

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

- X. JOHN KINAHAN
(a.k.a. "JK")
DEFENDANT
- X. VIRGINIA KINAHAN
(a.k.a. "Ginger")
DEFENDANT
- X. PHILIP BUCKLES
DEFENDANT
- X. JOHN MORRISSEY
(a.k.a. "Bubba")
DEFENDANT
- X. STEPHEN DEFRANCO
DEFENDANT
- X. JEREMIAH KEATING
DEFENDANT
- X. ANGELO NEOS
DEFENDANT
- X. TIMOTHY O'CONNELL
DEFENDANT
- X. CRAIG SULLIVAN
DEFENDANT
- X. LEO STERN
DEFENDANT

FILED:

INDICTMENT NO. 810/2007

X. WAI KONG
DEFENDANT

X. PETER SONG
DEFENDANT

X. ANDREW LAMPARTER
DEFENDANT

X. GLENN MULHERN
DEFENDANT

X. SAAVAS KARAMATZANIS
DEFENDANT

X. SALVATORE VAGLICA
DEFENDANT

X. DONNY LNU
DEFENDANT

PL 460.20-1(a) ENTERPRISE CORRUPTION

(1) John Kinahan
Virginia Kinahan
Philip Buckles
John Morrissey
Stephen DeFranco
Jeremiah Keating
Angelo Neos
Timothy O'Connell
Craig Sullivan
Leo Stern
Wai Kong
Peter Song
Andrew Lamparter
Glenn Mulhern
Saavas
Karamatzanis
Salvatore Vaglica
Donny LNU

PL 225.10-1	PROMOTING GAMBLING IN THE FIRST DEGREE	(9)	John Kinahan Virginia Kinahan Philip Buckles John Morrissey Stephen DeFranco Angelo Neos Leo Stern Wai Kong Peter Song Andrew Lamparter Glenn Mulhern Saavas Karamatzanis Donny LNU
PL 225.10-1	PROMOTING GAMBLING IN THE FIRST DEGREE	(10)	John Kinahan Virginia Kinahan Philip Buckles John Morrissey Stephen DeFranco Angelo Neos Leo Stern Wai Kong Peter Song Andrew Lamparter Glenn Mulhern Donny LNU
PL 225.10-1	PROMOTING GAMBLING IN THE FIRST DEGREE	(11)	John Kinahan Virginia Kinahan Philip Buckles John Morrissey Stephen DeFranco Jeremiah Keating Angelo Neos Timothy O'Connell Leo Stern Wai Kong Peter Song Andrew Lamparter Glenn Mulhern Saavas Karamatzanis Donny LNU

FIRST COUNT

The Grand Jury of the County of Queens, by this indictment, accuse the defendants **John Kinahan (a.k.a. "JK")**, **Virginia Kinahan (a.k.a. "Ginger")**, **Philip Buckles**, **John Morrissey (a.k.a. "Bubba")**, **Stephen DeFranco**, **Jeremiah Keating**, **Angelo Neos**, **Timothy O'Connell**, **Craig Sullivan**, **Leo Stern**, **Wai Kong**, **Peter Song**, **Andrew Lamparter**, **Glenn Mulhern**, **Saavas Karamatzanis**, **Salvatore Vaglica**, **Donny LNU** 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 May 1, 2006, and March 22, 2007, having knowledge of the existence of a criminal enterprise, to wit, the "Kinahan Gambling Organization", 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

At all times relevant to the First Count:

1. The defendants **John Kinahan**, **Virginia Kinahan**, **Philip Buckles**, **John Morrissey**, **Stephen DeFranco**, **Jeremiah Keating**, **Angelo Neos**, **Timothy O'Connell**, **Craig Sullivan**, **Leo Stern**, **Wai Kong**, **Peter Song**, **Andrew Lamparter**, **Glenn Mulhern**, **Saavas Karamatzanis**, **Salvatore**

Vaglica, Donny LNU, along with other persons known and unknown, were members of or were associated with an enterprise in which they shared a common purpose of engaging in criminal conduct and were associated in a structure both that was distinct from the pattern of criminal activity and that had a continuity of existence, structure and criminal purpose beyond the scope of individual criminal incidents.

