

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

MIAMI DIVISION
00-0131 CR-MORENO
NO. MAGISTRATE JUDGE

8 USC 1328 DUBÉ
18 USC 371
18 USC 2422(a)
18 USC 1956(a)(1)(A)(i)
18 USC 1957(a)
18 USC 982(a)(1) and (a)(2)
18 USC 2

UNITED STATES OF AMERICA

v.

RONALD R. EPPINGER and
LUCIE FAUBERT

INDICTMENT

The Grand Jury charges that:

COUNT 1

From in or about January 1997 through June 1999, the exact dates being unknown to the Grand Jury, at Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

RONALD R. EPPINGER, and
LUCIE FAUBERT,

did knowingly and willfully combine, conspire, confederate, and agree with persons both known and unknown to the Grand Jury to import into or attempt to import into, and keep, support, employ or harbor, in the United States, an alien for the purpose of prostitution, in violation of Title 8, United States Code, Section 1328.

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OBJECT OF THE CONSPIRACY

The primary purpose of the conspiracy was to import Czech and other Eastern European females into the United States posing as tourists for the purpose of prostitution, in order to financially enrich the defendants and their co-conspirators.

MANNER AND MEANS

It was a manner and means of the conspiracy for the defendants to periodically travel to and within the Czech Republic, and conspire with their co-conspirators to recruit Czech females willing to work as prostitutes in the United States. It was a further manner and means to assist the Czech females in obtaining tourist visas to allow them to enter the United States. It was a further manner and means of the conspiracy to instruct, manage, and supervise the Czech females who worked as prostitutes in the Southern District of Florida and elsewhere, for the financial benefit of the defendants and their co-conspirators.

OVERT ACTS

In furtherance of the conspiracy and to achieve the objects thereof, the defendants and their co-conspirators, both known and unknown to the Grand Jury, committed and caused to be committed the following overt acts in the Southern District of Florida and elsewhere:

1. In or about August or September 1998, the exact dates being unknown to the Grand Jury, the defendant, Ronald R. Eppinger, and a co-conspirator offered to assist a Czech female, that is, G.S., to travel to the United States to work as a prostitute/model.
2. In or about September of 1998, the defendants and their co-conspirators facilitated G.S.'s entry into the Southern District of Florida.
3. In or about September of 1998, after G.S. arrived in the Southern District of

Florida, she met with the defendant, Ronald R. Eppinger, who advised her that she would be working as a prostitute, and they discussed the amount of money that she would earn as a prostitute.

4. From approximately September 1998 to December 1998, and from approximately January 1999 to March 1999, the exact dates being unknown to the Grand Jury, the defendant, Ronald R. Eppinger, and a co-conspirator directed and supervised G.S.'s work as a prostitute in the Southern District of Florida.

5. In or about May 1999, the defendant, Lucie Faubert, facilitated the travel of another Czech female, that is, P.S., from the Czech Republic to the Southern District of Florida, for the purpose of prostitution.

6. On or about May 26, 1999, the defendants, Ronald R. Eppinger, and Lucie Faubert, had a conversation regarding, in part, P.S.'s prostitution activities. Eppinger complained that P.S., who had just arrived in the Southern District of Florida, was "nervous" about working as a prostitute. Faubert then spoke with P.S. and persuaded her to work as a prostitute for Eppinger.

7. On or about May 26, 1999, the defendant, Lucie Faubert promised to send her co-defendant, Ronald R. Eppinger, two more Czech females within a month, for the purpose of prostitution.

All in violation of Title 18, United States Code, Section 371.

COUNT 2

In or about May 1999, the exact dates being unknown to the Grand Jury, at Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

LUCIE FAUBERT,

did import, or attempt to import, into the United States, an alien for the purpose of prostitution, in violation of Title 8, United States Code, Section 1328, and Title 18, United States Code, Section 2.

