

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
NORTHERN DIVISION

CASE NO. _____

33 U.S.C. § 1311(a)
33 U.S.C. § 1319(c)(2)(A)
33 U.S.C. § 1344
18 U.S.C. § 2

UNITED STATES OF AMERICA

v.

PALM BEACH POLO HOLDINGS, INC. and
GLENN STRAUB,

Defendants.

_____/

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times material to this Indictment:

THE DEFENDANTS

1. Defendant **PALM BEACH POLO HOLDINGS, INC.**, was a Florida Corporation with its principal place of business located in the Village of Wellington, in Palm Beach County Florida.
2. **PALM BEACH POLO HOLDINGS, INC.** was the owner of a parcel of land within the Wellington Country Place Planned Unit Development (PUD), known as Peacock Pond, located in Section 21, Township 44 South, Range 41 East, Village of Wellington, Palm Beach County, Florida.
3. **PALM BEACH POLO HOLDINGS, INC.** was also the owner of a parcel of land

within the Wellington Country Place PUD, known as Parcel F and POD F, located in Section 20, Township 44 South, Range 41 East, Village of Wellington, Palm Beach County, Florida.

4. Defendant **GLENN STRAUB**, a resident of Palm Beach County, Florida, was the President and key responsible corporate officer of **PALM BEACH POLO HOLDINGS, INC.**, and made all significant business decisions for the company.

COUNT 1
UNLAWFUL DISCHARGE OF FILL INTO WATERS OF UNITED STATES
(33 U.S.C. §§ 1311(a), 1319(c)(2)(A))

1. Paragraphs 1, 2 and 4 of the General Allegations section of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

2. From in or around June 22, 2005, through in or around June 23, 2005, at Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

PALM BEACH POLO HOLDINGS, INC. and
GLENN STRAUB,

did knowingly discharge, cause to be discharged, and aid and abet the discharge of pollutants, from a point source into waters of the United States, including wetlands within the area of Peacock Pond, located in Section 21, Township 44 South, Range 41 East, Village of Wellington, Palm Beach County, Florida, without a permit issued pursuant to Title 33, United States Code, Section 1344(a).

In violation of Title 33, United States Code, Sections 1311(a) and 1319(c)(2)(A), and Title 18, United States Code, Section 2.

COUNT 2
UNLAWFUL DISCHARGE OF FILL INTO WATERS OF UNITED STATES
(33 U.S.C. §§ 1311(a), 1319(c)(2)(A))

1. Paragraphs 1, 3 and 4 of the General Allegations section of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

2. From in or around June 22, 2005, through in or around July 20, 2005, at Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

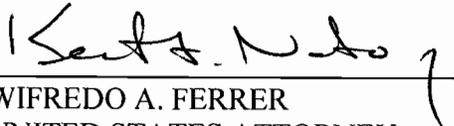
PALM BEACH POLO HOLDINGS, INC. and
GLENN STRAUB,

did knowingly discharge, cause to be discharged, and aid and abet the discharge of pollutants, from a point source into waters of the United States, including wetlands within the area of Parcel F, also known as POD F, located in Section 20, Township 44 South, Range 41 East, Village of Wellington, Palm Beach County, Florida, without a permit issued pursuant to Title 33, United States Code, Section 1344(a).

In violation of Title 33, United States Code, Sections 1311(a) and 1319(c)(2)(A), and Title 18, United States Code, Section 2.

A TRUE BILL

FOREPERSON



WIFREDO A. FERRER
UNITED STATES ATTORNEY



JOSE A. BONAUA
ASSISTANT U.S. ATTORNEY