2. The defendants were members of the Kinahan Gambling Organization that operated an unlawful gambling enterprise in Queens County and elsewhere. The Kinahan Gambling Organization constituted a "criminal enterprise" as that term is defined in Penal Section 460.10(3).

3. There were other members of the Kinahan Gambling Organization not named herein as defendants who were employed by or associated with said organization.

THE PURPOSES AND STRUCTURE OF THE CRIMINAL ENTERPRISE

4. The common purpose of the members and associates of the Kinahan Gambling Organization was to engage in criminal conduct and to acquire money illegally through the promotion of gambling activity, including the unlawful acceptance of bets from members of the public as a business, upon the outcomes of future contingent events.

5. The Criminal Enterprise consisted of a bookmaker, a bookkeeper, super-agents/ distributors, agents/runners, which conducted business as follows:

a. The bookmaker, **John Kinahan**, controlled and oversaw the enterprise, constituting the final authority on decisions affecting the overall operation of the enterprise.

b. The bookkeeper, **Virginia Kinahan**, managed the day-to-day affairs of the operation, handled bettor disputes and accounting discrepancies, dealt with issues regarding personnel and resources, and managed account information of the various runners and bettors.

c. The agents/runners, **Stephen DeFranco, Jeremiah Keating, Angelo Neos, Timothy O'Connell, Craig Sullivan, Leo Stern, Wai Kong, Peter Song, Andrew Lamparter, Glenn Mulhern, Saavas Karamatzanis, Salvatore Vaglica, Donny LNU**, were responsible for soliciting new bettors to the organization, maintaining existing bettor relationships, and meeting with their bettors to collect gambling losses and payout winnings resulting from bets placed by the bettors with the organization.

d. Distributors, including **John Morrissey** and **Philip Buckles**, were in effect "super-agents/super-runners" as each distributor had several subordinate agents/runners reporting directly to the distributor, and each of these subordinate agents/runners has several bettors with whom the dealt directly.

6. The Kinahan Gambling Organization conducted this gambling business in the form of a gambling operation as follows:

a. Bets on future contingent events, including various sporting events, such as upcoming professional baseball and football games, are accepted by this gambling operation primarily through

several toll-free telephone numbers, accessible from telephones located in Queens County and elsewhere, and through an Internet website, www.50Ksports.com, which is accessible from computers connected to the Internet in Queens County and elsewhere. This Internet website and the toll-free telephone numbers are managed by the bookkeeper and the super-agents, under the overall supervision of the bookmaker. The communications and Internet services providers.

b. After a bettor places a bet through one of these media, the bettor subsequently typically either meets with an agent/runner.

c. The agent/runner typically meets with the super-agents or the bookmaker to give the super-agents or bookmaker any gambling debts the agent/runner collected from his bettors and to receive any money from the super-agents or bookmaker that the bettors of the agent/runner won.

d. The bookmaker, bookkeeper, and other members of the organization then conduct various financial transactions with the gambling proceeds to: promote the carrying on of this operation; conceal or disguise the nature, location, source, ownership, or control of the gambling proceeds; or avoid any transaction reporting requirement imposed by law.

f. The bookmaker constituted the ultimate decision-making authority in the organization.

PATTERN OF CRIMINAL ACTIVITY

During the period of this offense, each of the defendants, with intent to participate in and advance the affairs of the criminal

enterprise and pursuant to a common scheme and plan, engaged in conduct constituting or was criminally liable for the following criminal acts included within a pattern of criminal activity:

PATTERN ACT ONE

The defendants **John Kinahan, Virginia Kinahan, Philip Buckles, John Morrissey, Stephen DeFranco, Jeremiah Keating, Angelo Neos, Timothy O'Connell, Craig Sullivan, Leo Stern, Peter Song, Andrew Lamparter, Glenn Mulhern, Salvatore Vaglica**, 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 11, 2006, 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 five thousand dollars.

