

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

FILED
2014 JUN 24 P 2:28
LEONARD H. WICKING
CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

v.

CR 14 336

ERIC OMURO,
a/k/a Steve Bucher,
a/k/a Craig Armstrong,
a/k/a Ed Cook,
a/k/a "Red," and
ANNMARIE LANOCE,
a/k/a Madison Monroe,
a/k/a "Maddie,"

WHO

UNDERSEAL

DEFENDANT(S).

INDICTMENT

18 U.S.C. § 1952(a)(3)(A) and (b)(i)(1) - Interstate and Foreign Travel in Aid of Racketeering Enterprise;
18 U.S.C. § 1957(a) - Money Laundering;
18 U.S.C. § 2 - Aiding and Abetting;
18 U.S.C. §§ 981(a)(1)(C), 982(a)(1), and
28 U.S.C. § 2461(c) - Forfeiture Allegations

A true bill.

[Signature]

Foreman

Filed in open court this 24th day of

June 2014

[Signature]

Clerk

Bail, \$ no bail/arrest warrants as to both defendants

[Signature]

Nathanael Cousins
United States Magistrate Judge

1 MELINDA HAAG (CABN 132612)
United States Attorney

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NORTHERN DISTRICT OF CALIFORNIA

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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

WHO

11
12 UNITED STATES OF AMERICA,

CR 14 336

13 Plaintiff,

VIOLATIONS:

14 v.

18 U.S.C. § 1952(a)(3)(A) and (b)(i)(1) - Interstate
and Foreign Travel in Aid of Racketeering Enterprise;
18 U.S.C. § 1957(a) - Money Laundering;
18 U.S.C. § 2 - Aiding and Abetting;
18 U.S.C. §§ 981(a)(1)(C), 982(a)(1), and 28 U.S.C. §
2461(c) - Forfeiture Allegations

15 ERIC OMURO,
a/k/a Steve Bucher,
16 a/k/a Craig Armstrong,
a/k/a Ed Cook,
17 a/k/a "Red," and
ANNMARIE LANOCE,
18 a/k/a Madison Monroe,
a/k/a "Maddie,"

SAN FRANCISCO VENUE

19 Defendants.
20
21

22 INDICTMENT

23 The Grand Jury charges:

24 COUNT ONE: (18 U.S.C. § 1952(a)(3)(A) and (b)(i)(1) – Interstate and Foreign Travel in Aid of
25 Racketeering Enterprise; 18 U.S.C. § 2 – Aiding and Abetting)

26 1. From on or about April 1, 2010, to the present, in the Northern District of California and
27 elsewhere, defendants,
28

1 ERIC OMURO,
2 a/k/a Steve Bucher,
3 a/k/a Craig Armstrong,
4 a/k/a Ed Cook,
5 a/k/a "Red," and
6 ANNMARIE LANOCE,
7 a/k/a Madison Monroe,
8 a/k/a "Maddie,"

9 knowingly used the mail and a communication facility in interstate and foreign commerce, such
10 as the Internet, with the intent to promote, manage, establish, carry on, and facilitate the
11 promotion, management, establishment, and carrying on of an unlawful activity, to wit:
12 prostitution offenses in violation of the laws of the State in which they are committed, including
13 California Penal Code Section 647(b), and thereafter performed an act that did promote, manage,
14 establish, carry on, and facilitate the promotion, management, establishment, and carrying on of
15 the unlawful activity, in violation of Title 18, United States Code, Sections 2 and 1952(a)(3)(A)
16 and (b)(i)(1).

17 COUNTS TWO THROUGH TWENTY-FIVE: (18 U.S.C. § 1957(a) – Money Laundering)

18 2. On or about the dates set forth below, in the Northern District of California and
19 elsewhere, defendant,

20 ERIC OMURO,
21 a/k/a Steve Bucher,
22 a/k/a Craig Armstrong,
23 a/k/a Ed Cook,
24 a/k/a "Red,"

25 knowingly engaged in the following monetary transactions, in and affecting interstate and
26 foreign commerce, in criminally derived property of a value greater than \$10,000, that was
27 derived from specified unlawful activity, namely racketeering in support of prostitution offenses
28 in violation of Title 18, United States Code, Section 1952(a)(3)(A) and (b)(1).

