

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
GERMAN QUILES	:	VIOLATIONS:
MARIA QUILES	:	18 U.S.C. § 1956(h) (conspiracy to commit
GLORIA QUILES	:	money laundering - 1 count)
	:	18 U.S.C. § 1956(a)(3)(B) (money
	:	laundering - 16 counts)
		18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Defendant GERMAN QUILES was the owner and operator of Aruba Incorporated (“Aruba”), d/b/a Aruba Auto Tag Service and Aruba Check Cashing, located at 2201 N. 5th Street, Philadelphia, Pennsylvania. Aruba is a money transfer center, offering domestic and international money transmitting services to the public, in addition to check cashing, money order sales, translation, immigration counseling and automobile registration. Defendant GERMAN QUILES was assisted by his wife, defendant MARIA QUILES, and daughter, defendant GLORIA QUILES, in operating Aruba.

2. Defendant GERMAN QUILES was an authorized money transmitter for Moneygram Corporation, a licensed money transmitter in the state of Pennsylvania. Moneygram Corporation has more than 5,000 money transfer locations throughout the United States and is

required to comply with the anti-money laundering and currency reporting requirements of the Bank Secrecy Act, 31 U.S.C. § 5311 et. seq.

3. Moneygram Corporation provided training to each of its agents, including defendants GERMAN QUILES and MARIA QUILES, on the money laundering laws and currency reporting requirements. This company provided manuals and updates to all of its agents specifically advising agents as to the laws regarding illegal money laundering, the sanctions for illegal money laundering, and the requirements for reporting suspicious transactions. As the compliance officer, defendant GERMAN QUILES, certified that he trained all employees accordingly.

4. Defendants GERMAN QUILES, MARIA QUILES, and GLORIA QUILES received training manuals and other documentation and information from Moneygram Corporation regarding the reporting requirements and the possible criminal penalties associated with violating the anti-money laundering and currency transaction reporting requirements of the Bank Secrecy Act. The defendants retained these training manuals and other documents and information on the premises of Aruba. Defendant GERMAN QUILES was the compliance officer for anti-money laundering and Bank Secrecy Act training for Aruba.

5. Defendants GERMAN QUILES, MARIA QUILES, and GLORIA QUILES conducted financial transactions which were represented to them by a confidential source (CS), working at the direction of federal officials, to be the proceeds of illegal drug trafficking, in violation of Title 21, United States Code, Section 841. Specifically, with regard to these funds, the defendants arranged for international transfers of money, exchanged cash for international money orders and converted small denomination U.S. currency bills to \$100 bills.

The defendants structured the transactions to evade and defeat the currency transaction reporting requirements and permitted the use of false identification and fictitious names to prevent discovery of the sender's true identity and to evade the reporting requirements.

6. From in or about September 2006 to in or about January 2007, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**GERMAN QUILES,
MARIA QUILES, and
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conspired and agreed, together and with others known and unknown to the grand jury, to commit an offense against the United States, that is, to knowingly launder money by conducting and attempting to conduct financial transactions of property represented to be proceeds of a specified unlawful activity, that is drug distribution, with the intent to conceal and disguise the nature, location, source, ownership, or control of property believed to be the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(3)(B).

MANNER AND MEANS

7. It was part of the conspiracy that defendants GERMAN QUILES, MARIA QUILES, and GLORIA QUILES offered Aruba's financial services to a confidential source (CS) who, at the direction of law enforcement, advised the defendants that the money involved in the financial transactions did not belong to him and were the proceeds of drug distribution.

It was further part of the conspiracy that:

8. Defendants GERMAN QUILES, MARIA QUILES, and GLORIA QUILES wired money represented by the CS to be drug proceeds from Aruba to the Dominican

Republic, exchanged currency to international money orders and converted the money from small denominations of U.S. currency to \$100 bills.

OVERT ACTS

In furtherance of the conspiracy, defendants GERMAN QUILES, MARIA QUILES, and GLORIA QUILES, and others known and unknown to the grand jury, committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. On or about September 20, 2006, defendants GERMAN QUILES and MARIA QUILES laundered for the CS approximately \$7000 in cash represented to be drug proceeds. The defendants issued approximately \$3500 in international money orders and converted the remaining approximately \$3500 from small denominations of U.S. currency to \$100 bills.

2. On or about September 21, 2006, defendant GERMAN QUILES laundered for the CS approximately \$8000 in cash. The defendant issued approximately \$3000 in international money orders and converted the remaining approximately \$5000 from small denominations of U.S. currency to \$100 bills. In addition, the CS left approximately \$5000 in cash with defendant GERMAN QUILES who stated he would convert the money to money orders the following day in order to avoid suspicion.

3. On or about September 22, 2006, the CS returned to Aruba. Defendant GERMAN QUILES laundered approximately \$5000 in cash for the CS by issuing the CS approximately \$5000 in international money orders.

4. On or about September 25, 2006, defendant GERMAN QUILES laundered approximately \$6000 in cash for the CS. The defendant converted approximately \$4000 in small denominations of U.S. currency to \$100 bills and issued approximately \$2000 in international money orders to the CS.

5. On or about October 2, 2006, defendants GERMAN QUILES and MARIA QUILES laundered approximately \$8500 in cash for the CS. The defendant converted approximately \$7000 in small denominations of U.S. currency to \$100 bills and issued approximately \$1500 in international money orders to the CS.

