

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

\*

CRIMINAL NO. 14-147

v.

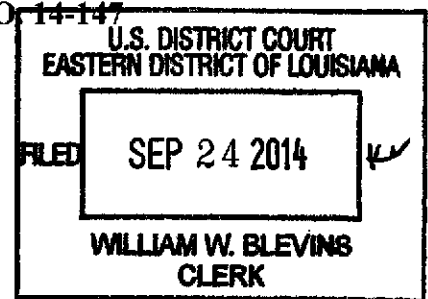
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SECTION: C

FRANK FRABBIELE

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FACTUAL BASIS

The defendant, **FRANK FRABBIELE** (hereinafter "**FRABBIELE**"), has agreed to plead guilty as charged to the Bill of Information now pending against him, charging **FRABBIELE** with transmission of wagering information, in violation of Title 18, United States Code, Section 1084(a) (Count One) and money laundering, in violation of Title 18, United States Code, Sections 1957 and 2 (Count Two). Both the Government and the defendant do hereby stipulate and agree that the following facts set forth a sufficient factual basis for the crimes to which **FRABBIELE** is pleading guilty. The Government and **FRABBIELE** further stipulate that the Government would prove, through the introduction of competent testimony and admissible, tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the Bill of Information now pending against **FRABBIELE**:

***I. Transmission of Wagering Information***

At all times relevant, in the Eastern District of Louisiana, the Defendant, **FRANK FRABBIELE**, was engaged in the business of betting and gambling as a bookmaker for sporting events, including football. Beginning not later than about January 2008, and continuing continuously thereafter up to and including April 9, 2014, **FRABBIELE**, being engaged in the business of betting and wagering, did knowingly use a wire communication facility, to wit: a

computer, for the transmission in interstate commerce, of information assisting in the placing of bets and wagers on football, basketball, and baseball, sporting events and contests, in violation of Title 18, United States Code, Section 1084(a).

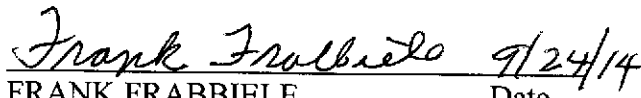
**FRABBIELE** used a “pay-per-head” betting website based in the country of Costa Rica to track, record, and register bets and clients. Specifically, **FRABBIELE** would direct clients to the website, where wire communications allowed clients’ bets to be recorded, tracked, and totaled. **FRABBIELE** used a computer to transmit and receive, between Abita Springs, Louisiana, and the country of Costa Rica, wire communications via the website to ~~set the proper~~ <sup>JSG</sup> “~~point spread~~” <sup>284</sup> for each particular sporting event, set minimum and maximum bets for his customers, and track the bets his clients placed. **FRABBIELE** paid the website a per-client fee. **FRABBIELE** “settled up” with his clients (*i.e.*, paid them their winnings or received money owed to him by clients who lost bets) in person throughout the greater New Orleans area. **FRABBIELE’S** use of the Costa Rica-based website, through wire communications between Abita Springs, Louisiana, and servers located in Costa Rica, enabled him to obtain information that assisted in the placement and recording of bets and wagers, all in violation of Title 18, United States Code, Section 1084(a). **FRABBIELE** would also occasionally call Costa Rica via telephone to inform them when a payment was received or paid out.

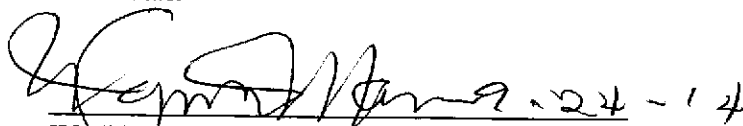
## ***II. Money Laundering***

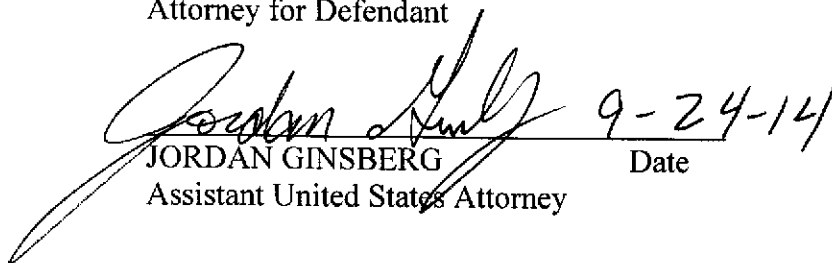
**FRABBIELE’S** bookmaking business was primarily a cash business. **FRABBIELE** would receive and input current point spreads and track bets made by his clients via his personal computer, as described above. **FRABBIELE** used the proceeds from his illegal bookmaking operation in various ways. Specifically, on November 15, 2012, in the Eastern District of Louisiana, **FRABBIELE** did knowingly conduct a monetary transaction, to wit, causing to be

deposited approximately twenty thousand dollars (\$20,000.00) in cash into a safe deposit box with Home Bank, knowing that the monetary transaction involved criminally derived property that was derived from the aforementioned specified unlawful activity, all in violation of Title 18, United States Code, Sections 1957 and 2.

The foregoing facts would be proven by the testimony of agents from the Federal Bureau of Investigation and the Internal Revenue Service, the production of various certified documents, and the statements of the defendant, **FRANK FRABBIELE**.

  
FRANK FRABBIELE      9/24/14  
Defendant      Date

  
WAYNE MANCUSO      9-24-14  
Attorney for Defendant      Date

  
JORDAN GINSBERG      9-24-14  
Assistant United States Attorney      Date