 10, 2014, IN THE  
COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT ONE OR  
MORE MONETARY INSTRUMENTS REPRESENTED THE PROCEEDS  
OF SPECIFIED CRIMINAL CONDUCT, THEY TRANSPORTED,  
TRANSMITTED OR TRANSFERRED ON ONE OR MORE OCCASIONS,  
MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED THE  
PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO  
PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT AND THE

VALUE OF SUCH MONETARY INSTRUMENTS EXCEEDED \$10,000.

PATTERN ACT 33

THE DEFENDANTS, CYRUS IRANI, CLARK W. BRUNER, CLARK O. BRUNER, CHRISTOPHER BRUNER, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT OCTOBER 11, 2014, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 34

THE DEFENDANTS, CYRUS IRANI, CLARK W. BRUNER, CLARK O. BRUNER, CHRISTOPHER BRUNER, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT OCTOBER 12, 2014, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING

ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT  
THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE  
BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 35

THE DEFENDANTS, CYRUS IRANI, JIMMY JOSEPH, JOHNSON  
MATHEW, JULIO ALVARENGA, ANDRES ARRIAGA, JEFFREY  
METELITZ, SAUL SALAMA, AND SALLY MEDINA-CABELLO  
ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING  
GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW  
SECTION 225.10(1), IN THAT ON OR ABOUT OCTOBER 13, 2014, IN  
THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY  
ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT  
THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE  
BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 36

THE DEFENDANTS, CYRUS IRANI, JIMMY JOSEPH, JOHNSON  
MATHEW, JULIO ALVARENGA, ANDRES ARRIAGA, JEFFREY  
METELITZ, SAUL SALAMA, AND SALLY MEDINA-CABELLO  
ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING  
GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW

SECTION 225.10(1), IN THAT ON OR ABOUT OCTOBER 14, 2014, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 37

THE DEFENDANTS, CYRUS IRANI AND SAUL SALAMA, ACTING IN CONCERT, COMMITTED THE CRIME COMMITTED THE CRIME OF MONEY LAUNDERING IN THE FOURTH DEGREE, IN VIOLATION OF PENAL LAW SECTION 470.05(2)(A)(I)(B), IN THAT ON OR ABOUT OCTOBER 14, 2014, IN THE COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, THEY TRANSPORTED, TRANSMITTED OR TRANSFERRED ON ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT AND THE VALUE OF SUCH MONETARY INSTRUMENTS EXCEEDED \$10,000.

PATTERN ACT 38

THE DEFENDANTS, CYRUS IRANI, JIMMY JOSEPH, JOHNSON  
MATHEW, JULIO ALVARENGA, ANDRES ARRIAGA, JEFFREY  
METELITZ, SAUL SALAMA, AND SALLY MEDINA-CABELLO  
ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING  
GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW  
SECTION 225.10(1), IN THAT ON OR ABOUT OCTOBER 15, 2014, IN  
THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY  
ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT  
THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE  
BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 39

THE DEFENDANTS, CYRUS IRANI, JIMMY JOSEPH, JOHNSON  
MATHEW, JULIO ALVARENGA, ANDRES ARRIAGA, JEFFREY  
METELITZ, SAUL SALAMA, AND SALLY MEDINA-CABELLO  
ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING  
GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW  
SECTION 225.10(1), IN THAT ON OR ABOUT OCTOBER 16, 2014, IN  
THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY  
ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT

THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE  
BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 40

THE DEFENDANTS, CYRUS IRANI, JIMMY JOSEPH, JOHNSON  
MATHEW, JEFFREY METELITZ, SAUL SALAMA, AND SALLY  
MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME  
OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION  
OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT  
OCTOBER 17, 2014, IN THE COUNTY OF QUEENS AND ELSEWHERE,  
THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL  
GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE  
EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE  
MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 41

THE DEFENDANTS, CYRUS IRANI AND SAUL SALAMA, ACTING IN  
CONCERT, COMMITTED THE CRIME COMMITTED THE CRIME OF  
MONEY LAUNDERING IN THE FOURTH DEGREE, IN VIOLATION OF  
PENAL LAW SECTION 470.05(2)(A)(I)(B), IN THAT ON OR ABOUT  
OCTOBER 17, 2014, IN THE COUNTY OF QUEENS AND ELSEWHERE,  
KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS  
REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL

CONDUCT, THEY TRANSPORTED, TRANSMITTED OR  
TRANSFERRED ON ONE OR MORE OCCASIONS, MONETARY  
INSTRUMENTS WHICH IN FACT REPRESENTED THE PROCEEDS OF  
SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE  
CARRYING ON OF CRIMINAL CONDUCT AND THE VALUE OF SUCH  
MONETARY INSTRUMENTS EXCEEDED \$10,000.

PATTERN ACT 42

THE DEFENDANTS, CYRUS IRANI, JIMMY JOSEPH, JOHNSON  
MATHEW, JULIO ALVARENGA, ANDRES ARRIAGA, JEFFREY  
METELITZ, SAUL SALAMA, AND SALLY MEDINA-CABELLO  
ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING  
GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW  
SECTION 225.10(1), IN THAT ON OR ABOUT OCTOBER 18, 2014, IN  
THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY  
ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT  
THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE  
BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 43

THE DEFENDANTS, CYRUS IRANI, JIMMY JOSEPH, JOHNSON



MATHEW, JULIO ALVARENGA, ANDRES ARRIAGA, JEFFREY  
METELITZ, SAUL SALAMA, AND SALLY MEDINA-CABELLO  
ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING  
GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW  
SECTION 225.10(1), IN THAT ON OR ABOUT OCTOBER 19, 2014, IN  
THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY  
ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT  
THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE  
BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 44

THE DEFENDANTS, CYRUS IRANI AND SAUL SALAMA, ACTING IN  
CONCERT, COMMITTED THE CRIME COMMITTED THE CRIME OF  
MONEY LAUNDERING IN THE FOURTH DEGREE, IN VIOLATION OF  
PENAL LAW SECTION 470.05(2)(A)(I)(B), IN THAT ON OR ABOUT  
NOVEMBER 21, 2014, IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY  
INSTRUMENTS REPRESENTED THE PROCEEDS OF SPECIFIED  
CRIMINAL CONDUCT, THEY TRANSPORTED, TRANSMITTED OR  
TRANSFERRED ON ONE OR MORE OCCASIONS, MONETARY  
INSTRUMENTS WHICH IN FACT REPRESENTED THE PROCEEDS OF  
SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE

CARRYING ON OF CRIMINAL CONDUCT AND THE VALUE OF SUCH  
MONETARY INSTRUMENTS EXCEEDED \$10,000.

PATTERN ACT 45

THE DEFENDANTS, CYRUS IRANI AND ANDRES ARRIAGA, ACTING  
IN CONCERT WITH OTHERS, COMMITTED THE CRIME COMMITTED  
THE CRIME OF MONEY LAUNDERING IN THE FOURTH DEGREE, IN  
VIOLATION OF PENAL LAW SECTION 470.05(2)(A)(I)(B), IN THAT ON  
OR ABOUT NOVEMBER 21, 2014, IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY  
INSTRUMENTS REPRESENTED THE PROCEEDS OF SPECIFIED  
CRIMINAL CONDUCT, THEY TRANSPORTED, TRANSMITTED OR  
TRANSFERRED ON ONE OR MORE OCCASIONS, MONETARY  
INSTRUMENTS WHICH IN FACT REPRESENTED THE PROCEEDS OF  
SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE  
CARRYING ON OF CRIMINAL CONDUCT AND THE VALUE OF SUCH  
MONETARY INSTRUMENTS EXCEEDED \$10,000.

PATTERN ACT 46

THE DEFENDANTS, CYRUS IRANI AND RICHARD VANDERWYK,  
ACTING IN CONCERT, COMMITTED THE CRIME COMMITTED THE  
CRIME OF MONEY LAUNDERING IN THE FOURTH DEGREE, IN  
VIOLATION OF PENAL LAW SECTION 470.05(2)(A)(I)(B), IN THAT ON

OR ABOUT NOVEMBER 30, 2014 AND DECEMBER 1, 2014, IN THE COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, THEY TRANSPORTED, TRANSMITTED OR TRANSFERRED ON ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT AND THE VALUE OF SUCH MONETARY INSTRUMENTS EXCEEDED \$10,000.

PATTERN ACT 47

THE DEFENDANTS, CYRUS IRANI AND SAUL SALAMA, ACTING IN CONCERT WITH OTHERS, COMMITTED THE CRIME COMMITTED THE CRIME OF MONEY LAUNDERING IN THE FOURTH DEGREE, IN VIOLATION OF PENAL LAW SECTION 470.05(2)(A)(I)(B), IN THAT ON OR ABOUT DECEMBER 10, 2014, IN THE COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, THEY TRANSPORTED, TRANSMITTED OR TRANSFERRED ON ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT AND THE VALUE OF SUCH

MONETARY INSTRUMENTS EXCEEDED \$10,000.

PATTERN ACT 48

THE DEFENDANTS, CYRUS IRANI AND SAUL SALAMA,  
COMMITTED THE CRIME OF CONSPIRACY IN THE FOURTH  
DEGREE IN VIOLATION OF PENAL LAW SECTION 105.10(1), IN THAT  
ON OR ABOUT DECEMBER 19, 2014, AND DECEMBER 20, 2014, IN  
THE COUNTY OF QUEENS AND ELSEWHERE, WITH INTENT THAT  
CONDUCT CONSTITUTING A CLASS C FELONY, TO WIT, MONEY  
LAUNDERING IN THE SECOND DEGREE BE PERFORMED, AGREED  
WITH ONE OR MORE PERSONS TO ENGAGE IN OR CAUSE THE  
PERFORMANCE OF SUCH CONDUCT.

OVERT ACTS:

ON DECEMBER 19, 2014, CYRUS IRANI AND SAUL SALAMA HAD A  
CONVERSATION WHEREIN SAUL AGREED TO DELIVER \$140,000 IN  
CASH TO A MANHATTAN COMIC BOOK COLLECTIBLES STORE.  
ON DECEMBER 20, 2014, SAUL SALAMA DELIVERED THE MONEY.

PATTERN ACT 49

THE DEFENDANTS, CYRUS IRANI AND SAUL SALAMA, ACTING IN  
CONCERT, COMMITTED THE CRIME OF MONEY LAUNDERING IN  
THE SECOND DEGREE IN VIOLATION OF PENAL LAW SECTION

470.15(1)(B)(I)(A)(III), IN THAT ON OR ABOUT DECEMBER 20, 2014, IN THE COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT THE PROPERTY INVOLVED IN ONE OR MORE FINANCIAL TRANSACTIONS REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, THEY CONDUCTED ONE OR MORE SUCH FINANCIAL TRANSACTIONS WHICH IN FACT INVOLVED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT WITH INTENT TO PROMOTE THE CARRYING ON OF SPECIFIED CRIMINAL CONDUCT AND THE TOTAL VALUE OF THE PROPERTY INVOLVED IN SUCH TRANSACTIONS EXCEEDS \$100,000.

PATTERN ACT 50

THE DEFENDANTS, CYRUS IRANI, CLARK W. BRUNER, AND CLARK O. BRUNER, ACTING IN CONCERT, COMMITTED THE CRIME COMMITTED THE CRIME OF MONEY LAUNDERING IN THE FOURTH DEGREE, IN VIOLATION OF PENAL LAW SECTION 470.05(2)(A)(I)(B), IN THAT ON OR ABOUT DECEMBER 29, 2014 AND DECEMBER 31, 2014, IN THE COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, THEY TRANSPORTED, TRANSMITTED OR TRANSFERRED ON ONE OR MORE OCCASIONS, MONETARY

INSTRUMENTS WHICH IN FACT REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT AND THE VALUE OF SUCH MONETARY INSTRUMENTS EXCEEDED \$10,000.

PATTERN ACT 51

THE DEFENDANTS, CYRUS IRANI, THOMAS CORTESE, SAUL SALAMA, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT JANUARY 1, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 52

THE DEFENDANTS, CYRUS IRANI, THOMAS CORTESE, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT JANUARY 2, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE,

THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 53

THE DEFENDANTS, CYRUS IRANI, CLARK W. BRUNER, AND CLARK O. BRUNER, ACTING IN CONCERT, COMMITTED THE CRIME COMMITTED THE CRIME OF MONEY LAUNDERING IN THE FOURTH DEGREE, IN VIOLATION OF PENAL LAW SECTION 470.05(2)(A)(I)(B), IN THAT ON OR ABOUT JANUARY 2, 2015 IN THE COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, THEY TRANSPORTED, TRANSMITTED OR TRANSFERRED ON ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT AND THE VALUE OF SUCH MONETARY INSTRUMENTS EXCEEDED \$10,000.