PATTERN ACT TWO

The defendants **John Kinahan, Virginia Kinahan, Philip Buckles, John Morrissey, Stephen DeFranco, Jeremiah Keating,, Glenn Mulhern, Saavas Karamatzanis, Salvatore Vaglica**, 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 12, 2006, 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 five thousand dollars.

PATTERN ACT THREE

The defendants **John Kinahan, Virginia Kinahan, Philip Buckles, John Morrissey, Stephen DeFranco, Jeremiah Keating, Angelo Neos, Timothy O'Connell, Craig Sullivan,, Wai Kong, Andrew Lamparter, Glenn Mulhern, Salvatore Vaglica, Donny LNU**, 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 13, 2006, 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 five thousand dollars.

PATTERN ACT FOUR

The defendants **John Kinahan, Virginia Kinahan, Philip Buckles, John Morrissey, Stephen DeFranco, Jeremiah Keating, Angelo Neos, Timothy O'Connell, Craig Sullivan, Leo Stern, Andrew Lamparter, Glenn Mulhern, Saavas Karamatzanis, Salvatore Vaglica, Donny LNU**, 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 14, 2006, 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 five thousand dollars.

PATTERN ACT FIVE

The defendants **John Kinahan, Virginia Kinahan, Philip**

Buckles, John Morrissey, Stephen DeFranco, Jeremiah Keating, Angelo Neos, Timothy O'Connell, Craig Sullivan, Leo Stern, Andrew Lamparter, Glenn Mulhern, Saavas Karamatzanis, Salvatore Vaglica, Donny LNU, 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 15, 2006, 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 five thousand dollars.

PATTERN ACT SIX

The defendants **John Kinahan, Virginia Kinahan, Philip Buckles, John Morrissey, Stephen DeFranco, Jeremiah Keating, Angelo Neos, Timothy O'Connell, Craig Sullivan, Leo Stern, Andrew Lamparter, Glenn Mulhern, Saavas Karamatzanis, Salvatore Vaglica, Donny LNU,** 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 16, 2006, 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 five thousand dollars.

PATTERN ACT SEVEN

The defendants **John Kinahan, Virginia Kinahan, Philip Buckles, John Morrissey, Stephen DeFranco, Jeremiah Keating, Angelo Neos, Timothy O'Connell, Craig Sullivan, Leo Stern, Wai Kong, Peter Song,**

Andrew Lamparter, Glenn Mulhern, Saavas Karamatzanis, Salvatore Vaglica, Donny LNU, 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 17, 2006, 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 five thousand dollars.

PATTERN ACT EIGHT

The defendants **John Kinahan, Virginia Kinahan, Philip Buckles, John Morrissey, Stephen DeFranco, Angelo Neos, Leo Stern, Wai Kong, Peter Song, Andrew Lamparter, Glenn Mulhern, Saavas Karamatzanis, Donny LNU,** 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 4, 2006, 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 five thousand dollars.

PATTERN ACT NINE

The defendants **John Kinahan, Virginia Kinahan, Philip Buckles, John Morrissey, Stephen DeFranco, Angelo Neos, Leo Stern, Wai Kong, Peter Song, Andrew Lamparter, Glenn Mulhern, Donny LNU,** 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 5, 2006, 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 five thousand dollars.

PATTERN ACT TEN

The defendants **John Kinahan, Virginia Kinahan, Philip Buckles, John Morrissey, Stephen DeFranco, Angelo Neos, Timothy O'Connell, Leo Stern, Wai Kong, Peter Song, Andrew Lamparter, Glenn Mulhern, Saavas Karamatzanis, Donny LNU**, 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 6, 2006, 2006, 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 five thousand dollars.

