

FILED

JUN 28 2007

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

U. S. DISTRICT COURT
E. DISTRICT OF MO.

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. S1-4:06CR00337 CEJ (MLM)
)	
BETONSPORTS PLC, its predecessors,)	18 U.S.C. § 1962(d) - Racketeering
holding companies, subsidiaries and associated)	Conspiracy [Count 1, pp. 1-17]
entities; GARY STEPHEN KAPLAN, also)	18 U.S.C. § 1341 - Mail Fraud
known as Greg Champion; NEIL SCOTT)	[Count 2, p. 18]
KAPLAN, also known as Scott Kaye; LORI)	18 U.S.C. § 1084 - Transmission of
BETH KAPLAN MULTZ, also known as Beth;)	Wagers/Wagering Information
DAVID CARRUTHERS; GREGARY JAMES)	[Counts 3-12, pp. 18-19]
HAGGARD, also known as Peter Wilson;)	18 U.S.C. § 1953 - Interstate
NORMAN STEINBERG, also known as Tom)	Transportation of Gambling Para.
Miller and David Norman; TIM BROWN, also)	[Count 13, p. 20]
known as Matt Brown; PENELOPE ANN)	18 U.S.C. § 2 - Aiding and Abetting
TUCKER, also known as Penny Tucker;)	26 U.S.C. § 7201 - Tax Evasion
DIRECT MAIL EXPERTISE, INC.; DME)	[Counts 14-16, p. 20-22]
GLOBAL MARKETING & FULFILLMENT,)	26 U.S.C. § 7212(a) - Interference
INC.; MOBILE PROMOTIONS, INC.;)	with Administration of Internal
WILLIAM HERNAN LENIS; WILLIAM)	Revenue Laws [Counts 17-22, pp. 23-
LUIS LENIS; MANNY GUSTAVO LENIS,)	24]
and MONICA LENIS,)	Forfeiture pursuant to: 18 U.S.C. §
Defendants.)	1963 [Forfeiture Count, pp. 24-27]

SUPERCEDING INDICTMENT

The Grand Jury charges that:

COUNT 1
(Racketeering Conspiracy)

At all times material to this Indictment, in the Eastern District of Missouri and elsewhere:

Introduction

1. Beginning in approximately 1992, defendant GARY STEPHEN KAPLAN (hereafter “GARY KAPLAN”) and others operated an illegal sports betting business in and near New York City. After GARY KAPLAN’s arrest on New York State gambling charges in May of 1993, GARY KAPLAN relocated his illegal gambling operation to Florida, continuing to take sports wagers from bettors in New York by telephone. In approximately 1995, GARY KAPLAN moved the illegal gambling business to Aruba, in the West Indies, but continued to operate primarily in the United States. To facilitate its U.S. operations, the gambling businesses established and controlled toll-free telephone services and Internet web sites, and caused these services to accept sports wagers from gamblers in the United States. In about 1996-1997, GARY KAPLAN relocated the gambling operations to Antigua, and then to Costa Rica, leaving certain aspects of the financial operations in Antigua. Through all these relocations, GARY KAPLAN and the other defendants always operated, and caused the operation of their primary revenue-producing business, illegal sports wagering, in the United States.

2. Among the first Internet gambling businesses operated by GARY KAPLAN was a computer-based sports book called the North American Sports Association International, or NASA International, which evolved into BETonSPORTS.COM. GARY KAPLAN and the other defendants advertised BETonSPORTS.COM as the largest online wagering service in the world. BETonSPORTS.COM and the other gambling web sites operated by GARY KAPLAN and his co-defendants offered gamblers in the United States illegal wagering on professional and college football and basketball, as well as many other professional and amateur sporting events and contests. These Internet gambling web sites also advertised toll free telephone numbers for placing sports bets.

3. In July of 2004, BETONSPORTS PLC, a holding company, was incorporated under the laws of England and the United Kingdom. Defendant GARY KAPLAN, through a holding company called Boulder Overseas, retained approximately 44% of the BETONSPORTS PLC stock. In July of 2005, defendant GARY KAPLAN sold and caused the sale of 23,000,000 shares of BETONSPORTS PLC, retaining ownership of approximately 15% of the BETONSPORTS PLC stock through Boulder Overseas.

The Defendants

4. Defendant GARY KAPLAN, also known as “Greg Champion” and “G,” was the founder and primary operator of BETonSPORTS.COM and other Internet and telephone sports betting businesses.

5. Defendant NEIL SCOTT KAPLAN (hereafter “NEIL KAPLAN”), also known as “Scott Kaye,” is defendant GARY KAPLAN’S brother. NEIL KAPLAN was an agent and/or employee of BETonSPORTS.COM, and, among other things, handled purchasing of goods and services.

6. Defendant LORI BETH KAPLAN MULTZ (hereafter “LORI KAPLAN MULTZ”), also known as “Beth,” and “Beth Wilson,” is GARY KAPLAN’S sister. LORI KAPLAN MULTZ was an employee and/or agent of BETonSPORTS.COM, who, among other things, arranged for advertising of the gambling web sites and telephone services.

