

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Anne E. Thompson

v. : Crim. No. 20-575 (AET)

STEVEN BRYCE : 18 U.S.C. §§ 371, 981(a)(1)(C), 1952(a)(3), and 2, 26
: U.S.C. § 7206(1), and 28 U.S.C. § 2461(c)

INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark, charges:

COUNT 1

(Conspiracy to Violate the Travel Act)

1. During the time period relevant to Count 1 of this Indictment:

A. Defendant STEVEN BRYCE (“defendant BRYCE”) was a resident of Monmouth County, New Jersey. Defendant BRYCE owned Reno Real Estate & Investments Limited Liability Company.

B. John Dougherty (“Dougherty”) was an associate of defendant BRYCE.

2. From in or about January 2011 to in or about October 2017, in Monmouth County, in the District of New Jersey, and elsewhere, defendant

STEVEN BRYCE

knowingly and intentionally did conspire, combine, confederate, and agree with others, including Dougherty, to use and cause to be used facilities in interstate commerce with the intent to promote, manage, establish, and carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity – namely, a business enterprise involving gambling, contrary

to Chapter 37 of Title 2C of New Jersey Statutes Annotated (N.J.S.A. 2C:37-2) – and thereafter to perform acts to promote, manage, establish, and carry on, and facilitate the promotion, management, establishment, and carrying on of such unlawful activity, contrary to Title 18, United States Code, Section 1952(a)(3).

Object of the Conspiracy

3. It was the object of the conspiracy that defendant BRYCE and others, including Dougherty, would use and cause the use of a private or commercial interstate carrier, wire facilities, and other facilities in interstate commerce to promote, manage, establish, carry on, and facilitate an unlawful gambling business.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that:
- A. defendant BRYCE supervised and directed associates who served as his agents, including Dougherty, who had their own groups of bettors;
 - B. defendant BRYCE communicated directly with bettors;
 - C. defendant BRYCE gave access to agents and bettors to websites that were used to conduct sports betting;
 - D. defendant BRYCE, agents, and defendant BRYCE's and agents' bettors used the internet to access websites that were used to conduct sports betting;
 - E. defendant BRYCE and agents used cell phones to communicate with each other and their bettors through phone calls and by text messages;
 - F. defendant BRYCE at various times changed the cell phone number that he used to

communicate with agents and bettors who engaged in gambling through defendant BRYCE;

G. defendant BRYCE referred to himself in text messages that he sent to agents and bettors who engaged in gambling through him by the code name “Reno;”

H. defendant BRYCE met with agents at locations in New Jersey to receive portions of the money that agents collected from their bettors for bets that they lost;

I. defendant BRYCE met with bettors who engaged in gambling through him at locations in New Jersey to pay money to bettors for bets that they won and to collect from bettors for bets that they lost; and

J. defendant BRYCE and Dougherty, while Dougherty was in New Jersey, used and caused to be used a facility in interstate commerce, namely, a private and commercial interstate carrier, to deliver and receive money owed to or by Dougherty’s bettors as a result of their gambling activity.

Overt Acts

5. In furtherance of the conspiracy and to effect its object, the following overt acts were committed in the District of New Jersey and elsewhere:

A. On or about January 18, 2017, defendant BRYCE sent Dougherty a text message, identifying defendant BRYCE by the code name “Reno,” and informing Dougherty that the text message was from a new cell phone number that defendant BRYCE was using.

B. On or about January 18, 2017, defendant BRYCE sent one of his agents (“Agent 1”) a text message, informing Agent 1 that the text message came from defendant BRYCE’s “new phone number.”

C. On or about January 22, 2017, defendant BRYCE received a text message from Agent 1, asking if defendant BRYCE could change the password that one of Agent 1’s bettors used to access a website that was used to conduct sports betting.

D. On or about January 23, 2017, defendant BRYCE sent a text message to Agent 1, indicating that the password for Agent 1’s bettor had been changed.

E. On or about January 23, 2017, defendant BRYCE received a text message from an individual who had served as one of defendant BRYCE’s agents (“Agent 2”), stating, in part, that Agent 2 would “wait until we get everything straightened out with” a sports betting website to which defendant BRYCE had given Agent 2 access.