PATTERN ACT 54

THE DEFENDANTS, CYRUS IRANI, THOMAS CORTESE, AND SALLY

MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT JANUARY 3, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 55

THE DEFENDANTS, CYRUS IRANI, THOMAS CORTESE, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT JANUARY 4, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 56

THE DEFENDANTS, CYRUS IRANI AND JOHNSON MATHEW, ACTING IN CONCERT, COMMITTED THE CRIME COMMITTED THE



CRIME OF MONEY LAUNDERING IN THE FOURTH DEGREE, IN VIOLATION OF PENAL LAW SECTION 470.05(2)(A)(I)(B), IN THAT ON OR ABOUT AND BETWEEN JANUARY 4, 2015 AND JUNE 10, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, THEY TRANSPORTED, TRANSMITTED OR TRANSFERRED ON ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT AND THE VALUE OF SUCH MONETARY INSTRUMENTS EXCEEDED \$10,000.

PATTERN ACT 57

THE DEFENDANTS, CYRUS IRANI, CLARK W. BRUNER, AND CLARK O. BRUNER, ACTING IN CONCERT, COMMITTED THE CRIME COMMITTED THE CRIME OF MONEY LAUNDERING IN THE FOURTH DEGREE, IN VIOLATION OF PENAL LAW SECTION 470.05(2)(A)(I)(B), IN THAT ON OR ABOUT JANUARY 6, 2015 IN THE COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, THEY TRANSPORTED, TRANSMITTED OR TRANSFERRED ON ONE OR MORE OCCASIONS,

MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT AND THE VALUE OF SUCH MONETARY INSTRUMENTS EXCEEDED \$10,000.

PATTERN ACT 58

THE DEFENDANTS, CYRUS IRANI, CLARK W. BRUNER, AND CLARK O. BRUNER, ACTING IN CONCERT, COMMITTED THE CRIME COMMITTED THE CRIME OF MONEY LAUNDERING IN THE FOURTH DEGREE, IN VIOLATION OF PENAL LAW SECTION 470.05(2)(A)(I)(B), IN THAT ON OR ABOUT JANUARY 9, 2015 IN THE COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, THEY TRANSPORTED, TRANSMITTED OR TRANSFERRED ON ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT AND THE VALUE OF SUCH MONETARY INSTRUMENTS EXCEEDED \$10,000.

PATTERN ACT 59

THE DEFENDANTS, CYRUS IRANI, THOMAS CORTESE, AND SALLY

MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT JANUARY 11, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 60

THE DEFENDANTS, CYRUS IRANI, CASSONDRA SMITH-LUTTMAN, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT JANUARY 12, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 61

THE DEFENDANTS, CYRUS IRANI, CASSONDRA SMITH-LUTTMAN,

AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT JANUARY 13, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 62

THE DEFENDANTS, CYRUS IRANI, CLARK W. BRUNER, AND CLARK O. BRUNER, ACTING IN CONCERT, COMMITTED THE CRIME COMMITTED THE CRIME OF MONEY LAUNDERING IN THE FOURTH DEGREE, IN VIOLATION OF PENAL LAW SECTION 470.05(2)(A)(I)(B), IN THAT ON OR ABOUT AND BETWEEN JANUARY 16, 2015 AND JANUARY 26, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, THEY TRANSPORTED, TRANSMITTED OR TRANSFERRED ON ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE

CARRYING ON OF CRIMINAL CONDUCT AND THE VALUE OF SUCH  
MONETARY INSTRUMENTS EXCEEDED \$10,000.

PATTERN ACT 63

THE DEFENDANTS, CYRUS IRANI, CASSONDRA SMITH-LUTTMAN,  
AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED  
THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN  
VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR  
ABOUT JANUARY 17, 2015, IN THE COUNTY OF QUEENS AND  
ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED  
FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN  
BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING  
MORE THAN \$5,000.

PATTERN ACT 64

THE DEFENDANTS, CYRUS IRANI, JULIO ALVARENGA, ANDRES  
ARRIAGA, AND SALLY MEDINA-CABELLO ACTING IN CONCERT,  
COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST  
DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN  
THAT ON OR ABOUT JANUARY 19, 2015, IN THE COUNTY OF  
QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND

PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING  
IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING  
MORE THAN \$5,000.

PATTERN ACT 65

THE DEFENDANTS, CYRUS IRANI, JULIO ALVARENGA, ANDRES  
ARRIAGA, AND SALLY MEDINA-CABELLO ACTING IN CONCERT,  
COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST  
DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN  
THAT ON OR ABOUT JANUARY 20, 2015, IN THE COUNTY OF  
QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND  
PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING  
IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING  
MORE THAN \$5,000.

PATTERN ACT 66

THE DEFENDANTS, CYRUS IRANI, JULIO ALVARENGA, ANDRES  
ARRIAGA, CASSONDRA SMITH-LUTTMAN, AND SALLY  
MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME  
OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION  
OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT

JANUARY 24, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE,  
THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL  
GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE  
EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE  
MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 67

THE DEFENDANTS, CYRUS IRANI, JULIO ALVARENGA, ANDRES  
ARRIAGA, AND SALLY MEDINA-CABELLO ACTING IN CONCERT,  
COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST  
DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN  
THAT ON OR ABOUT JANUARY 25, 2015, IN THE COUNTY OF  
QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND  
PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING  
IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING  
MORE THAN \$5,000.

PATTERN ACT 68

THE DEFENDANTS, CYRUS IRANI, JIMMY JOSEPH, JOHNSON  
MATHEW AND SALLY MEDINA-CABELLO ACTING IN CONCERT,  
COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST

DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT JANUARY 26, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 69

THE DEFENDANTS, CYRUS IRANI, JEFFREY METELITZ AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT JANUARY 27, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 70

THE DEFENDANTS, CYRUS IRANI, JIMMY JOSEPH, JOHNSON MATHEW, JEFFREY METELITZ, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING



GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT JANUARY 28, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 71

THE DEFENDANTS, CYRUS IRANI, MICHAEL GALOYAN, JEFFREY METELITZ AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT JANUARY 29, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 72

THE DEFENDANT, CYRUS IRANI, ACTING IN CONCERT WITH

OTHERS, COMMITTED THE CRIME COMMITTED THE CRIME OF MONEY LAUNDERING IN THE FOURTH DEGREE, IN VIOLATION OF PENAL LAW SECTION 470.05 (1) (A) (II) (A)(B), IN THAT ON OR ABOUT JANUARY 29, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, 1. KNOWING THAT THE PROPERTY INVOLVED IN ONE OR MORE FINANCIAL TRANSACTIONS REPRESENTS THE PROCEEDS OF CRIMINAL CONDUCT: (A) HE CONDUCTED ONE OR MORE SUCH FINANCIAL TRANSACTIONS WHICH IN FACT INVOLVE THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT: (II) KNOWING THAT THE TRANSACTION OR TRANSACTIONS IN WHOLE OR IN PART ARE DESIGNED TO: (A) CONCEAL OR DISGUISE THE NATURE, THE LOCATION, THE SOURCE, THE OWNERSHIP OR THE CONTROL OF THE PROCEEDS OF CRIMINAL CONDUCT; AND (B) THE TOTAL VALUE OF THE PROPERTY INVOLVED IN SUCH FINANCIAL TRANSACTION OR TRANSACTIONS EXCEEDED \$5,000.

PATTERN ACT 73

THE DEFENDANTS, CYRUS IRANI AND DAVID CHANG, ACTING IN CONCERT WITH OTHERS, COMMITTED THE CRIME OF MONEY LAUNDERING IN THE SECOND DEGREE IN VIOLATION OF PENAL LAW SECTION 470.15(1)(B)(I)(A)(III), IN THAT ON OR ABOUT AND BETWEEN JANUARY 30, 2015 AND FEBRUARY 2, 2015, IN THE

COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT THE PROPERTY INVOLVED IN ONE OR MORE FINANCIAL TRANSACTIONS REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, THEY CONDUCTED ONE OR MORE SUCH FINANCIAL TRANSACTIONS WHICH IN FACT INVOLVED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT WITH INTENT TO PROMOTE THE CARRYING ON OF SPECIFIED CRIMINAL CONDUCT AND THE TOTAL VALUE OF THE PROPERTY INVOLVED IN SUCH TRANSACTIONS EXCEEDS \$100,000.

PATTERN ACT 74

THE DEFENDANTS, CYRUS IRANI, MICHAEL GALLAGHER, MICHAEL GALOYAN, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT JANUARY 30, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 75

THE DEFENDANTS, CYRUS IRANI, THOMAS CORTESE, MICHAEL GALLAGHER, MICHAEL GALOYAN, SAUL SALAMA, CASSONDRA SMITH-LUTTMAN, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT JANUARY 31, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 76

THE DEFENDANTS, CYRUS IRANI, JULIO ALVARENGA, ANDRES ARRIAGA, CLARK W. BRUNER, CLARK O. BRUNER, CHRISTOPHER BRUNER, THOMAS CORTESE, MICHAEL GALLAGHER, MICHAEL GALOYAN, JOHNSON MATHEW, JIMMY JOSEPH, JEFFREY METELITZ, SAUL SALAMA, CASSONDRA SMITH-LUTTMAN, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT FEBRUARY 1, 2015, IN THE COUNTY OF QUEENS AND

ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 77

THE DEFENDANTS, CYRUS IRANI, CLARK W. BRUNER, CLARK O. BRUNER, CHRISTOPHER BRUNER, MICHAEL GALLAGHER, MICHAEL GALOYAN, JOHNSON MATHEW, JIMMY JOSEPH, JEFFREY METELITZ, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT FEBRUARY 2, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 78

THE DEFENDANTS, CYRUS IRANI, CLARK W. BRUNER, AND RICHARD VANDERWYK, ACTING IN CONCERT WITH OTHERS,

COMMITTED THE CRIME COMMITTED THE CRIME OF MONEY  
LAUNDERING IN THE FOURTH DEGREE, IN VIOLATION OF PENAL  
LAW SECTION 470.05(2)(A)(I)(B), IN THAT ON OR ABOUT  
FEBRUARY 2, 2015 AND FEBRUARY 12, 2015, IN THE COUNTY OF  
QUEENS AND ELSEWHERE, KNOWING THAT ONE OR MORE  
MONETARY INSTRUMENTS REPRESENTED THE PROCEEDS OF  
SPECIFIED CRIMINAL CONDUCT, THEY TRANSPORTED,  
TRANSMITTED OR TRANSFERRED ON ONE OR MORE OCCASIONS,  
MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED THE  
PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO  
PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT AND THE  
VALUE OF SUCH MONETARY INSTRUMENTS EXCEEDED \$10,000.

PATTERN ACT 79

THE DEFENDANTS, CYRUS IRANI, CLARK W. BRUNER, CLARK O.  
BRUNER, CHRISTOPHER BRUNER, MICHAEL GALLAGHER,  
JOHNSON MATHEW, JIMMY JOSEPH, AND SALLY  
MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME  
OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION  
OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT  
FEBRUARY 3, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE,  
THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL  
GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE

EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE  
MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 80

THE DEFENDANTS, CYRUS IRANI, CLARK W. BRUNER, CLARK O.  
BRUNER, CHRISTOPHER BRUNER, MICHAEL GALLAGHER,  
MICHAEL GALOYAN, JOHNSON MATHEW, JIMMY JOSEPH, AND  
SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE  
CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN  
VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR  
ABOUT FEBRUARY 4, 2015, IN THE COUNTY OF QUEENS AND  
ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED  
FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN  
BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING  
MORE THAN \$5,000.