7. Defendant DAVID CARRUTHERS was the Chief Executive Officer of BETonSPORTS.COM, and a Director of BETONSPORTS PLC.

8. Defendant GREGARY JAMES HAGGARD, also known as “Peter Wilson,” was the Media Director for BETonSPORTS.COM.

9. Defendant NORMAN STEINBERG, also known as “Tom Miller” and “David Norman,” owned and operated, with defendant GARY KAPLAN, a number of Internet and telephone service gambling web sites, collectively known as the Millennium Group.

10. Defendant TIM BROWN, also known as “Matt Brown,” is NORMAN STEINBERG’s son-in-law, and, among other things, was an employee and/or agent of the Internet gambling web sites in the Millennium Group.

11. Defendants MOBILE PROMOTIONS, INC., DIRECT MAIL EXPERTISE, INC., and DME GLOBAL MARKETING & FULFILLMENT (referred to in a group as “the Lenis Companies”), were all Florida corporations, which operated cooperatively and shared use of bank accounts and financing. These companies provided promotional services to the illegal gambling web sites and telephone services operated by GARY KAPLAN and the other defendants.

12. Defendant WILLIAM HERNAN LENIS was an owner, officer and operator of the Lenis Companies.

13. Defendant WILLIAM LUIS LENIS is the son of WILLIAM HERNAN LENIS, and was an officer and operator of the Lenis Companies.

14. Defendant MONICA LENIS is the daughter of WILLIAM HERNAN LENIS, and was an officer and operator of the Lenis Companies.

15. Defendant MANNY GUSTAVO LENIS is the nephew of WILLIAM HERNAN LENIS, and was an employee of the Lenis Companies.

16. Defendant PENELOPE ANN TUCKER, also known as “Penny Tucker,” was an employee and/or agent of defendant GARY KAPLAN and the GAMBLING ENTERPRISE, and a principal in several corporations that were part of the GAMBLING ENTERPRISE, which is described hereafter.

17. Defendant BETONSPORTS PLC is a publicly owned and traded holding company. BETONSPORTS PLC owned and operated BETonSPORTS.COM and other Internet and telephone sports gambling businesses operated illegally in the United States.

The Enterprise

18. At least as early as 1992, and through the date of the filing of this Superseding Indictment, defendants GARY KAPLAN, NEIL KAPLAN, LORI KAPLAN MULTZ, DAVID CARRUTHERS, GREGARY JAMES HAGGARD, NORMAN STEINBERG, TIM BROWN, WILLIAM HERNAN LENIS, WILLIAM LUIS LENIS, MONICA LENIS, PENELOPE ANN TUCKER, MANNY GUSTAVO LENIS, BETONSPORTS PLC, DIRECT MAIL EXPERTISE, INC., DME GLOBAL MARKETING FULFILLMENT & DISTRIBUTION, INC., MOBILE PROMOTIONS, INC. and others, known and unknown, constituted an “enterprise” (hereafter referred to as the “GAMBLING ENTERPRISE,” or the “ENTERPRISE”), as defined by Title 18, United States Code, § 1961(4); that is, a group of entities and individuals associated in fact. The GAMBLING ENTERPRISE constituted an ongoing organization, whose members functioned as a continuing unit, for the common purpose of achieving the objectives of the ENTERPRISE. The ENTERPRISE was engaged in, and its activities affected, interstate and foreign commerce.

19. The GAMBLING ENTERPRISE operated a number of Internet web sites, hosted on servers located outside the United States, that did business in the United States by, among other things, offering, facilitating and conducting unlawful computer and telephone service based sports betting, and other forms of gambling. The GAMBLING ENTERPRISE caused the operation of toll-free telephone services to facilitate sports gambling, and take sports bets. The GAMBLING ENTERPRISE created and disseminated false and fraudulent advertising for its Internet gambling businesses throughout the United States.

20. In addition to the named defendants, members, associates and facilities of the GAMBLING ENTERPRISE included legal entities incorporated in the United States and other countries around the world. Some of these entities provided services to or otherwise supported the ENTERPRISE. The ENTERPRISE owned and controlled or had contractual rights entitling it to control domain names used to identify web sites that provided illegal gambling in the United States, or otherwise aided and abetted the ENTERPRISE's operations. These include:

- (a) Legal entities that operated as fronts for or supporters of the ENTERPRISE, and entities whose funding and services benefitted the ENTERPRISE's goals, including, but not limited to: BetonSports (Panama) S.A.; BetonSports (Costa Rica) S.A.; BetonSports (Antigua) Ltd. S.A.; BetonSports.com Ltd.; NASA International, Inc.; NASA Sports Book, Inc.; Millennium Sports; Mill Sports; Inversiones Millennium I y M S.A.; Corporacion Moishe; B. Holdings, Inc.; Boulder Investment; Brentail Internacional S.A.; J.S.I. Jaguar Sports International S.A.; Fergrant International S.A.; Lansford Inc.; Sports on the Internet, Ltd.; Gibraltar Sports Corp.; Infinity Sports International Corp.; Rock Island, Inc.; Bettors Trust; Best Line Sports; MVP; I Q Ludorum; Domain Choices; the International Sportsbook Council (ISBC) and the Offshore Gaming Association (OSGA).
- (b) Corporate entities owned and/or controlled by ENTERPRISE members, including, but not limited to; World Wide Credit; Barrio Holdings; Iguana Azul S.A.; Insiders Publishing; and Boulder Overseas.

