

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Claire C. Cecchi
v. : Criminal No.: 14-
WILLIAM A. BRUDER : 18 U.S.C. § 1962(d)

INFORMATION
(Racketeering Conspiracy)

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

Background

1. At all times relevant to this Information:

The Racketeering Enterprise

a. A website (hereinafter the "Website") was used to promote and facilitate an illegal sports betting and gambling business in northern New Jersey and elsewhere. The Website was maintained in Costa Rica and, at times, referred to as the "office." The individuals who owned, operated, and directed the activities of the Website conspired with individuals known as "electronic bookies" or "agents," who established illegal gambling businesses in New Jersey and elsewhere. Many agents also maintained a network of "sub-agents," who operated at the direction of the agents in furtherance of the illegal gambling businesses. The agent, sub-agent, or their co-conspirators issued usernames and passwords to individual bettors who, through the Website, placed wagers on, among other things, sporting events. Through the Website,

the agent, sub-agent, and their co-conspirators were then able to track each individual bettor, his or her wagers, and each bettor's weekly "wins" and "loses." This "electronic portfolio" was referred to as the agent's or sub-agent's "package." The owners, operators, and employees of the Website, together with the agents and sub-agents, constituted a criminal enterprise, as that term is defined in Title 18, United States Code, Section 1961(4)(hereinafter the "Criminal Enterprise"). The Criminal Enterprise constituted an ongoing organization whose members functioned as a continuing unit that had a common purpose of achieving the objectives of the Criminal Enterprise. Although wagers were placed through the Website, as described above, all pay outs of gambling winnings and collections of gambling losses were made in person between meetings with the bettor and the agents, sub-agents, and their co-conspirators.

The Defendant and Other Parties and Entities

b. Co-Conspirator One, an individual not named as a defendant herein, operated and maintained an interest in the Website and was a member of the Criminal Enterprise.

c. Co-Conspirator Two, an individual not named as a defendant herein, was employed by and acted as an agent for the Website and was a member of the Criminal Enterprise.

d. Defendant WILLIAM A. BRUDER, a resident of Bayonne, New Jersey, a resident of Bayonne, New Jersey, was a sub-agent for the Website

and an associate of the Criminal Enterprise who issued usernames and passwords to bettors and made collections of gambling debts.

e. Co-Conspirator Three, an individual not named as a defendant herein, was a resident of Bayonne, New Jersey. Co-Conspirator Three was an agent for the Website and an associate of the Criminal Enterprise who directed the activities of sub-agents in furtherance of the Criminal Enterprise.

f. Co-Conspirator Four, an individual not named as a defendant herein, was a resident of Bayonne, New Jersey. Co-Conspirator Four was a sub-agent for the Website and an associate of the Criminal Enterprise.

The Purposes of the Criminal Enterprise

2. The purposes of the Criminal Enterprise included the following: (a) enriching the owners, operators, employees, agents, sub-agents of the Website and their co-conspirators; and (b) avoiding law enforcement detection of their illegal activities and the proceeds derived through those activities.

The Racketeering Conspiracy

3. From in or about early 2008 and continuing through in or about May 2012, in Hudson County, in the District of New Jersey and elsewhere, defendant

WILLIAM A. BRUDER

being a person employed by and associated with the Criminal Enterprise, an enterprise that was engaged in, and the activities of which affected, interstate and foreign commerce, knowingly and intentionally conspired and agreed with Co-Conspirator One, Co-Conspirator Two, Co-Conspirator Three, Co-Conspirator Four, and others to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the enterprise's affairs through a pattern of racketeering activity and through the collection of unlawful debt.

4. The pattern of racketeering activity, as that term is defined by Title 18, United States Code, Sections 1961(1) and 1961(5), through which defendant WILLIAM A. BRUDER, together with others, agreed to conduct, and participate, directly and indirectly, in the conduct of the affairs of the enterprise consisted of multiple acts indictable under federal law, namely, Title 18, United States Code, Sections 1084 (transmission of wagering information related to sports betting in interstate and foreign commerce) and 1955 (prohibition of illegal gambling businesses). It was part of the conspiracy that defendant WILLIAM A. BRUDER and his co-conspirators each agreed that a

conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise.

5. The collection of unlawful debt, as that term is defined by Title 18, United States Code, Section 1961(6), through which defendant WILLIAM A. BRUDER, together with others, agreed to conduct, and participate, directly and indirectly, in the conduct of the affairs of the enterprise consisted of the collection of multiple debts incurred and contracted in gambling activity which was in violation of the laws of the State of New Jersey, and which was incurred in connection with the business of gambling in violation of the laws of the State of New Jersey. It was part of the conspiracy that defendant WILLIAM A. BRUDER and his co-conspirators each agreed that a conspirator would commit at least one collection of unlawful debt in the conduct of the affairs of the enterprise.

All in violation of Title 18, United States Code, Section 1962(d).

FORFEITURE ALLEGATION

1. The allegations set forth in Count One of this Information are hereby realleged as if fully set forth herein for the purpose of alleging forfeiture to the United States of America of property in which defendant WILLIAM A. BRUDER has an interest.

2. Upon conviction of the offense alleged in Count One of this Information and under Title 18, United States Code, Sections 1963, 981(a)(1)(C), and Title 28, United States Code, Section 2461, defendant WILLIAM A. BRUDER shall forfeit to the United States any and all right, title, and interest in any and all property constituting or derived from any proceeds said defendant obtained, directly or indirectly, as a result of the offense alleged in Count One of the Information, and any and all property traceable to such property, namely, a forfeiture money judgment in the amount of \$2,000 in United States currency, in that this sum represents the amount of proceeds obtained by defendant WILLIAM A. BRUDER as a result of the offense alleged in Count One of the Information.

3. **Substitute Asset**

If any of the above-described forfeitable property, as a result of any act or omission of defendant WILLIAM A. BRUDER:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- 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 which cannot be divided without difficulty;

then the United States shall be entitled to forfeiture of substitute property under Title 18, United States Code, Section 1963(m) and Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(b).

All pursuant to Title 18, United States Code, Sections 1963 and 981(a)(1)(C), Title 28, United States Code, Section 2461, and the procedures set forth in Fed. R. Crim. P. 32.2.



PAUL J. FISHMAN
United States Attorney

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UNITED STATES OF AMERICA

v.

WILLIAM A. BRUDER

INFORMATION FOR

Title 18, United States Code, Section 1962(d)

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