PATTERN ACT ELEVEN

The defendants **John Kinahan, Virginia Kinahan, Philip Buckles, John Morrissey, Stephen DeFranco, Angelo Neos, Timothy O'Connell, Leo Stern, Wai Kong, Peter Song, Andrew Lamparter, Glenn Mulhern, Saavas Karamatzanis, Donny LNU**, 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, 2006, 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 five thousand dollars.

PATTERN ACT TWELVE

The defendants **John Kinahan, Virginia Kinahan, Philip Buckles, John Morrissey, Stephen DeFranco, Saavas Karamatzanis, Donny LNU,** 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 8, 2006, 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 five thousand dollars.

PATTERN ACT THIRTEEN

The defendants **John Kinahan, Virginia Kinahan, Philip Buckles, John Morrissey, Stephen DeFranco, Angelo Neos, Timothy O'Connell, Craig Sullivan, Leo Stern, Wai King, Peter Song, Andrew Lamparter, Glenn Mulhern,** 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 9, 2006, 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 five thousand dollars.

PATTERN ACT FOURTEEN

The defendants **John Kinahan, Virginia Kinahan, Philip Buckles, John Morrissey, Stephen DeFranco, Angelo Neos, Timothy O'Connell, Craig Sullivan, Leo Stern, Wai Kong, Peter Song, Andrew Lamparter, Glenn Mulhern, Saavas Karamatzanis, Salvatore Vaglica, Donny LNU**, 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 10, 2006, 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 five thousand dollars.

PATTERN ACT #15

The defendants **John Kinahan, Virginia Kinahan, Philip Buckles, John Morrissey, Stephen DeFranco, Jeremiah Keating, Angelo Neos, Timothy O'Connell, Craig Sullivan, Leo Stern, Wai Kong, Peter Song, Andrew Lamparter, Glenn Mulhern, Saavas Karamatzanis, Salvatore Vaglica, Donny LNU** committed the crime of **CONSPIRACY IN THE FIFTH DEGREE** in violation of Penal Law §105.05(1), in that on or about and between May 1, 2006, and March 22, 2007, 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.

It was a purpose of this conspiracy to acquire money through the operation of an unlawful gambling enterprise involving the use of an Internet website, www.50ksports.com, where bets on future

contingent events could be placed and the organization's gambling records could be accessed. At all times relevant to this indictment, defendant **John Kinahan** controlled entire gambling enterprise, which accepted bets, solicited new bettors, and conducted financial transactions in many locations including Queens County, New York, and elsewhere.

As part of this conspiracy, and at various times relevant to this indictment, this organization collected, distributed, and transferred these illegal gambling proceeds via its agents/runners, super-agents, and bookmaker: **John Kinahan, Philip Buckles, John Morrissey, Stephen DeFranco, Jeremiah Keating, Angelo Neos, Timothy O'Connell, Craig Sullivan, Leo Stern, Wai Kong, Peter Song, Andrew Lamparter, Glenn Mulhern, Saavas Karamatzanis, Salvatore Vaglica,** and **Donny LNU,** and with the assistance of a bookkeeper: **Virginia Kinahan.**

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:

1. On or about May 9, 2006, in the County of Queens, defendants **John Kinahan** and **Philip Buckles** agreed to open an account for a new bettor and to split that bettor.

2. On or about August 9, 2006, defendant **John Morrissey** agreed to open an betting account for a bettor under defendant **Andrew Lamparter.**

3. On or about August 3, 2006, defendants John Kinahan and

Salvatore Vaglica agreed to meet for **Salvatore Vaglica** to give **John Kinahan** gambling proceeds in the County of Queens.

4. On or about October 2, 2006, defendant **John Kinahan** agreed to close down a gambling account of a bettor for **Angelo Neos**, in the County of Queens.

5. On or about September 20, 2006, defendant **Philip Buckles** agreed to meet with defendant **Wai Kong** to exchange gambling proceeds for the organization in the County of Queens.