PATTERN ACT 81

THE DEFENDANTS, CYRUS IRANI, CLARK W. BRUNER, CLARK O.  
BRUNER, CHRISTOPHER BRUNER, MICHAEL GALLAGHER,  
MICHAEL GALOYAN, JOHNSON MATHEW, JIMMY JOSEPH, AND  
SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE

CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT FEBRUARY 5, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 82

THE DEFENDANTS, CYRUS IRANI, CLARK W. BRUNER, CLARK O. BRUNER, CHRISTOPHER BRUNER, MICHAEL GALLAGHER, MICHAEL GALOYAN, JOHNSON MATHEW, JIMMY JOSEPH, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT FEBRUARY 6, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.



PATTERN ACT 83

THE DEFENDANTS, CYRUS IRANI, JULIO ALVARENGA, ANDRES  
ARRIAGA, CLARK W. BRUNER, CLARK O. BRUNER, CHRISTOPHER  
BRUNER, THOMAS CORTESE, MICHAEL GALLAGHER, MICHAEL  
GALOYAN, JOHNSON MATHEW, JIMMY JOSEPH, SAUL SALAMA  
AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED  
THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN  
VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR  
ABOUT FEBRUARY 7, 2015, IN THE COUNTY OF QUEENS AND  
ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED  
FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN  
BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING  
MORE THAN \$5,000.

PATTERN ACT 84

THE DEFENDANTS, CYRUS IRANI, MICHAEL GALLAGHER,  
JOHNSON MATHEW, JIMMY JOSEPH, CASSONDRA  
SMITH-LUTTMAN AND SALLY MEDINA-CABELLO ACTING IN  
CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN  
THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION  
225.10(1), IN THAT ON OR ABOUT FEBRUARY 8, 2015, IN THE

COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY  
ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT  
THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE  
BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 85

THE DEFENDANTS, CYRUS IRANI, CASSONDRA SMITH-LUTTMAN  
AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED  
THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN  
VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR  
ABOUT FEBRUARY 9, 2015, IN THE COUNTY OF QUEENS AND  
ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED  
FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN  
BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING  
MORE THAN \$5,000.

PATTERN ACT 86

THE DEFENDANTS, CYRUS IRANI, CLARK W. BRUNER, AND CLARK  
O. BRUNER, ACTING IN CONCERT, COMMITTED THE CRIME  
COMMITTED THE CRIME OF MONEY LAUNDERING IN THE  
FOURTH DEGREE, IN VIOLATION OF PENAL LAW SECTION

470.05(2)(A)(I)(B), IN THAT ON OR ABOUT FEBRUARY 12, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, THEY TRANSPORTED, TRANSMITTED OR TRANSFERRED ON ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT AND THE VALUE OF SUCH MONETARY INSTRUMENTS EXCEEDED \$10,000.

PATTERN ACT 87

THE DEFENDANTS, CYRUS IRANI, CASSONDRA SMITH-LUTTMAN AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT FEBRUARY 14, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 88

THE DEFENDANTS, CYRUS IRANI AND SAUL SALAMA, ACTING IN CONCERT, COMMITTED THE CRIME COMMITTED THE CRIME OF MONEY LAUNDERING IN THE FOURTH DEGREE, IN VIOLATION OF PENAL LAW SECTION 470.05(2)(A)(I)(B), IN THAT ON OR ABOUT FEBRUARY 17, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, THEY TRANSPORTED, TRANSMITTED OR TRANSFERRED ON ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT AND THE VALUE OF SUCH MONETARY INSTRUMENTS EXCEEDED \$10,000.

PATTERN ACT 89

THE DEFENDANTS, CYRUS IRANI, CLARK O. BRUNER, CLARK W. BRUNER, CHRISTOPHER BRUNER AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT FEBRUARY 23, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY

ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT  
THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE  
BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 90

THE DEFENDANTS, CYRUS IRANI, CLARK O. BRUNER, CLARK W.  
BRUNER, CHRISTOPHER BRUNER AND SALLY MEDINA-CABELLO  
ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING  
GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW  
SECTION 225.10(1), IN THAT ON OR ABOUT FEBRUARY 24, 2015, IN  
THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY  
ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT  
THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE  
BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 91

THE DEFENDANTS, CYRUS IRANI, CLARK O. BRUNER, CLARK W.  
BRUNER, CHRISTOPHER BRUNER AND SALLY MEDINA-CABELLO  
ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING  
GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW

SECTION 225.10(1), IN THAT ON OR ABOUT FEBRUARY 25, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 92

THE DEFENDANTS, CYRUS IRANI, CLARK O. BRUNER, CLARK W. BRUNER, CHRISTOPHER BRUNER AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT FEBRUARY 26, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 93

THE DEFENDANTS, CYRUS IRANI, CLARK O. BRUNER, CLARK W. BRUNER, CHRISTOPHER BRUNER AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING

GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT FEBRUARY 27, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 94

THE DEFENDANTS, CYRUS IRANI, CLARK O. BRUNER, CLARK W. BRUNER, CHRISTOPHER BRUNER, CASSONDRA SMITH-LUTTMAN, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT FEBRUARY 28 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 95

THE DEFENDANTS, CYRUS IRANI, CLARK O. BRUNER, CLARK W. BRUNER, CHRISTOPHER BRUNER, SAUL SALAMA, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT MARCH 1, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 96

THE DEFENDANTS, CYRUS IRANI, SAUL SALAMA, CLARK O. BRUNER, CLARK W. BRUNER, CHRISTOPHER BRUNER, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT MARCH 2, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.



PATTERN ACT 97

THE DEFENDANTS, CYRUS IRANI, CLARK O. BRUNER, CLARK W. BRUNER, CHRISTOPHER BRUNER, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT MARCH 3, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 98

THE DEFENDANTS, CYRUS IRANI, CLARK O. BRUNER, CLARK W. BRUNER, CHRISTOPHER BRUNER, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT MARCH 4, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 99

THE DEFENDANTS, CYRUS IRANI, CLARK O. BRUNER, CLARK W. BRUNER, CHRISTOPHER BRUNER, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT MARCH 5, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 100

THE DEFENDANTS, CYRUS IRANI, CLARK W. BRUNER, AND CLARK O. BRUNER, ACTING IN CONCERT, COMMITTED THE CRIME COMMITTED THE CRIME OF MONEY LAUNDERING IN THE FOURTH DEGREE, IN VIOLATION OF PENAL LAW SECTION 470.05(2)(A)(I)(B), IN THAT ON OR ABOUT MARCH 10, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, THEY TRANSPORTED,

TRANSMITTED OR TRANSFERRED ON ONE OR MORE OCCASIONS,  
MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED THE  
PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO  
PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT AND THE  
VALUE OF SUCH MONETARY INSTRUMENTS EXCEEDED \$10,000.

PATTERN ACT 101

THE DEFENDANTS, CYRUS IRANI, CASSONDRA SMITH-LUTTMAN,  
AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED  
THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN  
VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR  
ABOUT MARCH 11, 2015, IN THE COUNTY OF QUEENS AND  
ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED  
FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN  
BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING  
MORE THAN \$5,000.

PATTERN ACT 102

THE DEFENDANTS, CYRUS IRANI, THOMAS CORTESE, AND SALLY  
MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME  
OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION  
OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT MARCH

20, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 103

THE DEFENDANTS, CYRUS IRANI, CASSONDRA SMITH-LUTTMAN, THOMAS CORTESE, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT MARCH 22, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 104

THE DEFENDANTS, CYRUS IRANI, CASSONDRA SMITH-LUTTMAN, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN

VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT MARCH 25, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 105

THE DEFENDANTS, CYRUS IRANI, THOMAS CORTESE, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT MARCH 26, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 106

THE DEFENDANTS, CYRUS IRANI, THOMAS CORTESE, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION

OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT MARCH 27, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 107

THE DEFENDANTS, CYRUS IRANI, THOMAS CORTESE, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT MARCH 28, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 108

THE DEFENDANTS, CYRUS IRANI, THOMAS CORTESE, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION

OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT MARCH 29, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 109

THE DEFENDANTS, CYRUS IRANI, CLARK W. BRUNER, CHRISTOPHER BRUNER, AND RICHARD VANDERWYK, ACTING IN CONCERT, COMMITTED THE CRIME COMMITTED THE CRIME OF MONEY LAUNDERING IN THE FOURTH DEGREE, IN VIOLATION OF PENAL LAW SECTION 470.05(2)(A)(I)(B), IN THAT ON OR ABOUT APRIL 7, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, THEY TRANSPORTED, TRANSMITTED OR TRANSFERRED ON ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT AND THE VALUE OF SUCH MONETARY INSTRUMENTS EXCEEDED \$10,000.

PATTERN ACT 110

THE DEFENDANTS, CYRUS IRANI, CLARK W. BRUNER, AND RICHARD VANDERWYK, ACTING IN CONCERT WITH OTHERS, COMMITTED THE CRIME COMMITTED THE CRIME OF MONEY LAUNDERING IN THE FOURTH DEGREE, IN VIOLATION OF PENAL LAW SECTION 470.05(2)(A)(I)(B), IN THAT ON OR ABOUT APRIL 17, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, THEY TRANSPORTED, TRANSMITTED OR TRANSFERRED ON ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT AND THE VALUE OF SUCH MONETARY INSTRUMENTS EXCEEDED \$10,000.

PATTERN ACT 111

THE DEFENDANTS, CYRUS IRANI, CLARK W. BRUNER, AND CLARK O. BRUNER, ACTING IN CONCERT, COMMITTED THE CRIME COMMITTED THE CRIME OF MONEY LAUNDERING IN THE FOURTH DEGREE, IN VIOLATION OF PENAL LAW SECTION 470.05(2)(A)(I)(B), IN THAT ON OR ABOUT MAY 4, 2015, IN THE



COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, THEY TRANSPORTED, TRANSMITTED OR TRANSFERRED ON ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT AND THE VALUE OF SUCH MONETARY INSTRUMENTS EXCEEDED \$10,000.

PATTERN ACT 112

THE DEFENDANTS, CYRUS IRANI AND MICHAEL GALLAGHER, ACTING IN CONCERT, COMMITTED THE CRIME COMMITTED THE CRIME OF MONEY LAUNDERING IN THE FOURTH DEGREE, IN VIOLATION OF PENAL LAW SECTION 470.05(2)(A)(I)(B), IN THAT ON OR ABOUT MAY 15, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, THEY TRANSPORTED, TRANSMITTED OR TRANSFERRED ON ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT AND THE VALUE OF SUCH MONETARY INSTRUMENTS EXCEEDED \$10,000.

PATTERN ACT 113

THE DEFENDANTS, CYRUS IRANI, CLARK W. BRUNER, AND DAVID CHANG, ACTING IN CONCERT WITH OTHERS, COMMITTED THE CRIME COMMITTED THE CRIME OF MONEY LAUNDERING IN THE FOURTH DEGREE, IN VIOLATION OF PENAL LAW SECTION 470.05(2)(A)(I)(B), IN THAT ON OR ABOUT MAY 29, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, THEY TRANSPORTED, TRANSMITTED OR TRANSFERRED ON ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT AND THE VALUE OF SUCH MONETARY INSTRUMENTS EXCEEDED \$10,000.

PATTERN ACT 114

THE DEFENDANTS, CYRUS IRANI AND SAUL SALAMA, ACTING IN CONCERT WITH OTHERS, COMMITTED THE CRIME COMMITTED THE CRIME OF MONEY LAUNDERING IN THE FOURTH DEGREE, IN VIOLATION OF PENAL LAW SECTION 470.05(2)(A)(I)(B), IN THAT ON OR ABOUT JUNE 4, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY

INSTRUMENTS REPRESENTED THE PROCEEDS OF SPECIFIED  
CRIMINAL CONDUCT, THEY TRANSPORTED, TRANSMITTED OR  
TRANSFERRED ON ONE OR MORE OCCASIONS, MONETARY  
INSTRUMENTS WHICH IN FACT REPRESENTED THE PROCEEDS OF  
SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE  
CARRYING ON OF CRIMINAL CONDUCT AND THE VALUE OF SUCH  
MONETARY INSTRUMENTS EXCEEDED \$10,000.