F. On or about February 12, 2017, defendant BRYCE received the following text messages from Dougherty about one of Dougherty’s bettors located outside of New Jersey, whom Dougherty referred to by the User Identification Number 561 that the bettor used to access a sports betting website (hereinafter this bettor is referred to as “561”):

Text Message #	Text Message
1	“Something is wrong with him winning like this. ...561 doesn't pay me 5 k settle up last week, I text him again about it and never replies.... now he's up”
2	“big and I'm sure expects it on time. I'm very annoyed obviously.”

G. On or about February 12, 2017, defendant BRYCE received a text message from Dougherty that asked, in substance, that defendant BRYCE check if bets that were placed on a

website by 561 and under a different User Identification Number, 560, were “coming from same computer/ip address.”

H. On or about February 13, 2017, defendant BRYCE responded to Dougherty in a text message stating, “Just saw final numbers. Wtf. I have a call in to” an individual who assisted in operating the website that was used by 561.

I. On or about February 22, 2017, Dougherty used the internet to access the website that was used by 561 and saw bets that 561 had placed.

J. On or about February 23, 2017, defendant BRYCE received text messages from Dougherty, which stated in pertinent part:

Text Message #	Text Message
1	“I saw 561 picks last night. . . .”
2	“It seems as if he’s buying points for free. . . .”

K. On or about February 27, 2017, defendant BRYCE and Dougherty exchanged the following text messages about 561 and another of Dougherty’s bettors, who was located outside of New Jersey (“Individual 1”), which provided in pertinent part:

Text Message #	Source	Text Message
1	DOUGHERTY CELL PHONE	“[Individual 1] owes 43K . . .”
2	DEFENDANT BRYCE CELL PHONE	“[Individual 1’s] # getting crazy.”

Text Message #	Source	Text Message
3	DOUGHERTY CELL PHONE	"561 is at 12,500. We settle at 15 now."

L. On or about March 7, 2017, defendant BRYCE received text messages from Dougherty asking, in substance, whether a particular "888" telephone number (the "888 telephone number") was "the agent number for service" for a website that was used to conduct sports betting.

M. At or about the same time that Dougherty sent the text messages referenced in Paragraph 5.L above, on or about March 7, 2017, while he was in New Jersey, Dougherty used his cell phone to call the 888 telephone number.

N. On or about March 20, 2017, defendant BRYCE and Dougherty exchanged the following text messages about Individual 1 and 561, which provided in pertinent part:

Text Message #	Source	Text Message
1	DOUGHERTY CELL PHONE	"[Individual 1] over 36....561, over 37....."
2	DOUGHERTY CELL PHONE	"Getting 35k tomorrow before 10am. 561 is gold with paying...may want to reconsider lowering his limits. Just a thought....don't want him to walk away bei[ng]"
3	DOUGHERTY CELL PHONE	"offended. I realize he got lucky though and that week was brutal. Anyway, I can pay you most tomorrow after it comes."
4	DEFENDANT BRYCE CELL PHONE	"Cool. Keep me posted tomorrow. Drop limits after tournament"

O. On or about March 21, 2017, defendant BRYCE sent Dougherty a text message stating, "Let me know when the eagle has landed. Thanks."

P. On that same day, on or about March 21, 2017, in Keyport, New Jersey, Dougherty received a UPS Express Box that was sent by 561 from outside of New Jersey, which contained a substantial amount of cash for gambling losses incurred by 561.

Q. Subsequently, on or about March 21, 2017, defendant BRYCE received a text message from Dougherty stating, "Eagle has landed. Gonna count now," attached to which was a photograph of the UPS Express Box that was sent by 561.