- (c) Entities operated under Internet-associated brand or trade names belonging to or controlled by ENTERPRISE members, including, but not limited to:
BETonSPORTS.COM (also known as BetonSports, BetonSports.com and BoS.com);
BoS; Bestline Sports International; betmill.com; BetonFantasy.com;
BetonSports.com; Bettorstrust.com; Blue Grass Sports; Gibraltar Sports; Infinity Sports International; Jagbet.com; MVP Bets.com; Millennium Sports; NASA International Sportsbook; Rock Island Sports; and Wagermall.com.
- (d) Domain names currently and formerly used to operate web sites owned and controlled by ENTERPRISE members, or otherwise used by or related to the ENTERPRISE, including but not limited to, those listed in Attachment A, and herein incorporated by reference.

21. A principal goal of the GAMBLING ENTERPRISE was to make money for the ENTERPRISE, its employees, members and associates, by maximizing the number of individuals in the United States who opened wagering accounts and used those accounts to place illegal bets on sports and sporting events with ENTERPRISE-controlled telephone service and Internet gambling web sites. It was also a goal of the ENTERPRISE to make money by maximizing the number of individuals residing in the United States who opened wagering accounts and gambled on casino-type games offered on ENTERPRISE-controlled Internet web sites.

22. Another goal of the GAMBLING ENTERPRISE was to evade the payment of federal wagering excise taxes due to the United States from any employee, member and/or associate of the ENTERPRISE.

The Racketeering Conspiracy

23. Beginning no later than 1992 and continuing to the present, within the Eastern District of Missouri and elsewhere, defendants

GARY STEPHEN KAPLAN, also known as “Greg Champion;”
NEIL SCOTT KAPLAN, also known as “Scott Kaye;”
LORI BETH KAPLAN MULTZ, also known as “Beth;”
DAVID CARRUTHERS;
GREGARY JAMES HAGGARD, also known as “Peter Wilson;”
NORMAN STEINBERG, also known as “Tom Miller” and “David Norman;”
TIM BROWN, also known as “Matt Brown;”
WILLIAM HERNAN LENIS, also known as “Bill Lenis;”
WILLIAM LUIS LENIS, also known as “Will Lenis;”
MANNY GUSTAVO LENIS;
MONICA LENIS;
PENELOPE ANN TUCKER, also known as “Penny Tucker;”
BETONSPORTS PLC, its predecessors, holding companies, and associated entities,
DIRECT MAIL EXPERTISE, a Florida corporation, its predecessors and successors;
DME GLOBAL MARKETING & FULFILLMENT, INC., a Florida corporation,
its predecessors and successors;
MOBILE PROMOTIONS, INC., a Florida corporation, its predecessors and successors,

together with other persons known and unknown, being persons employed by and associated with the GAMBLING ENTERPRISE, which engaged in, and the activities of which affected, interstate and foreign commerce, knowingly and intentionally conspired to violate Title 18, United States Code, § 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the ENTERPRISE through a pattern of racketeering activity consisting of multiple acts in violation of statutes in Missouri [Mo. Rev. Stat. §§ 572.020 and 572.030]; Florida [Fla. Stat. ch. 849.25]; New York [N.Y.Gen. Oblig. § 5-401 and N.Y. Penal § 225.10]; New Jersey [N.J. Stat. Ann. §2C:37-2]; Washington [Wash. Rev. Code §§ 9.46.220 to 221; and 9.46.180] and Illinois [720 Ill. Comp. Stat. 5/28-1.1], and multiple acts indictable under:

- (a) 18 U.S.C. § 1084 (the Wire Wager Act);
- (b) 18 U.S.C. § 1341 (Mail Fraud);
- (c) 18 U.S.C. § 1343 (Wire Fraud);
- (d) 18 U.S.C. § 1952 (Interstate travel in aid of a Racketeering Enterprise);
- (e) 18 U.S.C. § 1955 (Operation of an Illegal Gambling Business);
- (f) 18 U.S.C. § 1953 (Interstate transportation of Gambling Paraphernalia); and
- (g) 18 U.S.C. § 1956 (Money Laundering).

