

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

UNITED STATES OF AMERICA,

v.

CR 14 336

ERIC OMURO,
a/k/a Steve Bucher,
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

DEFENDANT(S).

INDICTMENT

18 U.S.C. § 1952(a)(3)(A) and (b)(i)(1) - Interstate and Foreign Travel in Aid of
Racketeering Enterprise;

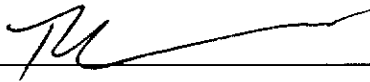
18 U.S.C. § 1957(a) - Money Laundering;

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

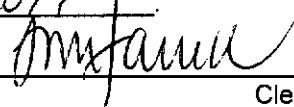
A true bill.



Foreman

Filed in open court this 24th day of

June 2014



Clerk

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



Nathanael Cousins

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED
 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

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony
PENALTY:

Please see attachment.

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

DEFENDANT - U.S.

ERIC OMURO

DISTRICT COURT NUMBER

CR 14 336**DEFENDANT****IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

1) ☒ If not detained give date any prior summons was served on above charges2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**4) ☐ On this charge5) ☐ On another conviction☐ Federal ☐ State6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Federal Bureau of Investigation

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. ATTORNEY ☐ DEFENSE

SHOW DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form Melinda Haag

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned)

Elise Becker

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address: _____

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments: _____

ATTACHMENT: MAXIMUM STATUTORY PENALTIES

DEFENDANT: ERIC OMURO, a/k/a Steve Bucher, a/k/a Craig Armstrong, a/k/a Ed Cook, a/k/a "Red"

PENALTY: Maximum Prison Term: 5 Years (Racketeering) and 10 years (Money Laundering);
Maximum Fine of \$250,000 or twice the amount of criminally derived property;
Maximum Term of Supervised Release of 3 years;
Mandatory Special Assessment of \$100 per count.

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED
 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. § 2 - Aiding and Abetting;
 18 U.S.C. §§ 981(a)(1)(C) and
 28 U.S.C. § 2461(c) - Forfeiture Allegations

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

 PENALTY: Maximum Prison Term of 5 Years;
 Maximum Fine of \$250,000;
 Maximum Term of Supervised Release of 3 years;
 Mandatory Special Assessment of \$100.

Name of District Court, and of Judge/Magistrate Location

 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

DEFENDANT - U.S.

ANNMARIE LANOCE

DISTRICT COURT NUMBER

CR 14 336

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

- 1)
- ☒
- If not detained give date any prior
-
- summons was served on above charges
-
- 2)
- ☐
- Is a Fugitive
-
- 3)
- ☐
- Is on Bail or Release from (show District)

IS IN CUSTODY

- 4)
- ☐
- On this charge
-
- 5)
- ☐
- On another conviction }
- ☐
- Federal
- ☐
- State
-
- 6)
- ☐
- Awaiting trial on other charges
-
- If answer to (6) is "Yes", show name of institution

 Has detainer ☐ Yes
 been filed? ☐ No

 If "Yes"
 give date
 filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

Federal Bureau of Investigation

☐ person is awaiting trial in another Federal or State Court,
 give name of court

☐ this person/proceeding is transferred from another district
 per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of
 charges previously dismissed
 which were dismissed on motion
 of:

☐ U.S. ATTORNEY ☐ DEFENSE
SHOW
DOCKET NO.
☐ this prosecution relates to a
 pending case involving this same
 defendant
MAGISTRATE
CASE NO.
☐ prior proceedings or appearance(s)
 before U.S. Magistrate regarding this
 defendant were recorded under

Name and Office of Person

Furnishing Information on this form Melinda Haag

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

Elise Becker

ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

 * Where defendant previously apprehended on complaint, no new summons or
 warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

1 MELINDA HAAG (CABN 132612)
2 United States Attorney

FILED
2014 JUN 24 P 2:28
U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

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

11
12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

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

23 Defendants.

CR 14 336

VIOLATIONS:

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

SAN FRANCISCO VENUE

24 INDICTMENT

25 The Grand Jury charges:

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

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

INDICTMENT

18

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,"

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

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

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

ERIC OMURO,
a/k/a Steve Bucher,
a/k/a Craig Armstrong,
a/k/a Ed Cook,
a/k/a "Red,"

knowingly engaged in the following monetary transactions, in and affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, that was derived from specified unlawful activity, namely racketeering in support of prostitution offenses 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 -

COUNT	DATE	MONETARY TRANSACTION
		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.

COUNT	DATE	MONETARY TRANSACTION
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;

- 1 f. Funds not to exceed \$15,232.66 in First Tech Federal Credit Union carefree savings account
2 #27366480 held in the name of Eric Omuro;
- 3 g. Funds not to exceed \$82,956.41 in Ally Bank online savings account #2113417329 held in
4 the name of Eric Omuro;
- 5 h. Funds not to exceed \$17,101.33 contained in Ally Bank online savings account #2114192780
6 held in the names of Eric Omuro and Kerilyn Omuro;
- 7 i. Funds not to exceed \$77,642.16 in Ally Bank online savings account #1023724931 held in
8 the name of Eric Omuro;
- 9 j. Funds not to exceed \$25,418.52 in JP Morgan Chase account #3151506555 held in the name
10 of Eric Omuro;
- 11 k. Funds not to exceed \$100,000 in JP Morgan Chase account #2900278010 held in the name of
12 Armstrong Computer Services, Inc.;
- 13 l. Funds not to exceed \$66,305.73 in JP Morgan Chase account #100727950 held in the name
14 of Armstrong Computer Services, Inc.;
- 15 m. Funds not to exceed \$99,790.55 exclusive of penalties and interest in the IRA E-Trade
16 account #65491813 held in the name of Eric Omuro;
- 17 n. The domain name sfredbook.com, an Internet website; and
- 18 o. The domain name myredbook.com, an Internet website.
- 19 8. If any of the aforementioned property, as a result of any act or omission of the defendant:
- 20 a. Cannot be located upon the exercise of due diligence;
- 21 b. Has been transferred or sold to, or deposited with a third person;
- 22 c. Has been placed beyond the jurisdiction of the Court;
- 23 d. Has been substantially diminished in value; or
- 24 e. Has been commingled with other property that cannot be divided without difficulty,

25 any and all interest defendants have in other property shall be vested in the United States and forfeited to
26 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:

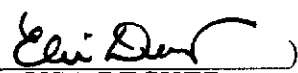
A TRUE BILL.

3
4 6/24/14

5
6 
FOREPERSON

7 MELINDA HAAG
United States Attorney

8 
J. DOUGLAS WILSON
Chief, Criminal Division

9
10 (Approved as to form: 
AUSA BECKER

United States District Court
Northern District of California

CRIMINAL COVER SHEET

Instructions: Effective January 3, 2012, this Criminal Cover Sheet must be completed and submitted, along with the Defendant Information Form, for each new criminal case. Please place this form on top of the Defendant Information Form.

Case Name:

USA v. ERIC OMURO and ANNMARIE LANOCE

CR

Case Number:

14

336

Total Number of Defendants:

1

2-7



8 or more

Is This Case Under Seal?

Yes



No

WHO

Does this case involve ONLY charges under 8 U.S.C. § 1325 and/or 1326?

Yes

No



Venue (Per Crim. L.R. 18-1):

SF



OAK

SJ

Is this a death-penalty-eligible RICO Act gang case?

Yes

No



Assigned AUSA (Lead Attorney):

Elise Becker

Comments:

Date Submitted:

06/24/2014