PATTERN ACT 115

THE DEFENDANTS, CYRUS IRANI, SAUL SALAMA, AND SALLY  
MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME  
OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION  
OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT JUNE 28,  
2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY  
KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL  
GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE  
EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE  
MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 116

THE DEFENDANTS, CYRUS IRANI, CLARK W. BRUNER, AND  
RICHARD VANDERWYK, ACTING IN CONCERT, COMMITTED THE

CRIME COMMITTED THE CRIME OF MONEY LAUNDERING  
COMMITTED THE CRIME OF MONEY IN THE THIRD DEGREE, IN  
VIOLATION OF PENAL LAW SECTION 470.10(1)(B)(I)(A)(III), IN THAT  
ON OR ABOUT JUNE 29, 2015, IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWING THAT THE PROPERTY INVOLVED ONE OR  
MORE FINANCIAL TRANSACTIONS REPRESENTS THE PROCEEDS  
OF CRIMINAL CONDUCT, THEY CONDUCTED ONE OR MORE SUCH  
FINANCIAL TRANSACTIONS WHICH IN FACT INVOLVED THE  
PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO  
PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT AND THE  
TOTAL VALUE OF SUCH PROPERTY INVOLVED IN SUCH  
FINANCIAL TRANSACTION OR TRANSACTIONS EXCEEDED \$50,000.

PATTERN ACT 117

THE DEFENDANTS, CYRUS IRANI AND CLARK W. BRUNER,  
ACTING IN CONCERT WITH OTHERS, COMMITTED THE CRIME  
COMMITTED THE CRIME OF MONEY LAUNDERING IN THE  
FOURTH DEGREE, IN VIOLATION OF PENAL LAW SECTION  
470.05(2)(A)(I)(B), IN THAT ON OR ABOUT JUNE 30, 2015, IN THE  
COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT ONE OR  
MORE MONETARY INSTRUMENTS REPRESENTED THE PROCEEDS  
OF SPECIFIED CRIMINAL CONDUCT, THEY TRANSPORTED,  
TRANSMITTED OR TRANSFERRED ON ONE OR MORE OCCASIONS,

MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT AND THE VALUE OF SUCH MONETARY INSTRUMENTS EXCEEDED \$10,000.

PATTERN ACT 118

THE DEFENDANTS, CYRUS IRANI, CLARK W. BRUNER, RICHARD VANDERWYK, AND DAVID CHANG, ACTING IN CONCERT, COMMITTED THE CRIME COMMITTED THE CRIME OF MONEY LAUNDERING IN THE FOURTH DEGREE, IN VIOLATION OF PENAL LAW SECTION 470.05(2)(A)(I)(B), IN THAT ON OR ABOUT JULY 1, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, THEY TRANSPORTED, TRANSMITTED OR TRANSFERRED ON ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT AND THE VALUE OF SUCH MONETARY INSTRUMENTS EXCEEDED \$10,000.

PATTERN ACT 119

THE DEFENDANTS, CYRUS IRANI, SAUL SALAMA, AND SALLY

MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT JULY 2, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 120

THE DEFENDANTS, CYRUS IRANI, SAUL SALAMA, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT JULY 3, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 121

THE DEFENDANTS, CYRUS IRANI AND DAVID CHANG, ACTING IN

CONCERT WITH OTHERS, COMMITTED THE CRIME COMMITTED  
THE CRIME OF MONEY LAUNDERING IN THE FOURTH DEGREE, IN  
VIOLATION OF PENAL LAW SECTION 470.05(2)(A)(I)(B), IN THAT ON  
OR ABOUT JULY 16, 2015, IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY  
INSTRUMENTS REPRESENTED THE PROCEEDS OF SPECIFIED  
CRIMINAL CONDUCT, THEY TRANSPORTED, TRANSMITTED OR  
TRANSFERRED ON ONE OR MORE OCCASIONS, MONETARY  
INSTRUMENTS WHICH IN FACT REPRESENTED THE PROCEEDS OF  
SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE  
CARRYING ON OF CRIMINAL CONDUCT AND THE VALUE OF SUCH  
MONETARY INSTRUMENTS EXCEEDED \$10,000.

PATTERN ACT 122

THE DEFENDANTS, CYRUS IRANI, SAUL SALAMA, AND SALLY  
MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME  
OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION  
OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT JULY 31,  
2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY  
KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL  
GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE  
EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE  
MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

PATTERN ACT 123

THE DEFENDANTS, CYRUS IRANI, CLARK W. BRUNER, AND DAVID CHANG, ACTING IN CONCERT, COMMITTED THE CRIME COMMITTED THE CRIME OF MONEY LAUNDERING COMMITTED THE CRIME OF MONEY IN THE THIRD DEGREE, IN VIOLATION OF PENAL LAW SECTION 470.10(1)(B)(I)(A)(III), IN THAT ON OR ABOUT AUGUST 5, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT THE PROPERTY INVOLVED ONE OR MORE FINANCIAL TRANSACTIONS REPRESENTS THE PROCEEDS OF CRIMINAL CONDUCT, THEY CONDUCTED ONE OR MORE SUCH FINANCIAL TRANSACTIONS WHICH IN FACT INVOLVED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT AND THE TOTAL VALUE OF SUCH PROPERTY INVOLVED IN SUCH FINANCIAL TRANSACTION OR TRANSACTIONS EXCEEDED \$50,000.

PATTERN ACT 124

THE DEFENDANTS, CYRUS IRANI AND JEFFREY METELITZ, ACTING IN CONCERT, COMMITTED THE CRIME COMMITTED THE CRIME OF MONEY LAUNDERING IN THE FOURTH DEGREE, IN VIOLATION OF PENAL LAW SECTION 470.05(2)(A)(I)(B), IN THAT ON OR ABOUT AUGUST 11, 2015, IN THE COUNTY OF QUEENS AND



ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, THEY TRANSPORTED, TRANSMITTED OR TRANSFERRED ON ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT AND THE VALUE OF SUCH MONETARY INSTRUMENTS EXCEEDED \$10,000.

PATTERN ACT 125

THE DEFENDANTS, CYRUS IRANI, SAUL SALAMA, AND SALLY MEDINA-CABELLO ACTING IN CONCERT, COMMITTED THE CRIME OF PROMOTING GAMBLING IN THE FIRST DEGREE, IN VIOLATION OF PENAL LAW SECTION 225.10(1), IN THAT ON OR ABOUT SEPTEMBER 7, 2015, IN THE COUNTY OF QUEENS AND ELSEWHERE, THEY KNOWINGLY ADVANCED AND PROFITED FROM UNLAWFUL GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR ACCEPTED ON THAT DATE MORE THAN FIVE BETS TOTALING MORE THAN \$5,000.

SECOND COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT, ACCUSES THE DEFENDANTS CYRUS IRANI, SAUL SALAMA, JOHNSON MATHEW, RICHARD VANDERWYK, JEFFREY METELITZ, DAVID CHANG, THOMAS CORTESE, ANDRES ARRIAGA, MICHAEL GALLAGHER, CLARK W BRUNER, CLARK OLIVER BRUNER, CHRISTOPHER BRUNER AND MICHAEL GALOYAN OF MONEY LAUNDERING IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH OTHER PERSONS, ON OR ABOUT AND BETWEEN JANUARY 03, 2013 AND SEPTEMBER 08, 2015 IN THE COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT THE PROPERTY INVOLVED IN ONE OR MORE FINANCIAL TRANSACTIONS REPRESENTED THE PROCEEDS OF A CLASS A, B OR C FELONY UNDER THE LAWS OF THIS STATE, CONDUCTED ONE OR MORE SUCH FINANCIAL TRANSACTIONS, , AS FOLLOWS: THE EXCHANGE OF ILLEGAL SPORTS GAMBLING PROCEEDS, WHICH IN FACT INVOLVED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WHICH IN FACT INVOLVED THE PROCEEDS OF ANY SUCH FELONY, WITH INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT, AND THE TOTAL VALUE OF THE PROPERTY INVOLVED IN SUCH FINANCIAL TRANSACTION OR TRANSACTIONS EXCEEDED ONE MILLION DOLLARS.

THIRD COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI AND JOHNSON MATHEW OF MONEY  
LAUNDERING IN THE SECOND DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER AND ACTING IN CONCERT  
WITH OTHER PERSONS, ON OR ABOUT AND BETWEEN JANUARY 03, 2013 AND JANUARY  
27, 2014 IN THE COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT THE  
PROPERTY INVOLVED IN ONE OR MORE FINANCIAL TRANSACTIONS REPRESENTED  
THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, CONDUCTED ONE OR MORE SUCH  
FINANCIAL TRANSACTIONS, AS FOLLOWS: THE EXCHANGE OF ILLEGAL SPORTS  
GAMBLING PROCEEDS, WHICH IN FACT INVOLVED THE PROCEEDS OF SPECIFIED  
CRIMINAL CONDUCT, WHICH IN FACT INVOLVED THE PROCEEDS OF SPECIFIED  
CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE CARRYING ON OF SPECIFIED  
CRIMINAL CONDUCT; AND THE TOTAL VALUE OF THE PROPERTY INVOLVED IN SUCH  
FINANCIAL TRANSACTION OR TRANSACTIONS EXCEEDED ONE HUNDRED THOUSAND  
DOLLARS.

FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS OF CONSPIRACY IN THE FIFTH DEGREE COMMITTED AS  
FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT AND BETWEEN JANUARY 03, 2013 AND SEPTEMBER  
08, 2015 IN THE COUNTY OF QUEENS WITH INTENT THAT CONDUCT CONSTITUTING A  
FELONY BE PERFORMED, AGREED WITH ONE OR MORE PERSONS TO ENGAGE IN OR  
CAUSE THE PERFORMANCE OF SUCH CONDUCT. AND IN THE FURTHERANCE OF  
SAID CONSPIRACY AND IN ORDER TO EFFECT THE OBJECTS THEREOF, THE  
FOLLOWING OVERT ACTS, AMONG OTHERS, WERE DONE AND PERFORMED BY CERTAIN  
OF THE PARTIES TO SAID CONSPIRACY, NAMELY: ON FEBRUARY 17, 2015, MICHAEL  
GALOYAN DELIVERED GAMBLING  
PROCEEDS FROM INTERNET GAMBLING IN QUEENS COUNTY.

FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, JOHNSON MATHEW, SALLY MEDINA-CABELLO  
AND JIMMY JOSEPH OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED  
AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT FEBRUARY 24, 2014 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI AND MICHAEL GALOYAN OF MONEY  
LAUNDERING IN THE THIRD DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER AND ACTING IN CONCERT  
WITH OTHER PERSONS, ON OR ABOUT AND BETWEEN MARCH 05, 2014 AND JUNE  
20, 2015 IN THE COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT THE  
PROPERTY INVOLVED IN ONE OR MORE FINANCIAL TRANSACTIONS REPRESENTED  
THE PROCEEDS OF CRIMINAL CONDUCT, CONDUCTED ONE OR MORE SUCH FINANCIAL  
TRANSACTIONS, AS FOLLOWS: THE EXCHANGE OF ILLEGAL SPORTS GAMBLING  
PROCEEDS, WHICH IN FACT INVOLVED THE PROCEEDS OF SPECIFIED CRIMINAL  
CONDUCT, WHICH IN FACT INVOLVED THE PROCEEDS OF SPECIFIED CRIMINAL  
CONDUCT, WITH INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT, AND  
THE TOTAL VALUE OF THE PROPERTY INVOLVED IN SUCH FINANCIAL TRANSACTION  
OR TRANSACTIONS EXCEEDED FIFTY THOUSAND DOLLARS.

SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT, ACCUSES THE DEFENDANTS CYRUS IRANI AND MICHAEL GALOYAN OF CONSPIRACY IN THE FIFTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER AND ACTING IN CONCERT WITH OTHER PERSONS, ON OR ABOUT AND BETWEEN MARCH 05, 2014 AND JUNE 30, 2014 IN THE COUNTY OF QUEENS WITH INTENT THAT CONDUCT CONSTITUTING A FELONY BE PERFORMED, AGREED WITH ONE OR MORE PERSONS TO ENGAGE IN OR CAUSE THE PERFORMANCE OF SUCH CONDUCT. AND IN THE FURTHERANCE OF SAID CONSPIRACY AND IN ORDER TO EFFECT THE OBJECTS THEREOF, THE FOLLOWING OVERT ACTS, AMONG OTHERS, WERE DONE AND PERFORMED BY CERTAIN OF THE PARTIES TO SAID CONSPIRACY, NAMELY: ON APRIL 8, 2014, MICHAEL GALOYAN SPOKE TO CYRUS IRANI FROM QUEENS COUNTY, NEW YORK USING TELEPHONE NUMBER (718) 721-7513 TO DISCUSS CUSTOMER K604 AND THEN DEPOSITED \$5,000 CASH INTO CYRUS' BANK OF AMERICA ACCOUNT FROM THE FOREST HILLS, QUEENS BRANCH.

EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI AND ANDRES ARRIAGA OF MONEY  
LAUNDERING IN THE FOURTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER AND ACTING IN CONCERT  
WITH OTHER PERSONS, ON OR ABOUT MARCH 07, 2014 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED  
THE PROCEEDS OF CRIMINAL CONDUCT, TRANSPORTED, TRANSMITTED OR  
TRANSFERRED ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT  
REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH THE  
INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT, AND THE TOTAL  
VALUE OF SUCH MONETARY INSTRUMENT OR INSTRUMENTS EXCEEDED TEN THOUSAND  
DOLLARS.



NINTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI AND JEFFREY METELITZ OF MONEY  
LAUNDERING IN THE FOURTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER AND ACTING IN CONCERT  
WITH OTHER PERSONS, ON OR ABOUT MARCH 27, 2014 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED  
THE PROCEEDS OF CRIMINAL CONDUCT, TRANSPORTED, TRANSMITTED OR  
TRANSFERRED ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT  
REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH THE  
INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT, AND THE TOTAL  
VALUE OF SUCH MONETARY INSTRUMENT OR INSTRUMENTS EXCEEDED TEN THOUSAND  
DOLLARS.

TENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI AND DAVID CHANG OF MONEY LAUNDERING  
IN THE FOURTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER AND ACTING IN CONCERT  
WITH OTHER PERSONS, ON OR ABOUT MARCH 28, 2014 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED  
THE PROCEEDS OF CRIMINAL CONDUCT, TRANSPORTED, TRANSMITTED OR  
TRANSFERRED ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT  
REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH THE  
INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT, AND THE TOTAL  
VALUE OF SUCH MONETARY INSTRUMENT OR INSTRUMENTS EXCEEDED TEN THOUSAND  
DOLLARS.

ELEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, JOHNSON MATHEW, SALLY MEDINA-CABELLO  
AND JIMMY JOSEPH OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED  
AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT APRIL 07, 2014 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

TWELFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, JOHNSON MATHEW, SALLY MEDINA-CABELLO  
AND JIMMY JOSEPH OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED  
AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT APRIL 09, 2014 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

THIRTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI AND SAUL SALAMA OF MONEY LAUNDERING  
IN THE FOURTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER AND ACTING IN CONCERT  
WITH OTHER PERSONS, ON OR ABOUT APRIL 10, 2014 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED  
THE PROCEEDS OF CRIMINAL CONDUCT, TRANSPORTED, TRANSMITTED OR  
TRANSFERRED ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT  
REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH THE  
INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT, AND THE TOTAL  
VALUE OF SUCH MONETARY INSTRUMENT OR INSTRUMENTS EXCEEDED TEN THOUSAND  
DOLLARS.

FOURTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, JOHNSON MATHEW, SALLY MEDINA-CABELLO  
AND JIMMY JOSEPH OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED  
AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT APRIL 11, 2014 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

FIFTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, JOHNSON MATHEW, SALLY MEDINA-CABELLO  
AND JIMMY JOSEPH OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED  
AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT APRIL 12, 2014 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

SIXTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, JOHNSON MATHEW, SALLY MEDINA-CABELLO  
AND JIMMY JOSEPH OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED  
AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT APRIL 14, 2014 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.



SEVENTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, JOHNSON MATHEW, SALLY MEDINA-CABELLO  
AND JIMMY JOSEPH OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED  
AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT APRIL 15, 2014 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

EIGHTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, JOHNSON MATHEW, SALLY MEDINA-CABELLO  
AND JIMMY JOSEPH OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED  
AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT APRIL 20, 2014 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

NINETEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO AND JEFFREY  
METELITZ OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT APRIL 23, 2014 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

TWENTIETH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO AND JEFFREY  
METELITZ OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT APRIL 26, 2014 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

TWENTY FIRST COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO AND JEFFREY  
METELITZ OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT APRIL 27, 2014 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

TWENTY SECOND COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, JOHNSON MATHEW, SALLY MEDINA-  
CABELLO, JEFFREY METELITZ AND JIMMY JOSEPH OF PROMOTING GAMBLING IN  
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT APRIL 28, 2014 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

TWENTY THIRD COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, JOHNSON MATHEW, SALLY MEDINA-CABELLO  
AND JIMMY JOSEPH OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED  
AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT APRIL 29, 2014 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

TWENTY FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, JOHNSON MATHEW, SALLY MEDINA-CABELLO  
AND JIMMY JOSEPH OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED  
AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT MAY 01, 2014 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.



TWENTY FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI AND THOMAS CORTESE OF MONEY  
LAUNDERING IN THE THIRD DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER AND ACTING IN CONCERT  
WITH OTHER PERSONS, ON OR ABOUT AND BETWEEN MAY 02, 2014 AND JUNE 30,  
2015 IN THE COUNTY OF QUEENS, KNOWING THAT THE PROPERTY INVOLVED IN  
ONE OR MORE FINANCIAL TRANSACTIONS REPRESENTED THE PROCEEDS OF  
CRIMINAL CONDUCT, CONDUCTED ONE OR MORE SUCH FINANCIAL TRANSACTIONS,  
AS FOLLOWS: THE EXCHANGE OF ILLEGAL SPORTS GAMBLING PROCEEDS, WHICH IN  
FACT INVOLVED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WHICH IN  
FACT INVOLVED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO  
PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT, AND THE TOTAL VALUE OF  
THE PROPERTY INVOLVED IN SUCH FINANCIAL TRANSACTION OR TRANSACTIONS  
EXCEEDED FIFTY THOUSAND DOLLARS.

TWENTY SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANT CYRUS IRANI OF MONEY LAUNDERING IN THE FOURTH  
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT MAY 13, 2014 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWING THAT THE PROPERTY INVOLVED IN ONE OR MORE  
FINANCIAL TRANSACTIONS REPRESENTED THE PROCEEDS OF CRIMINAL CONDUCT,  
CONDUCTED ONE OR MORE SUCH FINANCIAL TRANSACTIONS, AS FOLLOWS: THE  
EXCHANGE OF ILLEGAL SPORTS GAMBLING PROCEEDS, WHICH IN FACT INVOLVED THE  
PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WHICH IN FACT INVOLVED THE  
PROCEEDS OF CRIMINAL CONDUCT, KNOWING THAT THE TRANSACTION OR  
TRANSACTIONS IN WHOLE OR IN PART WERE DESIGNED TO CONCEAL OR DISGUISE  
THE NATURE, THE LOCATION, THE SOURCE, THE OWNERSHIP OR THE CONTROL OF  
THE PROCEEDS OF CRIMINAL CONDUCT, AND THE TOTAL VALUE OF THE PROPERTY  
INVOLVED IN SUCH FINANCIAL TRANSACTION OR TRANSACTIONS EXCEEDED FIVE  
THOUSAND DOLLARS.

TWENTY SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANT CYRUS IRANI OF MONEY LAUNDERING IN THE FOURTH  
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT MAY 27, 2014 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWING THAT THE PROPERTY INVOLVED IN ONE OR MORE  
FINANCIAL TRANSACTIONS REPRESENTED THE PROCEEDS OF CRIMINAL CONDUCT,  
CONDUCTED ONE OR MORE SUCH FINANCIAL TRANSACTIONS, AS FOLLOWS: THE  
EXCHANGE OF ILLEGAL SPORTS GAMBLING PROCEEDS, WHICH IN FACT INVOLVED THE  
PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WHICH IN FACT INVOLVED THE  
PROCEEDS OF CRIMINAL CONDUCT, KNOWING THAT THE TRANSACTION OR  
TRANSACTIONS IN WHOLE OR IN PART WERE DESIGNED TO CONCEAL OR DISGUISE  
THE NATURE, THE LOCATION, THE SOURCE, THE OWNERSHIP OR THE CONTROL OF  
THE PROCEEDS OF CRIMINAL CONDUCT, AND THE TOTAL VALUE OF THE PROPERTY  
INVOLVED IN SUCH FINANCIAL TRANSACTION OR TRANSACTIONS EXCEEDED FIVE  
THOUSAND DOLLARS.

TWENTY EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO, CLARK W  
BRUNER, CLARK OLIVER BRUNER AND CHRISTOPHER BRUNER OF PROMOTING GAMBLING  
IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT SEPTEMBER 21, 2014 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

TWENTY NINTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO, CLARK W  
BRUNER, CLARK OLIVER BRUNER AND CHRISTOPHER BRUNER OF PROMOTING GAMBLING  
IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT SEPTEMBER 27, 2014 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

THIRTIETH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO, CLARK W  
BRUNER, CLARK OLIVER BRUNER AND CHRISTOPHER BRUNER OF PROMOTING GAMBLING  
IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT SEPTEMBER 28, 2014 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

THIRTY FIRST COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO, CLARK W  
BRUNER, CLARK OLIVER BRUNER AND CHRISTOPHER BRUNER OF PROMOTING GAMBLING  
IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT OCTOBER 04, 2014 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

THIRTY SECOND COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO, CLARK W  
BRUNER, CLARK OLIVER BRUNER AND CHRISTOPHER BRUNER OF PROMOTING GAMBLING  
IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT OCTOBER 05, 2014 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.



THIRTY THIRD COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, CLARK W BRUNER AND CLARK OLIVER  
BRUNER OF MONEY LAUNDERING IN THE FOURTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT OCTOBER 10, 2014 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED  
THE PROCEEDS OF CRIMINAL CONDUCT, TRANSPORTED, TRANSMITTED OR  
TRANSFERRED ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT  
REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH THE  
INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT, AND THE TOTAL  
VALUE OF SUCH MONETARY INSTRUMENT OR INSTRUMENTS EXCEEDED TEN THOUSAND  
DOLLARS.

THIRTY FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO, CLARK W  
BRUNER, CLARK OLIVER BRUNER AND CHRISTOPHER BRUNER OF PROMOTING GAMBLING  
IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT OCTOBER 11, 2014 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

THIRTY FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO, CLARK W  
BRUNER, CLARK OLIVER BRUNER AND CHRISTOPHER BRUNER OF PROMOTING GAMBLING  
IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT OCTOBER 12, 2014 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

THIRTY SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SAUL SALAMA, JOHNSON MATHEW, SALLY  
MEDINA-CABELLO, JEFFREY METELITZ, JIMMY JOSEPH, JULIO ALVARENGA AND  
ANDRES ARRIAGA OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS  
FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT OCTOBER 13, 2014 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

THIRTY SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SAUL SALAMA, JOHNSON MATHEW, SALLY  
MEDINA-CABELLO, JEFFREY METELITZ, JIMMY JOSEPH, JULIO ALVARENGA AND  
ANDRES ARRIAGA OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS  
FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT OCTOBER 14, 2014 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

THIRTY EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI AND SAUL SALAMA OF MONEY LAUNDERING  
IN THE FOURTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER AND ACTING IN CONCERT  
WITH OTHER PERSONS, ON OR ABOUT OCTOBER 14, 2014 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED  
THE PROCEEDS OF CRIMINAL CONDUCT, TRANSPORTED, TRANSMITTED OR  
TRANSFERRED ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT  
REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH THE  
INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT, AND THE TOTAL  
VALUE OF SUCH MONETARY INSTRUMENT OR INSTRUMENTS EXCEEDED TEN THOUSAND  
DOLLARS.

THIRTY NINTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SAUL SALAMA, JOHNSON MATHEW, SALLY  
MEDINA-CABELLO, JEFFREY METELITZ, JIMMY JOSEPH, JULIO ALVARENGA AND  
ANDRES ARRIAGA OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS  
FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT OCTOBER 15, 2014 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

FORTIETH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SAUL SALAMA, JOHNSON MATHEW, SALLY  
MEDINA-CABELLO, JEFFREY METELITZ, JIMMY JOSEPH, JULIO ALVARENGA AND  
ANDRES ARRIAGA OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS  
FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT OCTOBER 16, 2014 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.