24. It was part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the ENTERPRISE.

Manner, Method and Means of the Racketeering Conspiracy

25. It was part of the conspiracy that the ENTERPRISE operated Internet web site and telephone gambling services from facilities physically located in San Jose, Costa Rica. The ENTERPRISE took wagers almost exclusively from gamblers in the United States. BETonSPORTS.COM promotional media materials, prepared and distributed by the ENTERPRISE, stated that in 2003, BETonSPORTS.COM had 100,000 active players, who placed 33 million wagers, worth over \$1.6 billion dollars through the BETonSPORTS.COM web site. BETonSPORTS.COM promotional media materials prepared and distributed by the ENTERPRISE stated that in 2004, BETonSPORTS.COM had more than 2,000 inbound telephone lines, computer servers capable of handling 5,600 simultaneous web transactions, and more than 2,000 employees during peak gambling times such as the months preceding the Super Bowl and March Madness. BETonSPORTS.COM promotional media materials publicly

available in 2004 and 2005 stated that BETonSPORTS.COM had a state-of-the-art network infrastructure, and offered Internet and telephone service gambling through sportsbooks, an online casino, and “proposition” bets. BETonSPORTS.COM promotional media materials available in 2004 and 2005 stated that the web site took in an average of 63 bets per minute, “24/7/52,” 98 percent of which came from bettors in the United States. All wagering originating in the United States which occurred on ENTERPRISE web sites and telephone services was illegal under federal law.

26. It was part of the conspiracy that in order to increase traffic and wagering on ENTERPRISE web sites and telephone services, the GAMBLING ENTERPRISE targeted U.S. gamblers, even though soliciting and accepting bets placed on sports and sporting events using interstate wire communications facilities was and is illegal in the United States, except where specifically authorized by federal law. The ENTERPRISE spent millions of dollars in the United States, advertising ENTERPRISE-controlled Internet web sites and telephone services in magazines, sports annuals and other sports publications, on sports radio, and on television.

27. It was part of the conspiracy that the GAMBLING ENTERPRISE operated various illegal gambling businesses. The ENTERPRISE conducted illegal Internet and telephone gambling operations throughout the United States, in violation of the laws of the United States. The GAMBLING ENTERPRISE solicited millions of illegal bets on sports and sporting events from gamblers in the United States, twenty four hours a day, three hundred and sixty five days a year. These bets, and information related to illegal bets placed with the GAMBLING ENTERPRISE-controlled entities, were transmitted via interstate and international telephone lines, and computers connected to the Internet.

28. It was part of the conspiracy to develop a scheme to defraud gamblers in the United States, by inviting, inducing and persuading them to place bets with the GAMBLING ENTERPRISE through its various Internet web sites and telephone lines. As part of the scheme, the members and associates of the GAMBLING ENTERPRISE created and disseminated advertising throughout the United States, which falsely stated that Internet and telephone gambling on sporting events and contests was “legal and licensed.” The GAMBLING ENTERPRISE concealed the fact that the multiple web sites and telephone services through which it offered sports and casino style gambling were all owned and operated by the ENTERPRISE, and used to conduct the ENTERPRISE’s illegal gambling businesses that were in fact not legal or licensed in the United States.

29. As part of the scheme to defraud, the GAMBLING ENTERPRISE used the United States mail system to deliver its fraudulent print advertising, and to cause bettors in the United States to send money to ENTERPRISE-controlled entities for the purpose of placing illegal bets. The GAMBLING ENTERPRISE used radio and television to deliver fraudulent advertising, through broadcasts and cable casts in and across the United States.

30. As part of the scheme to defraud, the GAMBLING ENTERPRISE controlled, in whole or in part, two entities called the Offshore Gaming Association (“OSGA”) and the International Sportsbook Council (“ISBC”). The OSGA and the ISBC were advertised and represented to gamblers in the United States as independent watchdog agencies, whose purpose was to monitor online gambling to protect the wagering public. The ENTERPRISE actually used the OSGA and ISBC web sites to direct U.S. gamblers to ENTERPRISE-controlled web and telephone gambling sites, and to inhibit loss of funds to the ENTERPRISE that might otherwise occur due to customer complaints or disputes.

31. It was part of the scheme to defraud and the conspiracy that the members and agents of the GAMBLING ENTERPRISE instructed individuals in the United States to send, or cause money to be sent to the ENTERPRISE, for the purpose of opening one or more gambling accounts. The ENTERPRISE instructed these individuals to send the money, intended to be used to place illegal wagers, to a named recipient other than directly to the ENTERPRISE web site or telephone line.

32. Another part of the conspiracy was to have the members and associates of the GAMBLING ENTERPRISE use interstate and international telephone and computer wire communications to illegally accept and record millions of sports wagers from gamblers in the United States, and to transmit information facilitating the acceptance of illegal wagers by GAMBLING ENTERPRISE web sites and gambling telephone services.

33. It was also part of the conspiracy that members and associates of the GAMBLING ENTERPRISE traveled and communicated across State and national borders, in aid of the ENTERPRISE and its operations, and purchased products and services in the United States, and caused them to be shipped to Costa Rica, and other locations outside the U.S. where the ENTERPRISE had physical facilities.

34. It was also part of the conspiracy that the members and associates of the GAMBLING ENTERPRISE transported gambling equipment across State and national borders, in aid of the ENTERPRISE and its operations.

35. Another component of the conspiracy was to have the members and associates of the GAMBLING ENTERPRISE launder money received by the ENTERPRISE in the form of illegal wagering funds, wagers and fees.