COUNT 3

In or about May 1999, the exact dates being unknown to the Grand Jury, at Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

RONALD R. EPPINGER,

did keep, support, employ or harbor, in the United States, an alien for the purpose of prostitution, in violation of Title 8, United States Code, Section 1328, and Title 18, United States Code, Section 2.

COUNT 4

On or about April 22, 1998, the exact date being unknown to the Grand Jury, at Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

RONALD R. EPPINGER,

knowingly persuaded, induced, enticed, and coerced an individual known to the Grand Jury, that is, E.I., to travel in foreign commerce from Miami, Florida, to Nassau, Bahamas, to engage in prostitution, in violation of Title 18, United States Code, Section 2422(a).

COUNT 5

On or about May 7, 1998, the exact date being unknown to the Grand Jury, at Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

RONALD R. EPPINGER,

knowingly persuaded, induced, enticed, and coerced an individual known to the Grand Jury, that is, S.Q., to travel in interstate commerce from Miami, Florida, to New York, New York, to engage in prostitution, in violation of Title 18, United States Code, Section 2422(a).

COUNT 6

On or about May 6, 1999, the exact date being unknown to the Grand Jury, at Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

RONALD R. EPPINGER,

knowingly persuaded, induced, enticed, and coerced an individual known to the Grand Jury, that is, S.Q., to travel in interstate commerce from Miami, Florida, to New York, New York, to engage in prostitution, in violation of Title 18, United States Code, Section 2422(a).

COUNT 7

On or about May 26, 1999, the exact date being unknown to the Grand Jury, at Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

RONALD R. EPPINGER,

knowingly persuaded, induced, enticed, and coerced an individual known to the Grand Jury, that is, L.D., to travel in foreign commerce from Miami, Florida, to international waters, to engage in prostitution, in violation of Title 18, United States Code, Section 2422(a).

COUNT 8

On or about June 2, 1999, the exact date being unknown to the Grand Jury,

at Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

RONALD R. EPPINGER,

knowingly persuaded, induced, enticed, and coerced an individual known to the Grand Jury, that is, P.S., to travel in interstate commerce from Miami, Florida, to Dallas, Texas, to engage in prostitution, in violation of Title 18, United States Code, Section 2422(a).

COUNT 9

On or about June 22, 1999, the exact date being unknown to the Grand Jury, at Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

RONALD R. EPPINGER,

knowingly persuaded, induced, enticed, and coerced an individual known to the Grand Jury, that is, L.D., to travel in interstate commerce from Miami, Florida, to New York, New York, to engage in prostitution, in violation of Title 18, United States Code, Section 2422(a).

COUNT 10

On or about May 26, 1999, at Miami, Dade County, in the Southern District of Florida and elsewhere, the defendant,

RONALD R. EPPINGER,

did knowingly conduct, and attempt to conduct, a financial transaction affecting interstate commerce, to wit, the purchase of a 33-foot Donzi motor vessel, hull number DMRFB104C888, in Miami-Dade County, Florida, which transaction involved the proceeds of a specified unlawful activity, that is, proceeds from prostitution, punishable under the laws of the United States, with the intent to promote the carrying on of specified unlawful

activity, and that while conducting and attempting to conduct such financial transaction, knew that the property involved in the financial transaction, that is, approximately thirty thousand dollars (\$30,000), represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 2.

COUNT 11

On or about May 28, 1999, at Fort Lauderdale, Broward County, in the Southern District of Florida and elsewhere, the defendant,

RONALD R. EPPINGER,

did knowingly conduct, and attempt to conduct, a financial transaction affecting interstate commerce, to wit, the purchase of a 1997 Lincoln Town Car limousine, VIN number 1LNLM81W0VY617521, in Broward County, Florida, which transaction involved the proceeds of a specified unlawful activity, that is, proceeds from prostitution, punishable under the laws of the United States, with the intent to promote the carrying on of specified unlawful activity, and that while conducting and attempting to conduct such financial transaction, knew that the property involved in the financial transaction, that is, United States currency in the amount of approximately eighteen thousand dollars (\$18,000), represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 2.

