

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

DEFENDANT

INDICTMENT NO. 1454/2025

PL 155.42-2(A)	GRAND LARCENY IN THE FIRST DEGREE (1)	(QUIMIS,VICTOR) (ROY, DEEPA)
PL 155.42-2(A)	GRAND LARCENY IN THE FIRST DEGREE (2)	(QUIMIS,VICTOR) (ROY, DEEPA) (HUNTER STUDIOS & DEVELOPER CORP.)
PL 155.42-2(B)	GRAND LARCENY IN THE FIRST DEGREE (3)	(QUIMIS,VICTOR) (ROY, DEEPA)
PL 155.42-2(B)	GRAND LARCENY IN THE FIRST DEGREE (4)	(QUIMIS,VICTOR) (ROY, DEEPA) (HUNTER STUDIOS & DEVELOPER CORP.)

PL 187.20	RESIDENTIAL MORTGAGE FRAUD IN THE SECOND DEGREE (5)	(QUIMIS,VICTOR) (ROY,DEEPA) (HUNTER STUDIOS & DEVELOPER CORP.)
PL 470.15-1B-IIA	MONEY LAUNDERING IN THE SECOND DEGREE (6)	(QUIMIS,VICTOR) (HUNTER STUDIOS & DEVELOPER CORP.)
PL 170.25	CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE (7)	(QUIMIS,VICTOR) (ROY,DEEPA)
PL 170.25	CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE (8)	(QUIMIS,VICTOR) (ROY,DEEPA) (HUNTER STUDIOS & DEVELOPER CORP.)
PL 175.35-1	OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE (9)	(QUIMIS,VICTOR) (ROY,DEEPA)
PL 175.35-1	OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE (10)	(QUIMIS,VICTOR) (ROY,DEEPA) (HUNTER STUDIOS & DEVELOPER CORP.)
PL 190.65-1B	SCHEME TO DEFRAUD IN THE FIRST DEGREE (11)	(QUIMIS,VICTOR) (ROY,DEEPA) (HUNTER STUDIOS & DEVELOPER CORP.)

ATTORNEY GENERAL

FIRST COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS VICTOR QUIMIS AND DEEPA ROY OF GRAND LARCENY IN
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT OCTOBER 13,
2024 IN THE COUNTY OF QUEENS, COMMITTED DEED THEFT, REGARDLESS OF THE
VALUE, OF A RESIDENTIAL REAL PROPERTY, TO WIT, 153-34 78TH ROAD,
FLUSHING, NEW YORK, 11367 , THAT WAS OCCUPIED AS A HOME BY AT LEAST
ONE PERSON.

SECOND COUNT

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

THE DEFENDANTS, EACH AIDING THE OTHERS, ON OR ABOUT DECEMBER
27, 2024 IN THE COUNTY OF QUEENS, COMMITTED DEED THEFT, REGARDLESS OF
THE VALUE, OF A RESIDENTIAL REAL PROPERTY, TO WIT, 153-34 78TH ROAD,
FLUSHING, NEW YORK, 11367 , THAT WAS OCCUPIED AS A HOME BY AT LEAST
ONE PERSON.

THIRD COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS VICTOR QUIMIS AND DEEPA ROY OF GRAND LARCENY IN
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT OCTOBER 24,
2024 IN THE COUNTY OF QUEENS, COMMITTED DEED THEFT, REGARDLESS OF THE
VALUE, OF A RESIDENTIAL REAL PROPERTY, TO WIT, 153-34 78TH ROAD,
FLUSHING, NEW YORK, 11367 , THAT INVOLVED A HOME THAT WAS OWNED BY AN
ELDERLY PERSON, AN INCOMPETENT, AN INCAPACITATED PERSON, OR PHYSICALLY
DISABLED PERSON.

FOURTH COUNT

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

THE DEFENDANTS, EACH AIDING THE OTHERS, ON OR ABOUT DECEMBER
27, 2024 IN THE COUNTY OF QUEENS, COMMITTED DEED THEFT, REGARDLESS OF
THE VALUE, OF A RESIDENTIAL REAL PROPERTY, TO WIT, 153-34 78TH ROAD,
FLUSHING, NEW YORK, 11367 , THAT INVOLVED A HOME THAT WAS OWNED BY AN
ELDERLY PERSON, AN INCOMPETENT, AN INCAPACITATED PERSON, OR PHYSICALLY
DISABLED PERSON.

FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF RESIDENTIAL MORTGAGE FRAUD IN THE SECOND
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS, ON OR ABOUT AND BETWEEN
NOVEMBER 18, 2024 AND MARCH 12, 2025 IN THE COUNTY OF QUEENS,
KNOWINGLY AND WITH INTENT TO DEFRAUD, PRESENTED, CAUSED TO BE PRESENTED,
OR PREPARED WITH KNOWLEDGE OR BELIEF THAT IT WOULD BE USED IN SOLICITING
AN APPLICANT FOR, APPLYING FOR, UNDERWRITING OR CLOSING A RESIDENTIAL
MORTGAGE LOAN, OR FILING WITH A COUNTY CLERK OF ANY COUNTY IN THE
STATE ARISING OUT OF AND RELATED TO THE CLOSING OF A RESIDENTIAL
MORTGAGE LOAN, ANY WRITTEN STATEMENT WHICH CONTAINED MATERIALLY FALSE
INFORMATION CONCERNING ANY FACT MATERIAL THERETO, OR CONCEALED, FOR
THE PURPOSES OF MISLEADING, INFORMATION CONCERNING ANY FACT MATERIAL
THERETO, AND THEREBY RECEIVED PROCEEDS OR ANY OTHER FUNDS IN THE
AGGREGATE IN EXCESS OF FIFTY THOUSAND DOLLARS.

SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS VICTOR QUIMIS AND HUNTER STUDIOS & DEVELOPER
CORP. OF MONEY LAUNDERING IN THE SECOND DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT AND BETWEEN
MARCH 12, 2025 AND MAY 21, 2025 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, WHICH IN
FACT INVOLVED THE PROCEEDS OF SPECIFIED 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 SPECIFIED CRIMINAL
CONDUCT; AND THE TOTAL VALUE OF THE PROPERTY INVOLVED IN SUCH
FINANCIAL TRANSACTION OR TRANSACTIONS EXCEEDED ONE HUNDRED THOUSAND
DOLLARS.

SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS VICTOR QUIMIS AND DEEPA ROY OF CRIMINAL
POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE COMMITTED AS
FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT AND BETWEEN
OCTOBER 13, 2024 AND APRIL 30, 2025 IN THE COUNTY OF QUEENS, WITH
KNOWLEDGE THAT IT WAS FORGED AND WITH INTENT TO DEFRAUD, DECEIVE OR
INJURE ANOTHER, UTTERED OR POSSESSED A FORGED INSTRUMENT WHICH WAS OR
PURPORTED TO BE, OR WHICH WAS CALCULATED TO BECOME OR TO REPRESENT IF
COMPLETED A DEED

EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF CRIMINAL POSSESSION OF A FORGED INSTRUMENT
IN THE SECOND DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS, ON OR ABOUT DECEMBER
27, 2024 IN THE COUNTY OF QUEENS, WITH KNOWLEDGE THAT IT WAS FORGED
AND WITH INTENT TO DEFRAUD, DECEIVE OR INJURE ANOTHER, UTTERED OR
POSSESSED A FORGED INSTRUMENT WHICH WAS OR PURPORTED TO BE, OR WHICH WAS
CALCULATED TO BECOME OR TO REPRESENT IF COMPLETED A DEED

NINTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS VICTOR QUIMIS AND DEEPA ROY OF OFFERING A FALSE
INSTRUMENT FOR FILING IN THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHER, ON OR ABOUT NOVEMBER 07,
2024 IN THE COUNTY OF QUEENS, KNOWING THAT A WRITTEN INSTRUMENT
CONTAINED A FALSE STATEMENT OR FALSE INFORMATION, AND WITH INTENT TO
DEFRAUD THE STATE OR ANY POLITICAL SUBDIVISION, PUBLIC AUTHORITY OR
PUBLIC BENEFIT CORPORATION OF THE STATE, THEY OFFERED OR PRESENTED THE
SAME TO A PUBLIC OFFICE, PUBLIC SERVANT, PUBLIC AUTHORITY OR PUBLIC
BENEFIT CORPORATION KNOWING OR BELIEVING THAT IT WOULD BE FILED WITH,
REGISTERED OR RECORDED IN, OR OTHERWISE BECOME A PART OF THE RECORDS OF
SUCH PUBLIC OFFICE, PUBLIC SERVANT, PUBLIC AUTHORITY OR PUBLIC BENEFIT
CORPORATION.

TENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF OFFERING A FALSE INSTRUMENT FOR FILING IN
THE FIRST DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS, ON OR ABOUT APRIL 11,
2025 IN THE COUNTY OF QUEENS, KNOWING THAT A WRITTEN INSTRUMENT
CONTAINED A FALSE STATEMENT OR FALSE INFORMATION, AND WITH INTENT TO
DEFRAUD THE STATE OR ANY POLITICAL SUBDIVISION, PUBLIC AUTHORITY OR
PUBLIC BENEFIT CORPORATION OF THE STATE, THEY OFFERED OR PRESENTED THE
SAME TO A PUBLIC OFFICE, PUBLIC SERVANT, PUBLIC AUTHORITY OR PUBLIC
BENEFIT CORPORATION KNOWING OR BELIEVING THAT IT WOULD BE FILED WITH,
REGISTERED OR RECORDED IN, OR OTHERWISE BECOME A PART OF THE RECORDS OF
SUCH PUBLIC OFFICE, PUBLIC SERVANT, PUBLIC AUTHORITY OR PUBLIC BENEFIT
CORPORATION.

ELEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANTS OF SCHEME TO DEFRAUD IN THE FIRST DEGREE
COMMITTED AS FOLLOWS:

THE DEFENDANTS, EACH AIDING THE OTHERS, ON OR ABOUT AND BETWEEN
SEPTEMBER 03, 2024 AND JULY 17, 2025 IN THE COUNTY OF QUEENS, ENGAGED
IN A SCHEME CONSTITUTING A SYSTEMATIC ONGOING COURSE OF CONDUCT, WITH
INTENT TO DEFRAUD MORE THAN ONE PERSON OR TO OBTAIN PROPERTY FROM MORE
THAN ONE PERSON BY FALSE OR FRAUDULENT PRETENSES, REPRESENTATIONS OR
PROMISES, AND SO OBTAINED PROPERTY WITH A VALUE IN EXCESS OF ONE
THOUSAND DOLLARS FROM ONE OR MORE PERSONS.

AAG Lauren Sass on behalf of
LETITIA JAMES NYS Attorney General
ATTORNEY GENERAL Letitia James