36. It was part of the conspiracy that the ENTERPRISE, its members and associates, used the U.S. and private mail services and wire transfer services to send money from ENTERPRISE components outside the United States to various recipients in the United States, and from the United States to recipients outside the United States, and between locations in the United States, in order to promote the ENTERPRISE's illegal telephone and Internet gambling operations.

Overt Acts

37. In furtherance of the conspiracy, and to accomplish the objects of the conspiracy, the defendants and their co-conspirators, committed, among others, the following acts within the Eastern District of Missouri and elsewhere:

(1) On or about December 4, 2001, corporate documents dated in July 2001, for an entity called "NASA International" and listing defendant PENELOPE ANN TUCKER as a "Managing Director" of the entity were submitted to a payment processing firm.

(2) On or about January 31, 2002, the GAMBLING ENTERPRISE operated a telephone service and Internet gambling web site called Millennium Sportsbook, and transmitted to potential and actual bettors in the Eastern District of Missouri, instructions for opening a wagering account with Millennium Sportsbook. The instructions stated that the money was to be sent from the United States to "Rod Jones" in Ecuador.

(3) On or about February 6, 2002, the GAMBLING ENTERPRISE operated a telephone service and Internet gambling web site called Gibraltar Sportsbook, and transmitted to potential and actual bettors in the Eastern District of Missouri, instructions for opening a wagering account with Gibraltar Sportsbook. The instructions stated that the money was to be sent from the United States to "Thomas Navas" in Ecuador.

(4) On or about February 12, 2002, the GAMBLING ENTERPRISE operated a telephone service and Internet gambling web site called NASA, and transmitted to potential and actual bettors in the Eastern District of Missouri, instructions for opening a wagering account with NASA International. The instructions stated that the money was to be sent from the United States to "David Allen" in Belize.

(5) On or about March 8, 2002, the GAMBLING ENTERPRISE operated a telephone service and Internet gambling web site called Gibraltar Sports, and transmitted to potential and actual bettors in the Eastern District of Missouri, instructions for opening a wagering account with Gibraltar Sports. The instructions stated that the money was to be sent from the United States to "Jerry Moore" in Ecuador.

(6) On or about March 8, 2002, the GAMBLING ENTERPRISE operated a telephone service and Internet gambling web site called Millennium, and transmitted to potential and actual bettors in the Eastern District of Missouri, instructions for opening a wagering account with Millennium. The instructions stated that the money was to be sent from the United States to "Kevin Green" in Ecuador.

(7) On or about March 12, 2002, the GAMBLING ENTERPRISE operated a telephone service and Internet gambling web site called Millennium Sportsbook, and transmitted to potential and actual bettors in the Eastern District of Missouri, instructions for opening a wagering account with Millennium. The instructions stated that the money was to be sent from the United States to "Paul Rogers" in Ecuador.

(8) On or about March 13, 2002, the GAMBLING ENTERPRISE operated a telephone service and Internet gambling web site called Millennium Sports, and accepted an account

inquiry via a telephone and Internet communication to an ENTERPRISE controlled Internet web site with the domain name of bet.wagermillennium.com.

(9) On or about April 25, 2002, the GAMBLING ENTERPRISE operated a telephone service and Internet gambling web site called Gibraltar Sports, and accepted a sports wager via a telephone and Internet communication to an ENTERPRISE-controlled Internet web site with the domain name of bettherock.com.

(10) On or about April 25, 2002, the GAMBLING ENTERPRISE operated a telephone service and Internet gambling web site called Millennium Sports, and accepted a sports bet via a telephone and Internet communication to an ENTERPRISE-controlled Internet web site with the domain name of millsports.com.

(11) On or about June 12, 2002, the GAMBLING ENTERPRISE operated a telephone service and Internet gambling web site called Millennium Sports, and accepted a request via telephone to withdraw money from a wagering account held by the GAMBLING ENTERPRISE.

(12) Between September 1 and October 30, 2003, the GAMBLING ENTERPRISE mailed from an address in Miami, Florida, to 12430 Tesson Ferry Road, St. Louis, Missouri, brochures, magazines, coupons and flyers.

(13) Between August 2002 and September 2003, the GAMBLING ENTERPRISE caused fraudulent radio advertisements to be broadcast by radio stations across the country.

(14) Between October 2001 and January 2002, the GAMBLING ENTERPRISE arranged for the telecast of a fraudulent television advertisement stating that its gambling telephone services and web sites were "legal and licensed."

(15) Between 2001 and the date of this Indictment, the GAMBLING ENTERPRISE transported and caused the transportation of gambling paraphernalia across state boundaries, and used the equipment to induce individuals to open betting accounts with various ENTERPRISE-controlled Internet sports gambling web sites.

(16) On or about November 24, 2003, defendant David Carruthers traveled to New York City, and met with employees of a media relations firm used by the ENTERPRISE to promote its operations.