R. On or about March 27, 2017, defendant BRYCE and Dougherty exchanged the following text messages about Individual 1, which provided in pertinent part:

Text Message #	Source	Text Message
1	DOUGHERTY CELL PHONE	"[Individual 1] owes 36,347 total. He was getting the no juice last 2 weeks also on plays."
2	DEFENDANT BRYCE CELL PHONE	"I would accommodate [Individual 1] this time but MUST be paid in full. Cash no checks. . . ."
3	DOUGHERTY CELL PHONE	"Told him what we talked about. Paying cash Friday...all of it. I told him 32 was the number. He said he would get back to me but it sounded good. I guess"
4	DOUGHERTY CELL PHONE	"like he pretended that he had to run it by someone...."

S. On or about March 31, 2017, defendant BRYCE received a text message from Dougherty, stating, “Gonna count. Let’s hope,” to which was attached a photograph of a brown envelope and cash.

T. Later, on or about March 31, 2017, defendant BRYCE and Dougherty exchanged the following text messages about Individual 1:

Text Message #	Source	Text Message
1	DEFENDANT BRYCE CELL PHONE	“[Individual 1] 32?”
2	DOUGHERTY CELL PHONE	“Yes. Hoping”

U. Subsequently, on or about March 31, 2017, defendant BRYCE and Dougherty exchanged the following text messages about Individual 1:

Text Message #	Source	Text Message
1	DOUGHERTY CELL PHONE	“Wow. Miracles do happen. All here. I even said to him if he couldn't get all of it to roll 2 and give me 30. So he actually gives me 32. I think this is”
2	DOUGHERTY CELL PHONE	“another bargaining chip down the line knowing him. Lol Lets keep track of his play going forward from week ending 4-2-16 going forward. . . .”
3	DEFENDANT BRYCE CELL PHONE	“Agree 100%. I will keep track too.”

V. On or about July 30, 2017, defendant BRYCE received the following text messages from Dougherty about a website that was used to conduct sports betting:

Text Message #	Text Message
1	“Hey, as of yesterday I can't access the ‘weekly balance’ link on agents page. Can't do it on phone or computer. Then I saw a message to call [an individual who assisted in operating a website that was used to conduct sports betting] on th[e]”
2	“site. Just letting u know in case u don't.”

W. On or about September 29, 2017, defendant BRYCE received a text message from Agent 1, stating, in substance, that Agent 1 had delivered cash to an individual to whom defendant BRYCE had directed Agent 1 make the payment.

X. On or about October 2, 2017, defendant BRYCE used the internet to access the sports betting website that was used by one of Dougherty’s bettors with the User Identification R560 that was employed to access that website.

Y. On or about October 2, 2017, defendant BRYCE sent a text message to Dougherty, directing Dougherty, in substance, to “keep trying” to communicate with an individual who assisted in operating the website that was used by Dougherty’s bettor with the User Identification R560.

In violation of Title 18, United States Code, Section 371.

COUNTS 2 to 4

(Use and Aiding, Abetting, and Causing the Use of Facilities in Interstate Commerce to Promote, Manage, Establish, Carry On, and Facilitate an Unlawful Gambling Business)

1. Paragraphs 1 and 4 to 5 of Count 1 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

2. On or about the dates set forth below, in Monmouth County, in the District of New Jersey, and elsewhere, defendant

STEVEN BRYCE

knowingly did use and aid, abet, and cause the use of facilities in interstate commerce with the intent to promote, manage, establish, and carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity – namely, a business enterprise involving gambling, contrary to Chapter 37 of Title 2C of New Jersey Statutes Annotated (N.J.S.A. 2C:37-2) – and, thereafter, did perform and attempt to perform an act to promote, manage, establish, and carry on, and facilitate the promotion, management, establishment, and carrying on of such unlawful activity, as follows:

Count	Date	Use of Facility in Interstate Commerce	Act Performed Thereafter
2	February 22, 2017	Dougherty’s use of the internet to access the website that was used by 561 to conduct sports betting and see bets that 561 had placed.	Defendant BRYCE’s receipt on or about February 23, 2017 of a text message from Dougherty stating, in part, that “It seems as if [561’s] buying points for free.”
3	March 21, 2017	Dougherty’s causing the use of UPS’s shipping services to	Defendant BRYCE’s receipt on or about March 21, 2017 of a

		receive a UPS Express Box that was sent by 561 from outside of New Jersey, which contained a substantial amount of cash for gambling losses incurred by 561.	text message from Dougherty stating, "Eagle has landed. Gonna count now," attached to which was a photograph of the UPS Express Box that was sent by 561.
4	October 2, 2017	Defendant BRYCE's use of the internet to access the website that was used by Dougherty's bettor with the User Identification R560.	Defendant BRYCE's transmission on or about October 2, 2017 of a text message to Dougherty, directing Dougherty, in substance, to "keep trying" to communicate with an individual who assisted in operating the website that was used by Dougherty's bettor with the User Identification R560.