FORTY FIRST COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SAUL SALAMA, JOHNSON MATHEW, SALLY  
MEDINA-CABELLO, JEFFREY METELITZ AND JIMMY JOSEPH OF PROMOTING  
GAMBLING IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT OCTOBER 17, 2014 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

FORTY SECOND COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI AND SAUL SALAMA OF MONEY LAUNDERING  
IN THE FOURTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER AND ACTING IN CONCERT  
WITH OTHER PERSONS, ON OR ABOUT OCTOBER 17, 2014 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED  
THE PROCEEDS OF CRIMINAL CONDUCT, TRANSPORTED, TRANSMITTED OR  
TRANSFERRED ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT  
REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH THE  
INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT, AND THE TOTAL  
VALUE OF SUCH MONETARY INSTRUMENT OR INSTRUMENTS EXCEEDED TEN THOUSAND  
DOLLARS.

FORTY THIRD COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SAUL SALAMA, JOHNSON MATHEW, SALLY  
MEDINA-CABELLO, JEFFREY METELITZ, JIMMY JOSEPH, JULIO ALVARENGA AND  
ANDRES ARRIAGA OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS  
FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT OCTOBER 18, 2014 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

FORTY FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SAUL SALAMA, JOHNSON MATHEW, SALLY  
MEDINA-CABELLO, JEFFREY METELITZ, JIMMY JOSEPH, JULIO ALVARENGA AND  
ANDRES ARRIAGA OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS  
FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT OCTOBER 19, 2014 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

FORTY FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI AND SAUL SALAMA OF MONEY LAUNDERING  
IN THE FOURTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER AND ACTING IN CONCERT  
WITH OTHER PERSONS, ON OR ABOUT NOVEMBER 21, 2014 IN THE COUNTY OF  
QUEENS AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS  
REPRESENTED THE PROCEEDS OF CRIMINAL CONDUCT, TRANSPORTED,  
TRANSMITTED OR TRANSFERRED ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS  
WHICH IN FACT REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT,  
WITH THE INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT, AND  
THE TOTAL VALUE OF SUCH MONETARY INSTRUMENT OR INSTRUMENTS EXCEEDED  
TEN THOUSAND DOLLARS.

FORTY SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI AND ANDRES ARRIAGA OF MONEY  
LAUNDERING IN THE FOURTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER AND ACTING IN CONCERT  
WITH OTHER PERSONS, ON OR ABOUT NOVEMBER 21, 2014 IN THE COUNTY OF  
QUEENS AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS  
REPRESENTED THE PROCEEDS OF CRIMINAL CONDUCT, TRANSPORTED,  
TRANSMITTED OR TRANSFERRED ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS  
WHICH IN FACT REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT,  
WITH THE INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT, AND  
THE TOTAL VALUE OF SUCH MONETARY INSTRUMENT OR INSTRUMENTS EXCEEDED  
TEN THOUSAND DOLLARS.

FORTY SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI AND RICHARD VANDERWYK OF MONEY  
LAUNDERING IN THE FOURTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER AND ACTING IN CONCERT  
WITH OTHER PERSONS, ON OR ABOUT AND BETWEEN NOVEMBER 30, 2014 AND  
DECEMBER 01, 2014 IN THE COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT  
ONE OR MORE MONETARY INSTRUMENTS REPRESENTED THE PROCEEDS OF CRIMINAL  
CONDUCT, TRANSPORTED, TRANSMITTED OR TRANSFERRED ONE OR MORE OCCASIONS,  
MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED THE PROCEEDS OF SPECIFIED  
CRIMINAL CONDUCT, WITH THE INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL  
CONDUCT, AND THE TOTAL VALUE OF SUCH MONETARY INSTRUMENT OR  
INSTRUMENTS EXCEEDED TEN THOUSAND DOLLARS.

FORTY EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI AND SAUL SALAMA OF MONEY LAUNDERING  
IN THE FOURTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER AND ACTING IN CONCERT  
WITH OTHER PERSONS, ON OR ABOUT DECEMBER 10, 2014 IN THE COUNTY OF  
QUEENS AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS  
REPRESENTED THE PROCEEDS OF CRIMINAL CONDUCT, TRANSPORTED,  
TRANSMITTED OR TRANSFERRED ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS  
WHICH IN FACT REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT,  
WITH THE INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT, AND  
THE TOTAL VALUE OF SUCH MONETARY INSTRUMENT OR INSTRUMENTS EXCEEDED  
TEN THOUSAND DOLLARS.



FORTY NINTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI AND SAUL SALAMA OF CONSPIRACY IN  
THE FOURTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER AND ACTING IN CONCERT  
WITH OTHER PERSONS, ON OR ABOUT AND BETWEEN DECEMBER 19, 2014 AND  
DECEMBER 20, 2014 IN THE COUNTY OF QUEENS, WITH INTENT THAT CONDUCT  
CONSTITUTING A CLASS B OR CLASS C FELONY BE PERFORMED, AGREED WITH ONE  
OR MORE PERSONS TO ENGAGE IN OR CAUSE THE PERFORMANCE OF SUCH CONDUCT.  
AND IN THE FURTHERANCE OF SAID CONSPIRACY AND IN ORDER TO EFFECT THE  
OBJECTS THEREOF, THE FOLLOWING OVERT ACTS, AMONG OTHERS, WERE DONE AND  
PERFORMED BY CERTAIN OF THE PARTIES TO SAID UNLAWFUL CONSPIRACY, NAMELY:

ON  
DECEMBER 19, 2014, CYRUS IRANI AND SAUL SALAMA HAD A  
CONVERSATION WHEREIN SAUL AGREED TO DELIVER \$140,000 IN  
CASH TO A MANHATTAN COMIC BOOK COLLECTIBLES STORE.  
ON DECEMBER 20, 2014, SAUL SALAMA DELIVERED THE MONEY.

FIFTIETH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI AND SAUL SALAMA OF MONEY LAUNDERING  
IN THE SECOND DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER AND ACTING IN CONCERT  
WITH OTHER PERSONS, ON OR ABOUT DECEMBER 20, 2014 IN THE COUNTY OF  
QUEENS AND ELSEWHERE, KNOWING THAT THE PROPERTY INVOLVED IN ONE OR  
MORE FINANCIAL TRANSACTIONS REPRESENTED THE PROCEEDS OF SPECIFIED  
CRIMINAL CONDUCT, CONDUCTED ONE OR MORE SUCH FINANCIAL TRANSACTIONS,  
AS FOLLOWS: THE EXCHANGE OF ILLEGAL SPORTS GAMBLING PROCEEDS, WHICH IN  
FACT INVOLVED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WHICH IN  
FACT INVOLVED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO  
PROMOTE THE CARRYING ON OF SPECIFIED CRIMINAL CONDUCT; AND THE TOTAL  
VALUE OF THE PROPERTY INVOLVED IN SUCH FINANCIAL TRANSACTION OR  
TRANSACTIONS EXCEEDED ONE HUNDRED THOUSAND DOLLARS.

FIFTY FIRST COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, CLARK W BRUNER AND CLARK OLIVER  
BRUNER OF MONEY LAUNDERING IN THE FOURTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT AND BETWEEN DECEMBER 29, 2014 AND DECEMBER  
31, 2014 IN THE COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT ONE OR MORE  
MONETARY INSTRUMENTS REPRESENTED THE PROCEEDS OF CRIMINAL CONDUCT,  
TRANSPORTED, TRANSMITTED OR TRANSFERRED ONE OR MORE OCCASIONS,  
MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED THE PROCEEDS OF SPECIFIED  
CRIMINAL CONDUCT, WITH THE INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL  
CONDUCT, AND THE TOTAL VALUE OF SUCH MONETARY INSTRUMENT OR  
INSTRUMENTS EXCEEDED TEN THOUSAND DOLLARS.

FIFTY SECOND COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SAUL SALAMA, SALLY MEDINA-CABELLO  
AND THOMAS CORTESE OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED  
AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT JANUARY 01, 2015 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

FIFTY THIRD COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO AND THOMAS  
CORTESE OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT JANUARY 02, 2015 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

FIFTY FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, CLARK W BRUNER AND CLARK OLIVER  
BRUNER OF MONEY LAUNDERING IN THE FOURTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT JANUARY 02, 2015 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED  
THE PROCEEDS OF CRIMINAL CONDUCT, TRANSPORTED, TRANSMITTED OR  
TRANSFERRED ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT  
REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH THE  
INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT, AND THE TOTAL  
VALUE OF SUCH MONETARY INSTRUMENT OR INSTRUMENTS EXCEEDED TEN THOUSAND  
DOLLARS.

FIFTY FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO AND THOMAS  
CORTESE OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT JANUARY 03, 2015 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

FIFTY SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO AND THOMAS  
CORTESE OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT JANUARY 04, 2015 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.



FIFTY SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI AND JOHNSON MATHEW OF MONEY  
LAUNDERING IN THE FOURTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER AND ACTING IN CONCERT  
WITH OTHER PERSONS, ON OR ABOUT AND BETWEEN JANUARY 04, 2015 AND JUNE  
10, 2015 IN THE COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT ONE OR MORE  
MONETARY INSTRUMENTS REPRESENTED THE PROCEEDS OF CRIMINAL CONDUCT,  
TRANSPORTED, TRANSMITTED OR TRANSFERRED ONE OR MORE OCCASIONS,  
MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED THE PROCEEDS OF SPECIFIED  
CRIMINAL CONDUCT, WITH THE INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL  
CONDUCT, AND THE TOTAL VALUE OF SUCH MONETARY INSTRUMENT OR  
INSTRUMENTS EXCEEDED TEN THOUSAND DOLLARS.

FIFTY EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, CLARK W BRUNER AND CLARK OLIVER  
BRUNER OF MONEY LAUNDERING IN THE FOURTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT JANUARY 06, 2015 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED  
THE PROCEEDS OF CRIMINAL CONDUCT, TRANSPORTED, TRANSMITTED OR  
TRANSFERRED ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT  
REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH THE  
INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT, AND THE TOTAL  
VALUE OF SUCH MONETARY INSTRUMENT OR INSTRUMENTS EXCEEDED TEN THOUSAND  
DOLLARS.

FIFTY NINTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, CLARK W BRUNER AND CLARK OLIVER  
BRUNER OF MONEY LAUNDERING IN THE FOURTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT JANUARY 09, 2015 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED  
THE PROCEEDS OF CRIMINAL CONDUCT, TRANSPORTED, TRANSMITTED OR  
TRANSFERRED ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT  
REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH THE  
INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT, AND THE TOTAL  
VALUE OF SUCH MONETARY INSTRUMENT OR INSTRUMENTS EXCEEDED TEN THOUSAND  
DOLLARS.

SIXTIETH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO AND THOMAS  
CORTESE OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT JANUARY 11, 2015 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

SIXTY FIRST COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO AND CASSONDRA  
SMITH-LUTTMAN OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS  
FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT JANUARY 12, 2015 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

SIXTY SECOND COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO AND CASSONDRA  
SMITH-LUTTMAN OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS  
FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT JANUARY 13, 2015 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

SIXTY THIRD COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, CLARK W BRUNER AND CLARK OLIVER  
BRUNER OF MONEY LAUNDERING IN THE FOURTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT AND BETWEEN JANUARY 16, 2015 AND JANUARY  
26, 2015 IN THE COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT ONE OR MORE  
MONETARY INSTRUMENTS REPRESENTED THE PROCEEDS OF CRIMINAL CONDUCT,  
TRANSPORTED, TRANSMITTED OR TRANSFERRED ONE OR MORE OCCASIONS,  
MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED THE PROCEEDS OF SPECIFIED  
CRIMINAL CONDUCT, WITH THE INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL  
CONDUCT, AND THE TOTAL VALUE OF SUCH MONETARY INSTRUMENT OR  
INSTRUMENTS EXCEEDED TEN THOUSAND DOLLARS.

SIXTY FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO AND CASSONDRA  
SMITH-LUTTMAN OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS  
FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT JANUARY 17, 2015 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.



