

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 16-
 v - 18 U.S.C. § 1952(a)(3) & § 2
 : :
ROBERT W. MILLER : INFORMATION

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

1. At all times relevant to this Information:

a. Defendant ROBERT W. MILLER ("defendant MILLER") operated RWM Associates, Inc. ("RWM"), a corporation, one of the purposes of which, according to its certificate of incorporation, was "[t]o carry on the business of acting as a personnel department for small and medium sized businesses, including, but not limited to, setting up compensation plans, benefit plans, engaging in employment of personnel, including interviewing, hiring and placement, in all branches and for any other purposes consistent with the laws of the State of New Jersey." Defendant MILLER served as a Borough Councilmember for the Borough of Westwood for approximately seven years, a position from which he resigned in 2015. He had previously served as a Village Councilmember for the Village of Ridgewood from approximately 1996 to 1998.

b. Defendant ROBERT W. MILLER held himself out as a

businessman who, as the owner of RWM, for a fee of between \$500 to \$2,500, could provide a massage therapy training certificate and a transcript listing the classes taken and grades earned to anyone who wished to obtain a massage license within the State of New Jersey without receiving the required training. In addition to providing these documents, defendant MILLER held himself out as being willing to submit these fraudulent documents to the New Jersey Board of Massage and Bodywork Therapy on behalf of his customers.

c. Defendant ROBERT W. MILLER provided fraudulent massage therapy training certificates to approximately twenty-five different massage parlors located in several counties within the District of New Jersey, including, but not limited to, Union, Passaic, Hudson and Middlesex Counties.

d. Defendant ROBERT W. MILLER created at least fifty fraudulent massage therapy training certificates containing false information, including, but not limited to, dates of training, hours of training, classes taken and grades earned.

e. Defendant ROBERT W. MILLER also operated and controlled A.R.M. Enterprises, L.L.C. ("ARM") which purported to be an advertising agency located in Westwood, New Jersey.

f. Defendant ROBERT W. MILLER held himself out as someone who, using ARM, could place advertisements in newspapers for massage parlors using discrete wording which signaled that the

massage parlor was also a prostitution business.

g. There were several massage parlors located within the District of New Jersey which also operated as prostitution businesses, the workers for which defendant ROBERT W. MILLER provided fraudulent massage therapy training certificates and transcripts and for which defendant MILLER placed advertisements in local newspapers for a fee. These businesses affected interstate commerce.

h. Defendant MILLER also represented to many massage parlor owners that he would provide advanced notice to them of any law enforcement investigations into prostitution-related activities happening at their business.

i. Massage Parlor Owner 1 used defendant ROBERT W. MILLER's company, RWM, to obtain massage therapy training certificates for Massage Parlor Owner 1's workers without receiving the required training. Massage Parlor Owner 1 operated a massage parlor in Middlesex County within the District of New Jersey which Massage Parlor Owner 1 used to promote prostitution.

2. From in or about January 1997 to in or about August 2013, in the District of New Jersey and elsewhere, defendant

ROBERT W. MILLER

did knowingly and intentionally use and cause the use of facilities in interstate commerce with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment,

and carrying on of an unlawful activity - namely, the business of prostitution, contrary to N.J. Stat. 2C:34-1(b), and thereafter performed and attempted to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment and carrying on of the unlawful activity, as set forth below:

| USE OF INTERSTATE FACILITY | SUBSEQUENT ACTS |
|---|--|
| <p>On or about June 10, 2013, in Bergen County, New Jersey, at approximately 1:14 p.m., defendant ROBERT W. MILLER received an e-mail over his computer, that had been transmitted via an out-of-state server, from Massage Parlor Owner 1 setting forth the name, date of birth, home address and telephone number of three workers, and seeking to acquire certificates and official transcripts on behalf of these workers falsely claiming that they had completed 650 hours of Massage Therapy training through RWM Associates, Inc. in order to facilitate their participation in acts of prostitution at Massage Parlor Owner 1's place of business in Middlesex County, New Jersey.</p> | <p>(A) On or about June 15, 2013, in Bergen County, New Jersey, defendant MILLER created Certificates of Achievement falsely claiming that these three workers had "successfully completed the 650 hour Massage Therapy training certificate program" offered by RWM Associates, Inc., knowing that they had not completed such training.</p> <p>(B) On or about June 15, 2013, in Bergen County, New Jersey, defendant MILLER created fraudulent transcripts for these same three workers reflecting the number of hours of training purportedly received by them in specified categories of massage training, and setting forth the grades purportedly awarded to them for their participation in this training.</p> |
| <p>On or about June 10, 2013, in Bergen County, New Jersey, at approximately 1:56 p.m., defendant ROBERT W. MILLER received an e-mail over his computer, that had been transmitted via an out-of-state</p> | <p>(A) On or about June 15, 2013, in Bergen County, New Jersey, defendant MILLER created a Certificate of Achievement falsely claiming that this worker had "successfully completed the 650 hour Massage Therapy training</p> |

server, from Massage Parlor Owner 1 with the subject heading of "[o]ne more girl," setting forth the name, date of birth, home address and telephone number of a worker, and seeking to acquire a certificate and official transcript on behalf of this worker falsely claiming that this individual had completed 650 hours of Massage Therapy training through RWM Associates, Inc. in order to facilitate the worker's participation in acts of prostitution at Massage Parlor Owner 1's place of business in Middlesex County, New Jersey. Massage Parlor Owner 1 also asked in the e-mail "[w]hen they have to pay for school?"

On or about June 10, 2013, in Bergen County, New Jersey, at approximately 2:36 p.m., defendant ROBERT W. MILLER received an e-mail over his computer, that had been transmitted via an out-of-state server, from Massage Parlor Owner 1 with the subject heading of "[a]nd one more girl," setting forth the name, date of birth, home address and telephone number of another worker, and seeking to acquire a certificate and official transcript on behalf of this worker falsely claiming that this individual had completed 650 hours of Massage Therapy training through RWM Associates, Inc. in order to facilitate the worker's participation in acts of prostitution at Massage Parlor Owner 1's place of business in Middlesex County, New Jersey.

certificate program" offered by RWM Associates, Inc., knowing that the worker had not completed such training.

(B) On or about June 15, 2013, in Bergen County, New Jersey, defendant MILLER created a fraudulent transcript for this worker reflecting the number of hours of training purportedly received by this individual in specified categories of massage training, and setting forth the grades purportedly awarded for the worker's participation in this training.

(A) On or about June 15, 2013, in Bergen County, defendant MILLER created a Certificate of Achievement falsely claiming that this same worker had "successfully completed the 650 hour Massage Therapy training certificate program" offered by RWM Associates, Inc., knowing that the worker had not completed such training.

(B) On or about June 15, 2013, defendant MILLER created a fraudulent transcript for this worker reflecting the number of hours of training purportedly received by this individual in specified categories of massage training, and setting forth the grades purportedly awarded for the worker's participation in this training.

In violation of Title 18, United States Code, Section 1952(a)(3)
and Section 2.

Paul J. Fishman/rah

PAUL J. FISHMAN
United States Attorney

CASE NUMBER: _____

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

ROBERT W. MILLER

INFORMATION FOR

Title 18, United States Code, Section 1952(a)(3) and Section 2

PAUL J. FISHMAN

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