

# United States District Court

FOR THE  
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

FILED  
2014 JUN 24 P 2:28

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

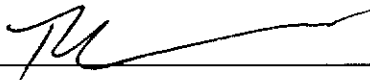
**CONFIDENTIAL**

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

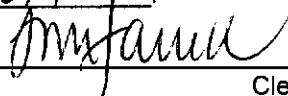
A true bill.



Foreman

Filed in open court this 24<sup>th</sup> day of

June 2014



Clerk

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



Nathanael Cousins  
United States Magistrate Judge

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**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**

BY:  COMPLAINT  INFORMATION  INDICTMENT  SUPERSEDING

Name of District Court, and/or Judge/Magistrate Location  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

**OFFENSE CHARGED**

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

PENALTY: Please see attachment.

**DEFENDANT - U.S.**

ERIC OMURO

DISTRICT COURT NUMBER

**CR 14 336**

**DEFENDANT**

**IS NOT IN CUSTODY**

- 1)  Has not been arrested, pending outcome this proceeding. 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 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

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

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

Defendant Address: \_\_\_\_\_

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

Name of District Court, and of Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

OFFENSE CHARGED

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

DEFENDANT - U.S.

ANNMARIE LANOCE

DISTRICT COURT NUMBER

CR 14 336

DEFENDANT

WHO

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

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 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

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

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

Defendant Address:

Date/Time: \_\_\_\_\_ Before Judge: \_\_\_\_\_

Comments:

FILED  
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U.S. DISTRICT COURT  
SAN FRANCISCO, CALIFORNIA

1 MELINDA HAAG (CABN 132612)  
United States Attorney

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WHO

**CR 14 336**

UNITED STATES OF AMERICA,  
Plaintiff,

v.

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,"  
Defendants.

**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

INDICTMENT

The Grand Jury charges:

COUNT ONE: (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)

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

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,"

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

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

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

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

17 knowingly engaged in the following monetary transactions, in and affecting interstate and  
 18 foreign commerce, in criminally derived property of a value greater than \$10,000, that was  
 19 derived from specified unlawful activity, namely racketeering in support of prostitution offenses  
 20 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 -

<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;

- 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,

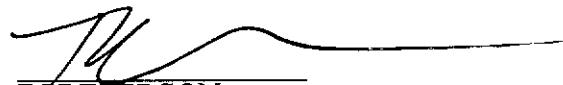
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1 United States Code, Section 982(b)(1).

2 DATED:

A TRUE BILL.

3  
4 *6/24/14*

  
FOREPERSON

5  
6 MELINDA HAAG  
United States Attorney

7  
8 *J. Douglas Wilson*  
J. DOUGLAS WILSON  
Chief, Criminal Division

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10 (Approved as to form: *Eli Becker*)  
AUSA BECKER

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United States District Court  
Northern District of California

~~UNRECORDED~~  
~~CRIMINAL~~

FILED  
2014 JUN 24 P 2:28

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

PRINT