SIXTY FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO, JULIO  
ALVARENGA AND ANDRES ARRIAGA OF PROMOTING GAMBLING IN THE FIRST DEGREE  
COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT JANUARY 19, 2015 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

SIXTY SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO, JULIO  
ALVARENGA AND ANDRES ARRIAGA OF PROMOTING GAMBLING IN THE FIRST DEGREE  
COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT JANUARY 20, 2015 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

SIXTY SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO, JULIO  
ALVARENGA, ANDRES ARRIAGA AND CASSONDRA SMITH-LUTTMAN OF PROMOTING  
GAMBLING IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT JANUARY 24, 2015 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

SIXTY EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO, JULIO  
ALVARENGA AND ANDRES ARRIAGA OF PROMOTING GAMBLING IN THE FIRST DEGREE  
COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT JANUARY 25, 2015 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

SIXTY NINTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, JOHNSON MATHEW, SALLY MEDINA-CABELLO  
AND JIMMY JOSEPH OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED  
AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT JANUARY 26, 2015 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

SEVENTIETH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO AND JEFFREY  
METELITZ OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT JANUARY 27, 2015 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

SEVENTY FIRST COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, JOHNSON MATHEW, SALLY MEDINA-  
CABELLO, JEFFREY METELITZ AND JIMMY JOSEPH OF PROMOTING GAMBLING IN  
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT JANUARY 28, 2015 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

SEVENTY SECOND COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO AND JEFFREY  
METELITZ OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT JANUARY 29, 2015 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.



SEVENTY THIRD COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANT CYRUS IRANI OF MONEY LAUNDERING IN THE FOURTH  
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT JANUARY 29, 2015 IN THE COUNTY OF  
QUEENS AND ELSEWHERE, KNOWING THAT THE PROPERTY INVOLVED IN ONE OR  
MORE FINANCIAL TRANSACTIONS REPRESENTED THE PROCEEDS OF CRIMINAL  
CONDUCT, CONDUCTED ONE OR MORE SUCH FINANCIAL TRANSACTIONS, AS  
FOLLOWS: THE EXCHANGE OF ILLEGAL SPORTS GAMBLING PROCEEDS, WHICH IN FACT  
INVOLVED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WHICH IN FACT  
INVOLVED THE PROCEEDS OF CRIMINAL CONDUCT, KNOWING THAT THE  
TRANSACTION OR TRANSACTIONS IN WHOLE OR IN PART WERE DESIGNED TO CONCEAL  
OR DISGUISE THE NATURE, THE LOCATION, THE SOURCE, THE OWNERSHIP OR THE  
CONTROL OF THE PROCEEDS OF CRIMINAL CONDUCT, AND THE TOTAL VALUE OF  
THE PROPERTY INVOLVED IN SUCH FINANCIAL TRANSACTION OR TRANSACTIONS  
EXCEEDED FIVE THOUSAND DOLLARS.

SEVENTY FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI AND DAVID CHANG OF MONEY LAUNDERING  
IN THE SECOND DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER AND ACTING IN CONCERT  
WITH OTHER PERSONS, ON OR ABOUT AND BETWEEN JANUARY 30, 2015 AND  
FEBRUARY 02, 2015 IN THE COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT  
THE PROPERTY INVOLVED IN ONE OR MORE FINANCIAL TRANSACTIONS  
REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, CONDUCTED ONE OR  
MORE SUCH FINANCIAL TRANSACTIONS, AS FOLLOWS: THE EXCHANGE OF ILLEGAL  
SPORTS GAMBLING PROCEEDS, WHICH IN FACT INVOLVED THE PROCEEDS OF  
SPECIFIED CRIMINAL CONDUCT, WHICH IN FACT INVOLVED THE PROCEEDS OF  
SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE CARRYING ON OF  
SPECIFIED CRIMINAL CONDUCT; AND THE TOTAL VALUE OF THE PROPERTY INVOLVED  
IN SUCH FINANCIAL TRANSACTION OR TRANSACTIONS EXCEEDED ONE HUNDRED  
THOUSAND DOLLARS.

SEVENTY FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO, MICHAEL  
GALLAGHER AND MICHAEL GALOYAN OF PROMOTING GAMBLING IN THE FIRST  
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT JANUARY 30, 2015 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

SEVENTY SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SAUL SALAMA, SALLY MEDINA-CABELLO,  
JEFFREY METELITZ, THOMAS CORTESE, MICHAEL GALLAGHER, CASSONDRA SMITH-  
LUTTMAN AND MICHAEL GALOYAN OF PROMOTING GAMBLING IN THE FIRST DEGREE  
COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT JANUARY 31, 2015 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

SEVENTY SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SAUL SALAMA, JOHNSON MATHEW, SALLY  
MEDINA-CABELLO, JEFFREY METELITZ, JIMMY JOSEPH, JULIO ALVARENGA,  
THOMAS CORTESE, ANDRES ARRIAGA, MICHAEL GALLAGHER, CASSONDRA SMITH-  
LUTTMAN, CLARK W BRUNER, CLARK OLIVER BRUNER, CHRISTOPHER BRUNER AND  
MICHAEL GALOYAN OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS  
FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT FEBRUARY 01, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

SEVENTY EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, JOHNSON MATHEW, SALLY MEDINA-  
CABELLO, JEFFREY METELITZ, JIMMY JOSEPH, MICHAEL GALLAGHER, CLARK W  
BRUNER, CLARK OLIVER BRUNER, CHRISTOPHER BRUNER AND MICHAEL GALOYAN OF  
PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT FEBRUARY 02, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

SEVENTY NINTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, RICHARD VANDERWYK AND CLARK W BRUNER  
OF MONEY LAUNDERING IN THE FOURTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT AND BETWEEN FEBRUARY 02, 2015 AND FEBRUARY  
12, 2015 IN THE COUNTY OF QUEENS AND ELSEWHERE, KNOWING THAT ONE OR MORE  
MONETARY INSTRUMENTS REPRESENTED THE PROCEEDS OF CRIMINAL CONDUCT,  
TRANSPORTED, TRANSMITTED OR TRANSFERRED ONE OR MORE OCCASIONS,  
MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED THE PROCEEDS OF SPECIFIED  
CRIMINAL CONDUCT, WITH THE INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL  
CONDUCT, AND THE TOTAL VALUE OF SUCH MONETARY INSTRUMENT OR  
INSTRUMENTS EXCEEDED TEN THOUSAND DOLLARS.

EIGHTIETH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, JOHNSON MATHEW, SALLY MEDINA-  
CABELLO, JIMMY JOSEPH, MICHAEL GALLAGHER, CLARK W BRUNER, CLARK OLIVER  
BRUNER AND CHRISTOPHER BRUNER OF PROMOTING GAMBLING IN THE FIRST  
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT FEBRUARY 03, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.



EIGHTY FIRST COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, JOHNSON MATHEW, SALLY MEDINA-  
CABELLO, JIMMY JOSEPH, MICHAEL GALLAGHER, CLARK W BRUNER, CLARK OLIVER  
BRUNER, CHRISTOPHER BRUNER AND MICHAEL GALOYAN OF PROMOTING GAMBLING  
IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT FEBRUARY 04, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

EIGHTY SECOND COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, JOHNSON MATHEW, SALLY MEDINA-  
CABELLO, JIMMY JOSEPH, MICHAEL GALLAGHER, CLARK W BRUNER, CLARK OLIVER  
BRUNER, CHRISTOPHER BRUNER AND MICHAEL GALOYAN OF PROMOTING GAMBLING  
IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT FEBRUARY 05, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

EIGHTY THIRD COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, JOHNSON MATHEW, SALLY MEDINA-  
CABELLO, JIMMY JOSEPH, MICHAEL GALLAGHER, CLARK W BRUNER, CLARK OLIVER  
BRUNER, CHRISTOPHER BRUNER AND MICHAEL GALOYAN OF PROMOTING GAMBLING  
IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT FEBRUARY 06, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

EIGHTY FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SAUL SALAMA, JOHNSON MATHEW, SALLY  
MEDINA-CABELLO, JIMMY JOSEPH, JULIO ALVARENGA, THOMAS CORTESE, ANDRES  
ARRIAGA, MICHAEL GALLAGHER, CLARK W BRUNER, CLARK OLIVER BRUNER,  
CHRISTOPHER BRUNER AND MICHAEL GALOYAN OF PROMOTING GAMBLING IN THE  
FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT FEBRUARY 07, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

EIGHTY FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, JOHNSON MATHEW, SALLY MEDINA-  
CABELLO, JIMMY JOSEPH, MICHAEL GALLAGHER AND CASSONDRA SMITH-LUTTMAN  
OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT FEBRUARY 08, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

EIGHTY SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO AND CASSONDRA  
SMITH-LUTTMAN OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS  
FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT FEBRUARY 09, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

EIGHTY SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, CLARK W BRUNER AND CLARK OLIVER  
BRUNER OF MONEY LAUNDERING IN THE FOURTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT FEBRUARY 12, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED THE  
PROCEEDS OF CRIMINAL CONDUCT, TRANSPORTED, TRANSMITTED OR TRANSFERRED  
ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED  
THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH THE INTENT TO PROMOTE  
THE CARRYING ON OF CRIMINAL CONDUCT, AND THE TOTAL VALUE OF SUCH  
MONETARY INSTRUMENT OR INSTRUMENTS EXCEEDED TEN THOUSAND DOLLARS.

EIGHTY EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO AND CASSONDRA  
SMITH-LUTTMAN OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS  
FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT FEBRUARY 14, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.



EIGHTY NINTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI AND SAUL SALAMA OF MONEY LAUNDERING  
IN THE FOURTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER AND ACTING IN CONCERT  
WITH OTHER PERSONS, ON OR ABOUT FEBRUARY 17, 2015 IN THE COUNTY OF  
QUEENS AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS  
REPRESENTED THE PROCEEDS OF CRIMINAL CONDUCT, TRANSPORTED,  
TRANSMITTED OR TRANSFERRED ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS  
WHICH IN FACT REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT,  
WITH THE INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT, AND  
THE TOTAL VALUE OF SUCH MONETARY INSTRUMENT OR INSTRUMENTS EXCEEDED  
TEN THOUSAND DOLLARS.

NINETIETH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO, CLARK W  
BRUNER, CLARK OLIVER BRUNER AND CHRISTOPHER BRUNER OF PROMOTING GAMBLING  
IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT FEBRUARY 23, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

NINETY FIRST COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO, CLARK W  
BRUNER, CLARK OLIVER BRUNER AND CHRISTOPHER BRUNER OF PROMOTING GAMBLING  
IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT FEBRUARY 24, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

NINETY SECOND COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO, CLARK W  
BRUNER, CLARK OLIVER BRUNER AND CHRISTOPHER BRUNER OF PROMOTING GAMBLING  
IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT FEBRUARY 25, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

NINETY THIRD COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO, CLARK W  
BRUNER, CLARK OLIVER BRUNER AND CHRISTOPHER BRUNER OF PROMOTING GAMBLING  
IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT FEBRUARY 26, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

NINETY FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO, CLARK W  
BRUNER, CLARK OLIVER BRUNER AND CHRISTOPHER BRUNER OF PROMOTING GAMBLING  
IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT FEBRUARY 27, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

NINETY FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO, CASSONDRA  
SMITH-LUTTMAN, CLARK W BRUNER, CLARK OLIVER BRUNER AND CHRISTOPHER  
BRUNER OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT FEBRUARY 28, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

NINETY SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SAUL SALAMA, SALLY MEDINA-CABELLO,  
CLARK W BRUNER, CLARK OLIVER BRUNER AND CHRISTOPHER BRUNER OF  
PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT MARCH 01, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.



NINETY SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SAUL SALAMA, SALLY MEDINA-CABELLO,  
CLARK W BRUNER, CLARK OLIVER BRUNER AND CHRISTOPHER BRUNER OF  
PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT MARCH 02, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

NINETY EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO, CLARK W  
BRUNER, CLARK OLIVER BRUNER AND CHRISTOPHER BRUNER OF PROMOTING GAMBLING  
IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT MARCH 03, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

NINETY NINTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO, CLARK W  
BRUNER, CLARK OLIVER BRUNER AND CHRISTOPHER BRUNER OF PROMOTING GAMBLING  
IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT MARCH 04, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

ONE HUNDREDTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO, CLARK W  
BRUNER, CLARK OLIVER BRUNER AND CHRISTOPHER BRUNER OF PROMOTING GAMBLING  
IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT MARCH 05, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

ONE HUNDRED AND FIRST COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, CLARK W BRUNER AND CLARK OLIVER  
BRUNER OF MONEY LAUNDERING IN THE FOURTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT MARCH 10, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED THE  
PROCEEDS OF CRIMINAL CONDUCT, TRANSPORTED, TRANSMITTED OR TRANSFERRED  
ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED  
THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH THE INTENT TO PROMOTE  
THE CARRYING ON OF CRIMINAL CONDUCT, AND THE TOTAL VALUE OF SUCH  
MONETARY INSTRUMENT OR INSTRUMENTS EXCEEDED TEN THOUSAND DOLLARS.

