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RCK:USAO 2011R00325

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA :
 :
 v. : CRIMINAL NO. CCB-11-0239
 : (Conducting gambling business,
 K23 GROUP FINANCIAL SERVICES, : 18 U.S.C. §1955; Money
 d/b/a BMX ENTERTAINMENT, : laundering, 18 U.S.C.
 and ANN MARIE PUIG, : §1956(a)(2)(A); Aiding and
 Defendants. : abetting, 18 U.S.C. §2;
 : Forfeiture, 18 U.S.C.
 : §§982(a)(1) and 1955(d)).
 ...oOo...

INDICTMENT

COUNT ONE (Conducting gambling business)

The Grand Jury for the District of Maryland charges that:

From at least on or about November 22, 2010, through April 22, 2011, in the District of Maryland and elsewhere,

K23 GROUP FINANCIAL SERVICES,
d/b/a BMX ENTERTAINMENT,
and ANN MARIE PUIG,

did knowingly and unlawfully conduct, finance, manage, supervise, direct, and own all or part of an illegal gambling business, to wit, a gambling business involving online sportsbetting, which gambling business was in violation of the laws of the State of Maryland, to wit, Maryland Criminal Code Section 12-102, and which involved five or more persons who conducted, financed, managed, supervised, directed, and owned all or part of said illegal gambling business, and which has remained in substantially continuous operation for a period in excess of thirty days.

18 U.S.C. §§1955 and 2.

COUNT TWO (Money laundering)

The Grand Jury for the District of Maryland also charges that:

On or about March 10, 2011, in the District of Maryland and elsewhere,

**K23 GROUP FINANCIAL SERVICES,
d/b/a BMX ENTERTAINMENT,
and ANN MARIE PUIG,**

did transport, transmit, and transfer funds, that is \$7,749.26, from a place in the United States, that is a bank located in Guam, to and through a place outside the United States, that is a K23 account at Jasmin Services Corporation located in Tortola, British Virgin Islands, and those funds were moved from financial institutions located in Maryland and elsewhere to the bank located in Guam and then out of the United States at the direction of the defendants, with the intent to promote the carrying on of specified unlawful activity, that is conducting an illegal gambling business in violation of Title 18 United States Code Section 1955.

18 U.S.C. §§1956(a)(2)(A) and 2.

FORFEITURE ALLEGATIONS

~~1.~~ As a result of the offense set forth in Count One, the defendants,

K23 GROUP FINANCIAL SERVICES,
d/b/a BMX ENTERTAINMENT,
and ANN MARIE PUIG,

shall jointly and severally forfeit to the United States any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of that offense, and all property traceable to such property, and all interest and proceeds traceable thereto.

2. As a result of the offense set forth in Count Two, the defendants,

K23 GROUP FINANCIAL SERVICES,
d/b/a BMX ENTERTAINMENT,
and ANN MARIE PUIG,

shall forfeit to the United States any and all property involved in that offense, and property traceable to such property, and all interest and proceeds traceable thereto.

18 U.S.C. section 1955(d)

18 U.S.C. section 982(a) (1)

28 U.S.C. section 2461(c)

18 U.S.C. section 981(a) (1) (C)

18 U.S.C. section 1956(c) (7)

18 U.S.C. section 1961(1)

SUBSTITUTE ASSETS

3. If any of the property described in paragraphs 1 and 2 above as being subject to forfeiture, as a result of any act or omission of the defendants,

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- 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 subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property charged with forfeiture in paragraphs 1 and 2 above,

Rod J. Rosenstein
United States Attorney

A TRUE BILL:

Foreperson
Date: _____