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

COUNTS 5 to 8**(Subscribing to False Tax Returns)**

1. Paragraphs 1 and 4 to 5 of Count 1 of this Indictment are realleged and incorporated by reference as though fully set forth herein.
2. The Internal Revenue Service (“IRS”), an agency within the United States Department of Treasury, was responsible for administering and enforcing the tax laws of the United States, including the federal income tax laws.
3. From at least in or about July 2014 to in or about March 2017, defendant BRYCE electronically signed, filed, and caused to be filed with the IRS U.S. Individual Income Tax Returns, Forms 1040, for the calendar years listed below on his and his spouse’s behalf (the “Tax Returns”), which falsely stated that they had total income in the amounts referred to below:

Calendar Year	Approximate Amount of Total Income Reported
2013	\$112,899
2014	\$164,705
2015	\$215,655
2016	\$220,759

The Tax Returns for calendar years 2013 to 2016 were not true and correct as to every material matter, as defendant BRYCE well knew, in that: (a) in each of those calendar years, defendant BRYCE received tens of thousands of dollars from his gambling business, and (b) as a result of his gambling business, defendant BRYCE had income substantially in excess of the amounts reported on the Tax Returns for calendar years 2013 to 2016, each of which contained a written

declaration that it was filed under penalties of perjury.

4. On or about the dates set forth below, in Monmouth County, in the District of New Jersey, and elsewhere, defendant

STEVEN BRYCE

willfully did make and subscribe the Tax Returns for the calendar years listed below, each of which contained and was verified by a written declaration that it was made under the penalties of perjury and each of which he did not believe to be true and correct as to material matters, as set forth in Paragraph 3 above:

Count	Date	Calendar Year
5	July 14, 2014	2013
6	March 20, 2015	2014
7	March 22, 2016	2015
8	March 31, 2017	2016

In violation of Title 26, United States Code, Section 7206(1).

Forfeiture Allegations as to Counts 1 to 4

1. The allegations contained in all Paragraphs of Counts 1 to 4 of this Indictment are hereby realleged and incorporated by reference for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 981 and Title 28, United States Code, Section 2461(c).

2. As a result of committing the offenses charged in Counts 1 to 4 of this Indictment, defendant

STEVEN BRYCE

shall forfeit to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), all property, real and personal, that constituted and was derived from proceeds traceable to the commission of the offenses charged in Counts 1 to 4.

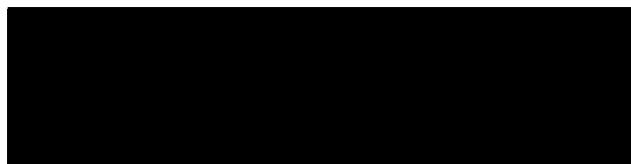
Substitute Assets Provision
(Applicable to All Forfeiture Allegations)

3. If any of the above-described forfeitable property, as a result of any act or omission of defendant BRYCE:

- 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;

the United States shall be entitled, pursuant to 21 U.S.C. § 853(p) (as incorporated by 28 U.S.C.

§ 2461(c)), to forfeiture of any other property of defendant BRYCE's up to the value of the above-described forfeitable property.



A TRUE BILL

Craig Carpenito
CRAIG CARPENITO
UNITED STATES ATTORNEY

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UNITED STATES OF AMERICA

v.

STEVEN BRYCE

INDICTMENT FOR

18 U.S.C. §§ 371, 981(a)(1)(C), 1952(a)(3), and 2;
26 U.S.C. § 7206(1); 28 U.S.C. § 2461(c)

Foreperson

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