(17) On or about February 20, 2004, employees, owners or agents of the Lenis Group of companies and employees and agents of the ENTERPRISE arranged for the shipment, from Miami, Florida to Costa Rica, of two automobiles, purchased with funds provided by the GAMBLING ENTERPRISE, for use by the ENTERPRISE.

(18) On or about September 6, 2000, the GAMBLING ENTERPRISE caused a check in the amount of \$99,620.00 to be made out by American Media Communications, payable to One-on-One Sports, for the purchase of advertising for ENTERPRISE-controlled Internet gambling web sites on radio broadcasts.

(19) On or about December 11, 2000, the GAMBLING ENTERPRISE caused a check in the amount of \$100,000 to be sent to Standard Register Company, to purchase services related to direct mail advertising of ENTERPRISE-controlled Internet gambling web sites.

(20) On or about April 11, 2001, the GAMBLING ENTERPRISE caused a check in the amount of \$109,903.39 to be sent to Standard Register Company, to purchase services related to direct mail advertising of ENTERPRISE-controlled Internet gambling web sites.

(21) On or about September 2, 2003, the GAMBLING ENTERPRISE caused \$90,000.00 to be sent from a bank located outside the United States via a wire transfer, to a bank account controlled by defendant DME GLOBAL located in Florida, to purchase advertising/promotional services on behalf of ENTERPRISE-controlled Internet gambling web sites.

(22) On or about August 4, 2004, the GAMBLING ENTERPRISE caused \$61,962.00 to be sent from a bank located outside the United States via a wire transfer, to a bank account controlled by defendant DME GLOBAL located in Florida, to purchase advertising/promotional services on behalf of ENTERPRISE-controlled Internet gambling web sites.

(23) On or about December 28, 2005, BETONSPORTS PLC purchased three online sports books; MVPSportsbook, Player Super Book and V-Wager.

(24) On or about April 12, 2006, BETONSPORTS PLC-owned web site BETonSPORTS.COM solicited and accepted wagers from an individual residing in the State of Washington, in violation of that State's laws.

(25) On or about January 22, 2007, defendant PENELOPE ANN TUCKER, also known as "Penny Tucker," arranged for the transfer of funds from a bank account she controlled on behalf of defendant GARY KAPLAN to pay for registration of a company controlled by defendant GARY KAPLAN.

All in violation of Title 18, United States Code, § 1962(d).

COUNT 2

(Scheme to Defraud - Mail)

38. The Grand Jury re-alleges paragraphs 26, 28 and 29 above, and further charges that on or about September 1 to October 30, 2003, in the Eastern District of Missouri and elsewhere, defendants BETONSPORTS PLC and DME GLOBAL MARKETING AND FULFILLMENT, INC, for the purpose of executing and attempting to execute the scheme to defraud, did knowingly cause to be delivered by mail, from Miami, Florida, to 12430 Tesson Ferry Road, St. Louis, Missouri, brochures, magazines, coupons and flyers, all in violation of Title 18, United States Code, §§ 1341 and 2.

COUNTS 3 to 12

(Use of a Communications Facility to Transmit Bets and Betting Information)

39. The Grand Jury re-alleges paragraphs 19, 27 and 32 above, and further charges that, on or about the dates listed below, in the Eastern District of Missouri and elsewhere, defendants GARY KAPLAN and NORMAN STEINBERG, and others known and unknown, being engaged in the business of betting and wagering, did knowingly use and cause the use of a wire communication facility, for the transmission in interstate and foreign commerce, between the State of Missouri and the country of Costa Rica, wagers on sporting events and contests, information assisting in the placing of bets and wagers on sporting events and contests, and a wire communication which entitled the recipient to receive money and credit as a result of bets and wagers, and information assisting in the placing of bets and wagers, in violation of Title 18, United States Code, §§ 1084 and 2.

Count	Date	Recipient	Defendant(s)	Communication
3	Jan 31, 2002	Millennium Sportsbook	GARY KAPLAN & NORMAN STEINBERG	Call to 800-824-1637 transmitted instructions on opening a wagering account and instructions to send money to "Rod Jones" in Ecuador.
4	Feb. 6, 2002	Gibraltar Sportsbook	GARY KAPLAN & NORMAN STEINBERG	Call to 800-582-1381 transmitted instructions on opening a wagering account and instructions to send money to "Thomas Navas" in Ecuador.
5	Feb. 12, 2002	NASA International	GARY KAPLAN	Call to 888-999-9238 transmitted instructions on opening a wagering account and instructions to send money to "David Allen" in Belize.
6	Mar. 8, 2002	Gibraltar Sports	GARY KAPLAN & NORMAN STEINBERG	Call to 800-582-1381 confirmed instructions to send money to "Jerry Moore" in Ecuador.
7	Mar. 8, 2002	Millennium	GARY KAPLAN & NORMAN STEINBERG	Call to 800-824-1637 transmitted instructions to send money to "Kevin Green" in Ecuador.
8	Mar. 12, 2002	Millennium Sportsbook	GARY KAPLAN & NORMAN STEINBERG	Call to 800-593-2915 transmitted instructions to send money to "Paul Rogers" in Ecuador.
9	Mar. 13, 2002	Millennium Sports	GARY KAPLAN & NORMAN STEINBERG	Internet communication to bet.wagemillennium.com confirmed account balance.
10	April 25, 2002	Gibraltar Sports	GARY KAPLAN & NORMAN STEINBERG	Internet communication to bettherock.com transmitted a bet.
11	April 25, 2002	Millennium Sports	GARY KAPLAN & NORMAN STEINBERG	Internet communication to millsports.com transmitted a bet.
12	June 12, 2002	Millennium Sports	GARY KAPLAN & NORMAN STEINBERG	Call to 800-824-1637 requested withdrawal of money from wagering account.