<i>COUNT</i>	<i>DATE</i>	<i>MONETARY TRANSACTION</i>
TWO	6/22/2010	Transfer from Bank of America (BoA) account ending -1953 to JP Morgan Chase (Chase) account ending -6555 in the amount of \$275,000.
THREE	9/15/2010	Transfer from BoA account ending -1953 to Addison Avenue FCU (AAFCU) account ending -

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<i>COUNT</i>	<i>DATE</i>	<i>MONETARY TRANSACTION</i>
		4904 in the amount of \$95,000.
FOUR	11/9/2010	Transfer from BoA account ending -1953 to AAFCU account ending -4904 in the amount of \$95,000.
FIVE	11/30/2010	Transfer from BoA account ending -1953 to AAFCU account ending -4904 in the amount of \$97,000.
SIX	2/7/2011	Transfer from BoA account ending -5921 to First Technology Federal Credit Union (FTFCU) account ending -4904 in the amount of \$98,000.
SEVEN	4/19/2011	Transfer from BoA account ending -1953 to FTFCU account ending -4904 in the amount of \$98,000.
EIGHT	6/21/2011	Transfer from BoA account ending -1953 to FTFCU account ending -4904 in the amount of \$98,000.
NINE	9/26/2011	Transfer from BoA account ending -5921 to Ally Bank ending -7329 in the amount of \$90,000.
TEN	10/17/2011	Transfer from BoA account ending -1953 to FTFCU account ending -4904 in the amount of \$90,000.
ELEVEN	4/13/2012	Transfer from BoA account ending -1953 to Ally Bank account ending -7329 in the amount of \$90,000.
TWELVE	6/21/2012	Transfer from BoA account ending -5921 to Ally Bank account ending -7329 in the amount of \$95,000.
THIRTEEN	9/27/2012	Transfer from BoA account ending -1953 to Ally Bank account ending -7329 in the amount of \$95,000.
FOURTEEN	10/23/2012	Transfer from BoA account ending -1953 to Chase account ending -7950 in the amount of \$100,000.
FIFTEEN	1/16/2013	Transfer from BoA account ending -1953 to Ally Bank account ending -7329 in the amount of \$99,000.
SIXTEEN	4/14/2013	Transfer from BoA account ending -5921 to Chase account ending -7950 in the amount of \$100,000.
SEVENTEEN	4/19/2013	Transfer from BoA account ending -1953 to Ally Bank account ending -7329 in the amount of \$99,500.
EIGHTEEN	5/31/2013	Transfer from BoA account ending -5921 to FTFCU account ending -4904 in the amount of \$90,000.

<i>COUNT</i>	<i>DATE</i>	<i>MONETARY TRANSACTION</i>
NINETEEN	5/31/2013	Transfer from BoA account ending -5921 to Ally Bank account ending -7329 in the amount of \$98,800.
TWENTY	7/11/2013	Transfer from BoA account ending -5921 to Ally Bank account ending -7329 in the amount of \$99,000.
TWENTY-ONE	8/1/2013	Transfer from BoA account ending -1953 to FTFCU account ending -4904 in the amount of \$95,000.
TWENTY-TWO	9/19/2013	Transfer from BoA account ending -5921 to Ally Bank account ending -7329 in the amount of \$99,000.
TWENTY-THREE	12/6/2013	Transfer from BoA account ending -5921 to Ally Bank account ending -7329 in the amount of \$98,000.
TWENTY-FOUR	12/6/2013	Transfer from BoA account ending -5921 to FTFCU account ending -4904 in the amount of \$96,000
TWENTY-FIVE	1/17/2014	Transfer from BoA account ending -1953 to Ally Bank account ending -7329 in the amount of \$97,000.

All in violation of Title 18, United States Code, Section 1957(a).

FIRST FORFEITURE ALLEGATION: (18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Forfeiture of Racketeering Proceeds)

3. All of the allegations contained in paragraph one are realleged and incorporated as though fully set forth for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

4. Upon conviction for the offense charged in Count One above, defendants,

ERIC OMURO,
a/k/a Steve Bucher,
a/k/a Craig Armstrong,
a/k/a Ed Cook,
a/k/a "Red," and
ANNMARIE LANOCE,
a/k/a Madison Monroe,
a/k/a "Maddie,"

1 shall forfeit to the United States any property, real or personal, which constitutes or is derived from
2 proceeds traceable to violations of Title 18, United States Code, Section 1952, up to at least
3 approximately \$5,419,791, including but not limited to the following:

- 4 a. 2011 BMW, California License Plate 6TOG563, VIN WBSPM9C55B698912, with the
5 registered owner listed as Eric Omuro;
- 6 b. 2012 Mini Cooper, California License Plate 6WWZ806, VIN WMWZC352CWL84479 with
7 the registered owner listed as Nadja Villegas;
- 8 c. Funds not to exceed \$518,833.96 in Bank of America, N.A., business money market account
9 #05208-01953 held in the name of Armstrong Computer Services, Inc.;
- 10 d. Funds not to exceed \$501,376.45 in Bank of America, N.A., business advantage checking
11 account #01445-25921 held in the name of Armstrong Computer Services, Inc.;
- 12 e. Funds not to exceed \$33,935.38 in First Tech Federal Credit Union carefree checking
13 account #273664904 held in the name of Eric Omuro;
- 14 f. Funds not to exceed \$15,232.66 in First Tech Federal Credit Union carefree savings account
15 #27366480 held in the name of Eric Omuro;
- 16 g. Funds not to exceed \$82,956.41 in Ally Bank online savings account #2113417329 held in
17 the name of Eric Omuro;
- 18 h. Funds not to exceed \$17,101.33 contained in Ally Bank online savings account #2114192780
19 held in the names of Eric Omuro and Kerilyn Omuro;
- 20 i. Funds not to exceed \$77,642.16 in Ally Bank online savings account #1023724931 held in
21 the name of Eric Omuro;
- 22 j. Funds not to exceed \$25,418.52 in JP Morgan Chase account #3151506555 held in the name
23 of Eric Omuro;
- 24 k. Funds not to exceed \$100,000 in JP Morgan Chase account #2900278010 held in the name of
25 Armstrong Computer Services, Inc.;
- 26 l. Funds not to exceed \$66,305.73 in JP Morgan Chase account #100727950 held in the name
27 of Armstrong Computer Services, Inc.; and
- 28 m. Funds not to exceed \$99,790.55 exclusive of penalties and interest in the IRA E-Trade
account #65491813 held in the name of Eric Omuro;

