
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA

V.

DAVID ARYEH EPSTEIN and
CHAIM BARUCH RUBIN

: Hon. Douglas E. Arpert

:
: Mag. No. 14-2514 (DEA)

:
: **COMPLAINT**
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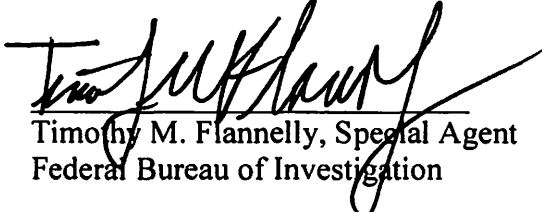
I, Timothy M. Flannelly, being duly sworn state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation and that this Complaint is based on the following facts:

SEE ATTACHMENT B

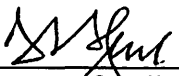
continued on the attached sheet(s) and made a part hereof.



Timothy M. Flannelly, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
May 14, 2014 at Trenton, New Jersey

HONORABLE DOUGLAS E. ARPert
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

In or about November 2009, in Ocean County, in the District of New Jersey and elsewhere, defendants

DAVID ARYEH EPSTEIN and
CHAIM BARUCH RUBIN

did knowingly and unlawfully seize, confine, inveigle, decoy, kidnap, abduct, and hold a person, "Victim 1," for ransom, reward and otherwise, that is, to threaten and coerce him to consent to a Jewish divorce, and, in committing or in furtherance of the commission of the offense, did cause Victim 1 to be willfully transported in interstate commerce from New York to New Jersey and did use any means, facility, and instrumentality of interstate and foreign commerce.

In violation of Title 18, United States Code, Section 1201(a) and Title 18, United States Code, Section 2.

ATTACHMENT B

I, Timothy M. Flannelly, Special Agent with the Federal Bureau of Investigation (“FBI”), have knowledge of the following facts based on my own investigation and upon conversations with other individuals involved in this investigation. I have not included all of the facts known to me in this affidavit, just those facts which I believe are necessary to establish probable cause. Where statements of others are set forth in this Affidavit, they are set forth in substance and in part:

1. At all times relevant to this Complaint, defendant David Aryeh Epstein (“EPSTEIN”) resides in Lakewood, New Jersey.
2. At all times relevant to this Complaint, defendant Chaim Baruch Rubin (“RUBIN”) resides in Lakewood, New Jersey.
3. In 2009, Victim 1 and his then-wife were engaged in a contested divorce. During the summer of 2009, Victim 1 and his then-wife separated and he moved out of the family home to another residence in Brooklyn, New York.
4. In November 2009, Victim 1 received an unsolicited phone call from RUBIN concerning a sales job opportunity at RUBIN’s company, “ShredZone,” in Lakewood, New Jersey. After an interview, RUBIN offered the job to Victim 1. Victim 1 accepted the job offer and moved to a temporary residence in Lakewood, New Jersey, to begin working for RUBIN.
5. A few days after Victim 1 began working for RUBIN, RUBIN asked Victim 1 to stay late at the office in Lakewood for a private meeting. Victim 1 agreed and waited for RUBIN to arrive.
6. At approximately 7:00 p.m., Victim 1 went out to the office parking lot to place his belongings in the trunk of his car. As Victim 1 closed the trunk of the car, two men approached Victim 1 and began physically attacking him. The two men then dragged Victim 1

into a van parked near Victim 1's car. A third man was sitting in the driver's seat of the van. Inside the van, the men pulled Victim 1's jacket over his head, bound his head with tape, and bound his hands and arms with zip ties and duct tape. The van departed the parking lot with Victim 1 inside.

7. After several minutes of driving, the van pulled off the side of the road and stopped. The men then began beating Victim 1, kicking and punching him. The men told Victim 1 that they were sent by Victim 1's then-wife to obtain a get from him and that they were willing to do whatever needed to be done, including breaking Victim 1's bones. Victim 1 was then electrically shocked with a stun gun on his fingers and genitals.

8. At some point during the beating, RUBIN entered the front seat of the van.

9. Thereafter, a rabbi carrying a video camera also entered the front seat of the van. The rabbi told Victim 1 to repeat the words necessary to consent to a get. Victim 1 initially refused, at which point the driver of the van began stomping on Victim 1. After a few minutes of beating, Victim 1 relented and recited the words as directed by the rabbi.

10. Victim 1 was then driven in the van to another location, where he was tossed out of the van. The van drove off and Victim 1 was left on the side of the road. Victim 1 then made his way to a nearby house, where he was able to call for help. Victim 1 was then transported to a hospital emergency room, where he was treated for broken ribs, a bruised spine and other injuries.

11. On or about January 15, 2014, Victim 1 was shown a photo array and positively identified EPSTEIN as one of the men who attacked him in November 2009.