COUNT 12

On or about April 9, 1999, at, Miami, Miami-Dade County, in the Southern District of Florida and elsewhere, the defendant,

RONALD R. EPPINGER,

did knowingly engage in and attempt to engage in a monetary transaction, that is, the deposit of United States currency, in the amount of approximately forty-seven thousand five hundred dollars (\$47,500), into an account at Mandaley Bay Casino in Las Vegas, Nevada, in criminally derived property of a value greater than \$10,000, which property was derived from a specified unlawful activity, that is, knowingly persuading, inducing, enticing and coercing an individual to travel in interstate commerce to engage in prostitution, in violation of Title 18, United States Code, Section 2422(a), as alleged in counts 4-9 of this indictment.

All in violation of Title 18, United States Code, Sections 1957(a) and 2.

COUNT 13

On or about April 30, 1999, at, Miami, Miami-Dade County, in the Southern District of Florida and elsewhere, the defendant,

RONALD R. EPPINGER,

did knowingly engage in and attempt to engage in a monetary transaction, that is, the deposit of United States currency, in the amount of approximately forty-five thousand dollars (\$45,000), in an account at Rio Suites Hotel and Casino in Las Vegas, Nevada, in criminally derived property of a value greater than \$10,000, which property was derived from a specified unlawful activity, that is, knowingly persuading, inducing, enticing and coercing an individual to travel in interstate commerce to engage in prostitution, in violation of Title 18, United States Code, Section 2422(a), as alleged in counts 4-9 of this indictment.

All in violation of Title 18, United States Code, Sections 1957(a) and 2.

Forfeiture; 18 U.S.C. § 982

The allegations contained in paragraphs 1 through 13 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein, for the purpose of alleging forfeitures pursuant to the provisions of Title 18, United States Code, Sections 982(a)(1) and (a)(2).

As a result of the foregoing offenses contained in Counts 10 through 13, the defendant,

RONALD R. EPPINGER,

shall forfeit to the United States all property, real and personal, involved in and constituting and derived from proceeds which the defendant, RONALD R. EPPINGER, obtained directly and indirectly as a result of the aforestated offenses, in violation of Title 18, United States Code, Sections 1956(a)(1) and 1957(a).

Such forfeitures shall include the following:

- a. \$92,500 in United States Currency, and all interest and proceeds traceable thereto, in that such sum in aggregate is property which was involved in, and derived directly and indirectly from, the aforestated offenses.
- b. A 33-foot Donzi motor vessel, hull number DMRFB104C888, in that such vessel is property which was obtained with \$30,000 of proceeds involved in, and derived directly and indirectly from, the aforestated offenses.
- c. A 1997 Lincoln Town Car limousine, VIN number

1LNLM81W0VY617521, in that such vehicle is property which was obtained with \$18,000 of proceeds involved in, and derived directly and indirectly from, the aforestated offenses.

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

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred, or sold to, or deposited with a third party;
- (3) has been placed beyond the jurisdiction of the Court; or
- (4) has been commingled with other property which cannot be subdivided with difficulty; it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b)(1), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

In violation of Title 18, United States Code, Sections 982(a)(1) and (a)(2).

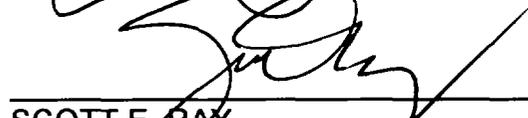
A TRUE BILL



FOREPERSON



THOMAS E. SCOTT
UNITED STATES ATTORNEY



SCOTT E. RAY
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA - **00-0131** CR-MORENO CASE NO. _____

v.