COUNT 13

(Interstate Transportation of Gambling Paraphernalia)

40. The Grand Jury re-alleges paragraph 34 above, and further charges that on or about October 20, 2002, in the Eastern District of Missouri and elsewhere, defendants GARY KAPLAN, WILLIAM HERNAN LENIS, MONICA LENIS, MOBILE PROMOTIONS, INC. and others known and unknown, knowingly did carry and send in interstate commerce, from the State of Florida to the State of Missouri, laptop computers and software, used, and to be used and adapted, devised and designed for use in bookmaking, all in violation of Title 18, United States Code, §§ 1953 and 2.

COUNT 14

(Tax Evasion)

41. The Grand Jury further charges that, in the Eastern District of Missouri and elsewhere:

During the time period from on or about January 29, 2001 to on or about February 3, 2002, BETonSPORTS.COM, BetonSports (Antigua), Millennium, Jaguar, Infinity, and Gibraltar, entities doing business in the United States, had and received taxable wagers in the sum of approximately \$1,094,669,000.00; and defendant GARY KAPLAN, who owned and controlled BETonSPORTS.COM, BetonSports (Antigua), Millennium, Jaguar, Infinity, and Gibraltar, well-knowing and believing the foregoing facts, did willfully attempt to evade and defeat the said wagering excise tax due and owing by GARY KAPLAN, as the owner and operator of BETonSPORTS.COM, BetonSports (Antigua), Millennium, Jaguar, Infinity, and Gibraltar, to the United States of America for said time period, by failing to make any wagering excise tax returns on or before the last day of the month following the month the wagers were accepted, as required

by law, to any proper officer of the Internal Revenue Service, by failing to pay to the Internal Revenue Service said wagering excise tax, and by directing that the wagering funds be sent outside the United States, all in violation of Title 26, United States Code, Section 7201, and Title 18, United States Code, Section 2.

COUNT 15
(Tax Evasion)

42. The Grand Jury further charges that, in the Eastern District of Missouri, and elsewhere:

During the time period from on or about February 4, 2002 to on or about February 2, 2003, BETonSPORTS.COM, BetonSports (Antigua), Jaguar, MVP, Millennium, Gibraltar, Infinity and Wagermall, entities doing business in the United States, had and received taxable wagers in the sum of approximately \$1,228,874,000.00; and defendant GARY KAPLAN, who owned and controlled BETonSPORTS.COM, BetonSports (Antigua), Jaguar, MVP, Millennium, Gibraltar, Infinity and Wagermall, well-knowing and believing the foregoing facts, did willfully attempt to evade and defeat the said wagering excise tax due and owing by GARY KAPLAN as the owner and operator of BETonSPORTS.COM, BetonSports (Antigua), Jaguar, MVP, Millennium, Gibraltar, Infinity and Wagermall to the United States of America for said time period, by failing to make a wagering excise tax return on or before the last day of the month following the month wagers were accepted, as required by law, to any proper officer of the Internal Revenue Service, by failing to pay to the Internal Revenue Service said wagering excise tax, and by causing and directing that the wagering funds be sent outside the United States, all in violation of Title 26, United States Code, Section 7201, and Title 18, United States Code, Section 2.

COUNT 16
(Tax Evasion)

43. The Grand Jury further charges that, in the Eastern District of Missouri, and elsewhere:

During the time period from on or about February 3, 2003 to on or about February 1, 2004, BETonSPORTS.COM, BetonSports (Antigua), Bettorstrust, Rockisland, Jaguar, MVP, Millennium, Gibraltar, Infinity and Wagermall, entities doing business in the United States, had and received taxable wagers in the sum of approximately \$1,235,374,000.00; and defendant GARY KAPLAN, who owned and controlled BETonSPORTS.COM, BetonSports (Antigua), Bettorstrust, Rockisland, Jaguar, MVP, Millennium, Gibraltar, Infinity and Wagermall, well-knowing and believing the foregoing facts, did willfully attempt to evade and defeat the said wagering excise tax due and owing by GARY KAPLAN as the owner and operator of BETonSPORTS.COM, BetonSports (Antigua), Bettorstrust, Rockisland, Jaguar, MVP, Millennium, Gibraltar, Infinity and Wagermall to the United States of America for said time period, by failing to make wagering excise tax returns on or before the last day of the month following the month the wagers were accepted, as required by law, to any proper officer of the Internal Revenue Service, by failing to pay to the Internal Revenue Service said wagering excise tax, and by causing and directing that the wagering funds be sent outside the United States, all in violation of Title 26, United States Code, Section 7201, and Title 18, United States Code, Section 2.