ONE HUNDRED AND SECOND COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO AND CASSONDRA  
SMITH-LUTTMAN OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS  
FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT MARCH 11, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

ONE HUNDRED AND THIRD COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SAUL SALAMA, SALLY MEDINA-CABELLO  
AND THOMAS CORTESE OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED  
AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT MARCH 20, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

ONE HUNDRED AND FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO, THOMAS CORTESE  
AND CASSONDRA SMITH-LUTTMAN OF PROMOTING GAMBLING IN THE FIRST DEGREE  
COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT MARCH 22, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.



ONE HUNDRED AND FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO AND CASSONDRA  
SMITH-LUTTMAN OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS  
FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT MARCH 25, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

ONE HUNDRED AND SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO AND THOMAS  
CORTESE OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT MARCH 26, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

ONE HUNDRED AND SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO AND THOMAS  
CORTESE OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT MARCH 27, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

ONE HUNDRED AND EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO AND THOMAS  
CORTESE OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT MARCH 28, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

ONE HUNDRED AND NINTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SALLY MEDINA-CABELLO AND THOMAS  
CORTESE OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT MARCH 29, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

ONE HUNDRED AND TENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, RICHARD VANDERWYK, CLARK W BRUNER  
AND CHRISTOPHER BRUNER OF MONEY LAUNDERING IN THE FOURTH DEGREE  
COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT APRIL 07, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED THE  
PROCEEDS OF CRIMINAL CONDUCT, TRANSPORTED, TRANSMITTED OR TRANSFERRED  
ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED  
THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH THE INTENT TO PROMOTE  
THE CARRYING ON OF CRIMINAL CONDUCT, AND THE TOTAL VALUE OF SUCH  
MONETARY INSTRUMENT OR INSTRUMENTS EXCEEDED TEN THOUSAND DOLLARS.

ONE HUNDRED AND ELEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, RICHARD VANDERWYK AND CLARK W BRUNER  
OF MONEY LAUNDERING IN THE FOURTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT APRIL 17, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED THE  
PROCEEDS OF CRIMINAL CONDUCT, TRANSPORTED, TRANSMITTED OR TRANSFERRED  
ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED  
THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH THE INTENT TO PROMOTE  
THE CARRYING ON OF CRIMINAL CONDUCT, AND THE TOTAL VALUE OF SUCH  
MONETARY INSTRUMENT OR INSTRUMENTS EXCEEDED TEN THOUSAND DOLLARS.

ONE HUNDRED AND TWELFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, CLARK W BRUNER AND CLARK OLIVER  
BRUNER OF MONEY LAUNDERING IN THE FOURTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT MAY 04, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED THE  
PROCEEDS OF CRIMINAL CONDUCT, TRANSPORTED, TRANSMITTED OR TRANSFERRED  
ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED  
THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH THE INTENT TO PROMOTE  
THE CARRYING ON OF CRIMINAL CONDUCT, AND THE TOTAL VALUE OF SUCH  
MONETARY INSTRUMENT OR INSTRUMENTS EXCEEDED TEN THOUSAND DOLLARS.



ONE HUNDRED AND THIRTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI AND MICHAEL GALLAGHER OF MONEY  
LAUNDERING IN THE FOURTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER AND ACTING IN CONCERT  
WITH OTHER PERSONS, ON OR ABOUT MAY 15, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED THE  
PROCEEDS OF CRIMINAL CONDUCT, TRANSPORTED, TRANSMITTED OR TRANSFERRED  
ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED  
THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH THE INTENT TO PROMOTE  
THE CARRYING ON OF CRIMINAL CONDUCT, AND THE TOTAL VALUE OF SUCH  
MONETARY INSTRUMENT OR INSTRUMENTS EXCEEDED TEN THOUSAND DOLLARS.

ONE HUNDRED AND FOURTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, DAVID CHANG AND CLARK W BRUNER OF  
MONEY LAUNDERING IN THE FOURTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT MAY 29, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED THE  
PROCEEDS OF CRIMINAL CONDUCT, TRANSPORTED, TRANSMITTED OR TRANSFERRED  
ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED  
THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH THE INTENT TO PROMOTE  
THE CARRYING ON OF CRIMINAL CONDUCT, AND THE TOTAL VALUE OF SUCH  
MONETARY INSTRUMENT OR INSTRUMENTS EXCEEDED TEN THOUSAND DOLLARS.

ONE HUNDRED AND FIFTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI AND SAUL SALAMA OF MONEY LAUNDERING  
IN THE FOURTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER AND ACTING IN CONCERT  
WITH OTHER PERSONS, ON OR ABOUT JUNE 04, 2015 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED  
THE PROCEEDS OF CRIMINAL CONDUCT, TRANSPORTED, TRANSMITTED OR  
TRANSFERRED ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT  
REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH THE  
INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT, AND THE TOTAL  
VALUE OF SUCH MONETARY INSTRUMENT OR INSTRUMENTS EXCEEDED TEN THOUSAND  
DOLLARS.

ONE HUNDRED AND SIXTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SAUL SALAMA AND SALLY MEDINA-CABELLO  
OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT JUNE 28, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

ONE HUNDRED AND SEVENTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, RICHARD VANDERWYK AND CLARK W BRUNER  
OF MONEY LAUNDERING IN THE THIRD DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT JUNE 29, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWING THAT THE PROPERTY INVOLVED IN ONE OR MORE FINANCIAL  
TRANSACTIONS REPRESENTED THE PROCEEDS OF CRIMINAL CONDUCT, CONDUCTED ONE  
OR MORE SUCH FINANCIAL TRANSACTIONS, AS FOLLOWS: THE EXCHANGE OF ILLEGAL  
SPORTS GAMBLING PROCEEDS, WHICH IN FACT INVOLVED THE PROCEEDS OF  
SPECIFIED CRIMINAL CONDUCT, WHICH IN FACT INVOLVED THE PROCEEDS OF  
SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE CARRYING ON OF  
CRIMINAL CONDUCT, AND THE TOTAL VALUE OF THE PROPERTY INVOLVED IN SUCH  
FINANCIAL TRANSACTION OR TRANSACTIONS EXCEEDED FIFTY THOUSAND DOLLARS.

ONE HUNDRED AND EIGHTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI AND CLARK W BRUNER OF MONEY  
LAUNDERING IN THE FOURTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER AND ACTING IN CONCERT  
WITH OTHER PERSONS, ON OR ABOUT JUNE 30, 2015 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED  
THE PROCEEDS OF CRIMINAL CONDUCT, TRANSPORTED, TRANSMITTED OR  
TRANSFERRED ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT  
REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH THE  
INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT, AND THE TOTAL  
VALUE OF SUCH MONETARY INSTRUMENT OR INSTRUMENTS EXCEEDED TEN THOUSAND  
DOLLARS.

ONE HUNDRED AND NINETEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, RICHARD VANDERWYK, DAVID CHANG AND  
CLARK W BRUNER OF MONEY LAUNDERING IN THE FOURTH DEGREE COMMITTED AS  
FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT JULY 01, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED THE  
PROCEEDS OF CRIMINAL CONDUCT, TRANSPORTED, TRANSMITTED OR TRANSFERRED  
ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT REPRESENTED  
THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH THE INTENT TO PROMOTE  
THE CARRYING ON OF CRIMINAL CONDUCT, AND THE TOTAL VALUE OF SUCH  
MONETARY INSTRUMENT OR INSTRUMENTS EXCEEDED TEN THOUSAND DOLLARS.

ONE HUNDRED AND TWENTIETH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SAUL SALAMA AND SALLY MEDINA-CABELLO  
OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT JULY 02, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.



ONE HUNDRED AND TWENTY FIRST COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SAUL SALAMA AND SALLY MEDINA-CABELLO  
OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT JULY 03, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

ONE HUNDRED AND TWENTY SECOND COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI AND DAVID CHANG OF MONEY LAUNDERING  
IN THE FOURTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER AND ACTING IN CONCERT  
WITH OTHER PERSONS, ON OR ABOUT JULY 16, 2015 IN THE COUNTY OF QUEENS  
AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS REPRESENTED  
THE PROCEEDS OF CRIMINAL CONDUCT, TRANSPORTED, TRANSMITTED OR  
TRANSFERRED ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS WHICH IN FACT  
REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT, WITH THE  
INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT, AND THE TOTAL  
VALUE OF SUCH MONETARY INSTRUMENT OR INSTRUMENTS EXCEEDED TEN THOUSAND  
DOLLARS.

ONE HUNDRED AND TWENTY THIRD COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SAUL SALAMA AND SALLY MEDINA-CABELLO  
OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT JULY 31, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL GAMBLING  
ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY RECEIVED OR  
ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE THAN FIVE  
THOUSAND DOLLARS.

ONE HUNDRED AND TWENTY FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, DAVID CHANG AND CLARK W BRUNER OF  
MONEY LAUNDERING IN THE THIRD DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT WITH  
OTHER PERSONS, ON OR ABOUT AUGUST 05, 2015 IN THE COUNTY OF QUEENS AND  
ELSEWHERE, KNOWING THAT THE PROPERTY INVOLVED IN ONE OR MORE FINANCIAL  
TRANSACTIONS REPRESENTED THE PROCEEDS OF CRIMINAL CONDUCT, CONDUCTED ONE  
OR MORE SUCH FINANCIAL TRANSACTIONS, AS FOLLOWS: THE EXCHANGE OF ILLEGAL  
SPORTS GAMBLING PROCEEDS, WHICH IN FACT INVOLVED THE PROCEEDS OF  
SPECIFIED CRIMINAL CONDUCT, WHICH IN FACT INVOLVED THE PROCEEDS OF  
SPECIFIED CRIMINAL CONDUCT, WITH INTENT TO PROMOTE THE CARRYING ON OF  
CRIMINAL CONDUCT, AND THE TOTAL VALUE OF THE PROPERTY INVOLVED IN SUCH  
FINANCIAL TRANSACTION OR TRANSACTIONS EXCEEDED FIFTY THOUSAND DOLLARS.

ONE HUNDRED AND TWENTY FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI AND JEFFREY METELITZ OF MONEY  
LAUNDERING IN THE FOURTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER AND ACTING IN CONCERT  
WITH OTHER PERSONS, ON OR ABOUT AUGUST 11, 2015 IN THE COUNTY OF  
QUEENS AND ELSEWHERE, KNOWING THAT ONE OR MORE MONETARY INSTRUMENTS  
REPRESENTED THE PROCEEDS OF CRIMINAL CONDUCT, TRANSPORTED,  
TRANSMITTED OR TRANSFERRED ONE OR MORE OCCASIONS, MONETARY INSTRUMENTS  
WHICH IN FACT REPRESENTED THE PROCEEDS OF SPECIFIED CRIMINAL CONDUCT,  
WITH THE INTENT TO PROMOTE THE CARRYING ON OF CRIMINAL CONDUCT, AND  
THE TOTAL VALUE OF SUCH MONETARY INSTRUMENT OR INSTRUMENTS EXCEEDED  
TEN THOUSAND DOLLARS.

ONE HUNDRED AND TWENTY SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANTS CYRUS IRANI, SAUL SALAMA AND SALLY  
MEDINA-CABELLO OF PROMOTING GAMBLING IN THE FIRST DEGREE COMMITTED AS  
FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS AND ACTING IN CONCERT  
WITH OTHER PERSONS, ON OR ABOUT SEPTEMBER 07, 2015 IN THE COUNTY OF  
QUEENS AND ELSEWHERE, KNOWINGLY ADVANCED OR PROFITED FROM UNLAWFUL  
GAMBLING ACTIVITY BY ENGAGING IN BOOKMAKING TO THE EXTENT THAT THEY  
RECEIVED OR ACCEPTED IN ANY ONE DAY MORE THAN FIVE BETS TOTALING MORE  
THAN FIVE THOUSAND DOLLARS.

A handwritten signature in blue ink, appearing to read 'Richard A. Brown', with a horizontal line underneath.

RICHARD A. BROWN  
DISTRICT ATTORNEY