6. On or about October 3, 2006, defendants GERMAN QUILES, MARIA QUILES, and GLORIA QUILES laundered approximately \$19,500 for the CS. The defendant sent two \$1000 wire transfers to the Dominican Republic for the CS even after the CS told defendant GERMAN QUILES that he was sending the money for someone else. Defendant GERMAN QUILES also converted approximately \$17,000 in cash to \$100 bills for the CS and issued approximately \$500 in international money orders.

7. Approximately two weeks later on or about October 19, 2006, defendants GERMAN QUILES and MARIA QUILES laundered approximately \$16,000 in cash for the CS. The defendants sent a \$2000 wire transfer to the Dominican Republic for the CS knowing that the money belonged to someone else. The defendants also issued approximately \$2500 in international money orders and converted approximately \$11,500 in small denominations of U.S. currency to \$100 bills for the CS.

8. The next day, on or about October 20, 2006, defendants GERMAN QUILES and MARIA QUILES laundered approximately \$17,000 for the CS. The defendants

converted approximately \$15,000 to \$100 bills and issued approximately \$2000 in international money orders for the CS.

9. On or about November 2, 2006, the CS discussed with defendants GERMAN QUILES, MARIA QUILES, and GLORIA QUILES that the money was drug money. After this conversation, defendant laundered approximately \$18,000 in cash for the CS. The defendants wired another approximately \$2000 to the Dominican Republic for the CS. They also issued approximately \$2000 in international money orders and converted \$14,000 from small bills to \$100 bills for the CS.

10. The next day, on or about November 3, 2006, defendants GERMAN QUILES and MARIA QUILES laundered approximately \$12,000 in cash for the CS when they converted approximately \$12,000 from small denominations of U.S. currency to \$100 bills.

11. On or about December 6, 2006, defendant GERMAN QUILES was working with his daughter, defendant GLORIA QUILES, when the CS again advised them that the money with which he was dealing was drug money. Defendants GERMAN QUILES and GLORIA QUILES then laundered approximately \$6000 in cash for the CS. The defendants issued approximately \$2000 in international money orders and converted approximately \$4000 from small denominations of U.S. currency to \$100 bills for the CS.

12. On or about December 7, 2006, defendants GERMAN QUILES and GLORIA QUILES laundered approximately \$22,000 in cash for the CS. The defendants issued approximately \$2000 in international money orders and converted approximately \$20,000 in small denominations of U.S. currency to \$100 bills for the CS.

13. On or about December 8, 2006, defendants GERMAN QUILES and GLORIA QUILES laundered approximately \$4000 in cash for the CS. The defendants issued another approximately \$2000 in international money orders and converted approximately \$2000 from small denominations of U.S. currency to \$100 bills for the CS.

14. On or about January 10, 2007, defendants GERMAN QUILES, MARIA QUILES, and GLORIA QUILES laundered approximately \$3000 in cash for the CS. The defendants issued \$2000 in international money orders and converted \$1000 in small denominations of U.S. currency to \$100 bills for the CS.

15. On or about January 11, 2007, defendants GERMAN QUILES and GLORIA QUILES laundered approximately \$7000 in cash for the CS when they converted approximately \$7000 in small denominations of U.S. currency to \$100 bills.

16. On or about January 12, 2007, defendants MARIA QUILES and GLORIA QUILES laundered approximately \$10,900 for the CS. The defendants issued approximately \$4000 in international money orders and converted approximately \$6900 from small denominations of U.S. currency to \$100 bills for the CS.

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

COUNTS TWO THROUGH SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 - 5 and 7-8 and overt acts 1-16 of Count One are incorporated here.
2. On or about the dates set forth below, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**GERMAN QUILES,
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knowingly conducted, and aided and abetted the conducting of, the following financial transactions affecting interstate commerce:

COUNT	DATE	AMOUNT LAUNDERED	DEFENDANTS' FEES
Two	9/20/06	\$7000	\$500
Three	9/21/06	\$8000	\$400
Four	9/22/06	\$9000	\$500
Five	9/25/06	\$6000	\$300
Six	10/2/06	\$8500	\$500
Seven	10/3/06	\$21,500	\$1200
Eight	10/19/06	\$16,000	\$1000
Nine	10/20/06	\$17,000	\$900
Ten	11/2/06	\$18,000	\$900
Eleven	11/3/06	\$12,000	\$600
Twelve	12/6/06	\$6000	\$300
Thirteen	12/7/06	\$22,000	\$1100
Fourteen	12/8/06	\$4000	\$200

Fifteen	1/10/07	\$3000	\$200
Sixteen	1/11/07	\$7000	\$400
Seventeen	1/12/07	\$10,900	\$600
		Total: \$175,900	Total: \$9800

3. When conducting the financial transactions described above, defendants GERMAN QUILES, MARIA QUILES, and GLORIA QUILES acted with the intent to conceal and disguise the nature, location, source, ownership and control of what they believed were the proceeds of specified unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(3)(B) and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1956, set forth in this indictment, defendants

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shall forfeit to the United States of America any and all property involved in such offenses, and any property traceable to such property, including, but not limited to, the sum of \$131,575.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

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

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

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

A TRUE BILL:

GRAND JURY FOREPERSON

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**