SECOND COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuses the defendants **John Kinahan (a.k.a. "JK")**, **Virginia Kinahan (a.k.a. "Ginger")**, **Philip Buckles**, **John Morrissey (a.k.a. "Bubba")**, **Stephen DeFranco**, **Jeremiah Keating**, **Angelo Neos**, **Timothy O'Connell**, **Craig Sullivan**, **Leo Stern**, **Peter Song**, **Andrew Lamparter**, **Glenn Mulhern**, **Salvatore Vaglica**, of the crime of **Promoting Gambling in the First Degree** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about July 11, 2006, in the County of Queens and elsewhere, 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 five thousand dollars.

THIRD COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment,

accuses the defendants **John Kinahan (a.k.a. "JK")**, **Virginia Kinahan (a.k.a. "Ginger")**, **Philip Buckles**, **John Morrissey (a.k.a. "Bubba")**, **Stephen DeFranco**, **Jeremiah Keating**, **Glenn Mulhern**, **Saavas Karamatzanis**, **Salvatore Vaglica**, of the crime of **Promoting Gambling in the First Degree** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about July 12, 2006, in the County of Queens and elsewhere, 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 five thousand dollars.

FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuses the defendants **John Kinahan (a.k.a. "JK")**, **Virginia Kinahan (a.k.a. "Ginger")**, **Philip Buckles**, **John Morrissey (a.k.a. "Bubba")**, **Stephen DeFranco**, **Jeremiah Keating**, **Angelo Neos**, **Timothy O'Connell**, **Craig Sullivan**, **Wai Kong**, **Andrew Lamparter**, **Glenn Mulhern**, **Salvatore Vaglica**, **Donny LNU** of the crime of **Promoting Gambling in the First Degree** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about July 13, 2006, in the County of Queens and elsewhere, 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 five

thousand dollars.

FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuses the defendants **John Kinahan (a.k.a. "JK")**, **Virginia Kinahan (a.k.a. "Ginger")**, **Philip Buckles**, **John Morrissey (a.k.a. "Bubba")**, **Stephen DeFranco**, **Jeremiah Keating**, **Angelo Neos**, **Timothy O'Connell**, **Craig Sullivan**, **Leo Stern**, **Andrew Lamparter**, **Glenn Mulhern**, **Saavas Karamatzanis**, **Salvatore Vaglica**, **Donny LNU** of the crime of **Promoting Gambling in the First Degree** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about July 14, 2006, in the County of Queens and elsewhere, 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 five thousand dollars.

SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuses the defendants **John Kinahan (a.k.a. "JK")**, **Virginia Kinahan (a.k.a. "Ginger")**, **Philip Buckles**, **John Morrissey (a.k.a. "Bubba")**, **Stephen DeFranco**, **Jeremiah Keating**, **Angelo Neos**, **Timothy O'Connell**, **Craig Sullivan**, **Leo Stern**, **Andrew Lamparter**, **Glenn Mulhern**, **Saavas Karamatzanis**, **Salvatore Vaglica**, **Donny LNU** of the crime of **Promoting Gambling in the First Degree** committed as follows:

Defendants, each aiding the others and acting in concert with

other persons, on or about July 15, 2006, in the County of Queens and elsewhere, 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 five thousand dollars.

SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuses the defendants **John Kinahan (a.k.a. "JK")**, **Virginia Kinahan (a.k.a. "Ginger")**, **Philip Buckles**, **John Morrissey (a.k.a. "Bubba")**, **Stephen DeFranco**, **Jeremiah Keating**, **Angelo Neos**, **Timothy O'Connell**, **Craig Sullivan**, **Leo Stern**, **Andrew Lamparter**, **Glenn Mulhern**, **Saavas Karamatzanis**, **Salvatore Vaglica**, **Donny LNU** of the crime of **Promoting Gambling in the First Degree** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about July 16, 2006, in the County of Queens and elsewhere, 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 five thousand dollars.

EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuses the defendants **John Kinahan (a.k.a. "JK")**, **Virginia Kinahan (a.k.a. "Ginger")**, **Philip Buckles**, **John Morrissey (a.k.a. "Bubba")**, **Stephen DeFranco**, **Jeremiah Keating**, **Angelo Neos**, **Timothy O'Connell**,

Craig Sullivan, Leo Stern, Wai Kong, Peter Song, Andrew Lamparter, Glenn Mulhern, Saavas Karamatzanis, Salvatore Vaglica, Donny LNU of the crime of **Promoting Gambling in the First Degree** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about July 17, 2006, in the County of Queens and elsewhere, 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 five thousand dollars.

NINTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuses the defendants **John Kinahan (a.k.a. "JK"), Virginia Kinahan (a.k.a. "Ginger"), Philip Buckles, John Morrissey (a.k.a. "Bubba"), Stephen DeFranco, Angelo Neos, Leo Stern, Wai Kong, Peter Song, Andrew Lamparter, Glenn Mulhern, Saavas Karamatzanis, Donny LNU** of the crime of **Promoting Gambling in the First Degree** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about September 4, 2006, in the County of Queens and elsewhere, 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 five thousand dollars.

TENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment,

accuses the defendants **John Kinahan (a.k.a. "JK")**, **Virginia Kinahan (a.k.a. "Ginger")**, **Philip Buckles**, **John Morrissey (a.k.a. "Bubba")**, **Stephen DeFranco**, **Angelo Neos**, **Leo Stern**, **Wai Kong**, **Peter Song**, **Andrew Lamparter**, **Glenn Mulhern**, **Donny LNU** of the crime of **Promoting Gambling in the First Degree** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about September 5, 2006, in the County of Queens and elsewhere, 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 five thousand dollars.

ELEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuses the defendants **John Kinahan (a.k.a. "JK")**, **Virginia Kinahan (a.k.a. "Ginger")**, **Philip Buckles**, **John Morrissey (a.k.a. "Bubba")**, **Stephen DeFranco**, **Angelo Neos**, **Timothy O'Connell**, **Leo Stern**, **Wai Kong**, **Peter Song**, **Andrew Lamparter**, **Glenn Mulhern**, **Saavas Karamatzanis**, **Donny LNU** of the crime of **Promoting Gambling in the First Degree** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about September 6, 2006, in the County of Queens and elsewhere, 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 five thousand dollars.

TWELFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuses the defendants **John Kinahan (a.k.a. "JK")**, **Virginia Kinahan (a.k.a. "Ginger")**, **Philip Buckles**, **John Morrissey (a.k.a. "Bubba")**, **Stephen DeFranco**, **Angelo Neos**, **Timothy O'Connell**, **Craig Sullivan**, **Leo Stern**, **Wai Kong**, **Peter Song**, **Andrew Lamparter**, **Glenn Mulhern**, **Saavas Karamatzanis**, **Salvatore Vaglica**, **Donny LNU** of the crime of **Promoting Gambling in the First Degree** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about September 7, 2006, in the County of Queens and elsewhere, 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 five thousand dollars.

THIRTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuses the defendants **John Kinahan (a.k.a. "JK")**, **Virginia Kinahan (a.k.a. "Ginger")**, **Philip Buckles**, **John Morrissey (a.k.a. "Bubba")**, **Stephen DeFranco**, **Glenn Mulhern**, **Saavas Karamatzanis**, **Donny LNU** of the crime of **Promoting Gambling in the First Degree** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about September 8, 2006, in the County of Queens and elsewhere, 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 five thousand dollars.

FOURTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuses the defendants **John Kinahan (a.k.a. "JK")**, **Virginia Kinahan (a.k.a. "Ginger")**, **Philip Buckles**, **John Morrissey (a.k.a. "Bubba")**, **Stephen DeFranco**, **Angelo Neos**, **Timothy O'Connell**, **Craig Sullivan**, **Leo Stern**, **Wai Kong**, **Peter Song**, **Andrew Lamparter**, **Glenn Mulhern**, of the crime of **Promoting Gambling in the First Degree** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about September 9, 2006, in the County of Queens and elsewhere, 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 five thousand dollars.

FIFTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuses the defendants **John Kinahan (a.k.a. "JK")**, **Virginia Kinahan (a.k.a. "Ginger")**, **Philip Buckles**, **John Morrissey (a.k.a. "Bubba")**, **Stephen DeFranco**, **Angelo Neos**, **Timothy O'Connell**, **Craig Sullivan**, **Leo Stern**, **Wai Kong**, **Peter Song**, **Andrew Lamparter**, **Glenn Mulhern**, **Saavas Karamatzanis**, **Donny LNU** of the crime of **Promoting Gambling in the First Degree** committed as follows:

Defendants, each aiding the others and acting in concert with

other persons, on or about September 10, 2006, in the County of Queens and elsewhere, 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 five thousand dollars.

SIXTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this indictment, accuses the defendants **John Kinahan (a.k.a. "JK")**, **Virginia Kinahan (a.k.a. "Ginger")**, **Philip Buckles**, **John Morrissey (a.k.a. "Bubba")**, **Stephen DeFranco**, **Jeremiah Keating**, **Angelo Neos**, **Timothy O'Connell**, **Craig Sullivan**, **Leo Stern**, **Wai Kong**, **Peter Song**, **Andrew Lamparter**, **Glenn Mulhern**, **Saavas Karamatzanis**, **Salvatore Vaglica**, **Donny LNU** of the crime of **Conspiracy in the Fifth Degree** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about May 1, 2006, to on or about March 22, 2007, in the County of Queens and elsewhere, with intent that conduct constituting a felony be performed, to wit: Promoting Gambling in the First Degree, agreed with one or more persons to engage in or cause the performance of such conduct.

It was a purpose of this conspiracy to acquire money through the operation of an unlawful gambling enterprise involving the use of an Internet website, www.50ksports.com, where bets on future contingent events could be placed and the organization's gambling records could be accessed. At all times relevant to this indictment, defendant **John Kinahan** controlled entire gambling enterprise, which

accepted bets, solicited new bettors, and conducted financial transactions in many locations including Queens County, New York, and elsewhere.

As part of this conspiracy, and at various times relevant to this indictment, this organization collected, distributed, and transferred these illegal gambling proceeds via its agents/runners, super-agents, and bookmaker: **John Kinahan, Philip Buckles, John Morrissey, Stephen DeFranco, Jeremiah Keating, Angelo Neos, Timothy O'Connell, Craig Sullivan, Leo Stern, Wai Kong, Peter Song, Andrew Lamparter, Glenn Mulhern, Saavas Karamatzanis, Salvatore Vaglica, and Donny LNU**, and with the assistance of a bookkeeper: **Virginia Kinahan**.

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:

1. On or about May 9, 2006, in the County of Queens, defendants **John Kinahan** and **Philip Buckles** agreed to open an account for a new bettor and to split that bettor.

2. On or about August 9, 2006, defendant **John Morrissey** agreed to open an betting account for a bettor under defendant **Andrew Lamparter**.

3. On or about August 3, 2006, defendants **John Kinahan** and **Salvatore Vaglica** agreed to meet for Salvatore Vaglica to give **John Kinahan** gambling proceeds in the County of Queens.

4. On or about October 2, 2006, defendant **John Kinahan** agreed to close down a gambling account of a bettor for **Angelo Neos**, in the County of Queens.

5. On or about September 20, 2006, defendant **Philip Buckles** agreed to meet with defendant **Wai Kong** to exchange gambling proceeds for the organization in the County of Queens.

DISTRICT ATTORNEY