5. If any of the aforementioned property, as a result of any act or omission of the defendant:
- a. Cannot be located upon the exercise of due diligence;
 - b. Has been transferred or sold to, or deposited with a third person;
 - c. Has been placed beyond the jurisdiction of the Court;

1 d. Has been substantially diminished in value; or

2 e. Has been commingled with other property that cannot be divided without difficulty,

3 any and all interest defendants have in other property shall be vested in the United States and forfeited to
4 the United States pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18,
5 United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

6 SECOND FORFEITURE ALLEGATION: (18 U.S.C. § 982(a)(1) – Property Involved in Money
7 Laundering)

8 6. All of the allegations contained in paragraph two are realleged and incorporated as though fully
9 set forth for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code,
10 Section 982(a)(1).

11 7. Upon conviction for the offenses charged in Counts Two through Count Twenty Five above,
12 defendant,

13 ERIC OMURO,
14 a/k/a Steve Bucher,
15 a/k/a Craig Armstrong,
16 a/k/a Ed Cook,
17 a/k/a "Red,"

18 shall forfeit to the United States any property, real or personal, involved in a violation of Title 18,
19 United States Code, Section 1957, or any property traceable to such offense, up to at least approximately
20 \$5,419,791, constituting money involved in the money laundering, including but not limited to the
21 following:

- 22 a. 2011 BMW, California License Plate 6TOG563, VIN WBSPM9C55B698912, with the
23 Registered Owner listed as Eric Omuro;
- 24 b. 2012 Mini Cooper, California License Plate 6WWZ806, VIN WMWZC352CWL84479 with
25 the registered owner listed as Nadja Villegas;
- 26 c. Funds not to exceed \$518,833.96 in Bank of America, N.A., business money market account
27 #05208-01953 held in the name of Armstrong Computer Services, Inc.;
- 28 d. Funds not to exceed \$501,376.45 in Bank of America, N.A., business advantage checking
account #01445-25921 held in the name of Armstrong Computer Services, Inc.;
- e. Funds not to exceed \$33,935.38 in First Tech Federal Credit Union carefree checking
account #273664904 held in the name of Eric Omuro;

- f. Funds not to exceed \$15,232.66 in First Tech Federal Credit Union carefree savings account #27366480 held in the name of Eric Omuro;
 - g. Funds not to exceed \$82,956.41 in Ally Bank online savings account #2113417329 held in the name of Eric Omuro;
 - h. Funds not to exceed \$17,101.33 contained in Ally Bank online savings account #2114192780 held in the names of Eric Omuro and Kerilyn Omuro;
 - i. Funds not to exceed \$77,642.16 in Ally Bank online savings account #1023724931 held in the name of Eric Omuro;
 - j. Funds not to exceed \$25,418.52 in JP Morgan Chase account #3151506555 held in the name of Eric Omuro;
 - k. Funds not to exceed \$100,000 in JP Morgan Chase account #2900278010 held in the name of Armstrong Computer Services, Inc.;
 - l. Funds not to exceed \$66,305.73 in JP Morgan Chase account #100727950 held in the name of Armstrong Computer Services, Inc.;
 - m. Funds not to exceed \$99,790.55 exclusive of penalties and interest in the IRA E-Trade account #65491813 held in the name of Eric Omuro;
 - n. The domain name sfredbook.com, an Internet website; and
 - o. The domain name myredbook.com, an Internet website.
8. If any of the aforementioned property, as a result of any act or omission of the defendant:
- a. Cannot be located upon the exercise of due diligence;
 - b. Has been transferred or sold to, or deposited with a third person;
 - 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 that cannot be divided without difficulty,

any and all interest defendants have in other property shall be vested in the United States and forfeited to the United States pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18,

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1 United States Code, Section 982(b)(1).


2 DATED:

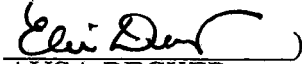
A TRUE BILL.

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4 6/24/14


FOREPERSON

5
6 MELINDA HAAG
United States Attorney

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8 
J. DOUGLAS WILSON
9 Chief, Criminal Division

10 (Approved as to form: )
11 AUSA BECKER

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