CERTIFICATE OF TRIAL ATTORNEY MAGISTRATE JUDGE
DUBÉ

RONALD EPPINGER, and
LUCIE FAUBERT

Superseding Case Information:

Court Division: (Select One)

Miami Key West
 FTL WPB FTP

New Defendant(s) Yes No
Number of New Defendants _____
Total number of counts _____

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.

2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.

3. Interpreter: (Yes or No) No
List language and/or dialect _____

4. This case will take 5 days for the parties to try.

5. Please check appropriate category and type of offense listed below:
(Check only one) (Check only one)

I	0 to 5 days	<input checked="" type="checkbox"/>	Petty	<input type="checkbox"/>
II	6 to 10 days	<input type="checkbox"/>	Minor	<input type="checkbox"/>
III	11 to 20 days	<input type="checkbox"/>	Misdem.	<input type="checkbox"/>
IV	21 to 60 days	<input type="checkbox"/>	Felony	<input checked="" type="checkbox"/>
V	61 days and over	<input type="checkbox"/>		

6. Has this case been previously filed in this District Court? (Yes or No) NO

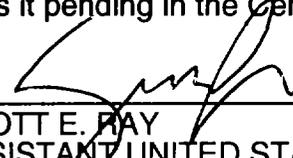
If yes:
Judge: _____ Case No. _____
(Attach copy of dispositive order)

Has a complaint been filed in this matter?(Yes or No) No

If yes:
Magistrate Case No. _____
Related Miscellaneous numbers: _____
Defendant(s) in federal custody as of _____
Defendant(s) in state custody as of _____
Rule 20 from the _____ District of _____

Is this a potential death penalty case? (Yes or No) No

7. Does this case originate from a matter pending in the U. S. Attorney's Office prior to April 1, 1999? Yes No If yes, was it pending in the Central Region? Yes No


SCOTT E. RAY
ASSISTANT UNITED STATES ATTORNEY
Florida Bar No. 802050

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
00-0131 CR-MORENO
PENALTY SHEET MAGISTRATE JUDGE
DUBÉ

Defendant Name: RONALD EPPINGER Case No. _____

Count #: I
8 USC 371

***Max. Penalty: 5 years imprisonment**

Count #: II, IV, V, VI and VII
18 USC 2422(a)

***Max. Penalty: 5 years imprisonment**

Count #: III
8 USC 1328

***Max. Penalty: 10 years imprisonment**

Count #: VIII - IX
18 USC 1956(a)(1)(A)(i) and 2

***Max. Penalty: 20 years imprisonment**

Count #: X - XI
18 USC 1957(a) and 2

***Max. Penalty 10 years imprisonment**

Count #: XII
18 USC 982(a)(1) and (a)(2)

***Max. Penalty: Forfeiture**

=====
*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

00-0131 CR-MORENO
~~PENALTY SHEET~~

MAGISTRATE JUDGE

DUBÉ

Defendant Name: LUCIE FAUBERT

Case No. _____

Count #: I

8 USC 371

*Max. Penalty: 5 years imprisonment

=====
Count #: II

8 USC 1328

*Max. Penalty: 10 years imprisonment

=====
Count #:

*Max. Penalty:

=====
Count #:

*Max. Penalty

=====
Count #:

*Max. Penalty:

=====
*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.

0031 (013) CR-MORENO

NO

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CRIMINAL DIVISION
MAGISTRATE JUDGE
DUBB

THE UNITED STATES OF AMERICA

v.s.
RONALD EPPINGER

INDICTMENT

IN VIOLATION OF

- 8 USC 1328
- 18 USC 2422(a)
- 18 USC 1957(a)
- 18 USC 2
- 18 USC 371
- 18 USC 1956(a) (1) (A) (i)
- 18 USC 982(a) (1) and (a) (2)

A true bill

98-01 (MIA)

Foreman

Filed in open court this 24 day,

of Feb. 19 AD 19-2000

Clerk

Bail, \$

GRAND JURY INDICTMENT NO. PC 9801-25