COUNTS 17 to 22

(Interference With Administration of Revenue Laws)

44. On or about the dates listed below, in the Eastern District of Missouri and elsewhere, defendants GARY KAPLAN, NORMAN STEINBERG and others known and unknown, did corruptly obstruct and impede and endeavor to obstruct and impede the due administration of the internal revenue laws by directing that money for opening and funding sports wagering accounts, sent from the United States to unlawful Internet and telephone service gambling businesses located outside the United States, be directed to a third party recipient, all in violation of Title 26, United States Code, Section 7212(a), and Title 18, United States Code, Section 2, as follows:

COUNT 17 - January 31, 2002, Millennium Sportsbook employees gave instructions to an individual in the United States to send money to “Rod Jones” in Ecuador.

COUNT 18 - February 6, 2002, Gibraltar Sportsbook employees gave instructions to an individual in the United States to send money to open a wagering account to “Thomas Navas” in Ecuador.

COUNT 19 - February 12, 2002, NASA International employees gave instructions to an individual in the United States to send money to open a wagering account to “David Allen” in Belize City.

COUNT 20 - March 8, 2002, Gibraltar Sportsbook employees gave instructions to an individual in the United States to send money to open a wagering account to “Jerry Moore” in Ecuador.

COUNT 21 - March 8, 2002, Millennium Sportsbook employees gave instructions to an individual in the United States to send money to “Kevin Green” in Quito, Ecuador.

COUNT 22 - March 12, 2002, Millennium Sportsbook employees gave instructions to an individual to send money to "Paul Rogers" in Ecuador.

RICO FORFEITURE

45. The allegations contained in Count 1 of this Indictment are hereby repeated, realleged, and incorporated by reference herein as though fully set forth at length for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 1963. Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 1963 in the event of any defendant's conviction under Count 1 of this Indictment.

46. The defendants,

GARY STEPHEN KAPLAN, also known as "Greg Champion;"
NEIL SCOTT KAPLAN, also known as "Scott Kaye;"
LORI BETH KAPLAN MULTZ, also known as "Beth;"
DAVID CARRUTHERS;
GREGARY JAMES HAGGARD, also know as "Peter Wilson;"
NORMAN STEINBERG, also known as "Tom Miller and "Dave Brown;"
TIM BROWN, also known as "Matt Brown;"
WILLIAM HERNAN LENIS, also known as "Bill Lenis";
WILLIAM LUIS LENIS, also known as "Will Lenis";
MANNY GUSTAVO LENIS;
MONICA LENIS;
PENELOPE ANN TUCKER, also known as "Penny Tucker;"
BETONSPORTS PLC, its predecessors, holding companies, and associated entities;
DIRECT MAIL EXPERTISE, a Florida corporation, its predecessors and successors;
DME GLOBAL MARKETING & FULFILLMENT, INC., a Florida corporation,
its predecessors and successors; and
MOBILE PROMOTIONS, INC., a Florida corporation, its predecessors and successors;

i. have acquired and maintained interests in violation of Title 18, United States Code, Section 1962, which interests are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(1);

ii. have an interest in, security of, claims against, and property and contractual rights which afford a source of influence over, the ENTERPRISE named and described herein which the defendants established, operated, controlled, conducted, and participated in the conduct of, in violation of Title 18, United States Code, Section 1962, which interests, securities, claims, and rights are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(2);

iii. have property constituting and derived from proceeds obtained, directly and indirectly, from racketeering activity, in violation of Title 18, United States Code, Section 1962, which property is subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(3),

47. The interests of the defendants subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(1), (a)(2), and (a)(3), include but are not limited to:

- a. at least \$4.5 billion dollars;
Recreational vehicle with VIN number 5B4MP67G023338413;
Recreational vehicle with VIN number 5B4MPA7G753410635 and Florida license tag number S53-8XW;
Recreational vehicle with VIN number 5B4MP67G323346313 and Florida license tag number U93-YNT;
Recreational vehicle with VIN number 5B4MP67G623347620 and Florida license tag number V83-KDK;
PT Cruiser with VIN number 3C8FY4BB41T586360 registered to Mobile Promotions with Florida license tag number V62-TAG;
PT Cruiser with VIN number 3C8FY4BBX1T618485, with Florida license tag V65-TAG;
Humvee with serial number 5GRGN23U54H116407;
Humvee with serial number 5GRGN23U74H120068;
Gateway laptop computer, serial number BT302200210;
Gateway laptop computer, serial number C9B99375616;
Gateway laptop computer, serial number BT502340484;
Gateway laptop computer, serial number BT502340487;
Apple laptop computer, serial number QT2063V6LYO;

Sony Vaio laptop computer, serial number 283645303109424; and Sprint cell phone assigned number 305-527-6674, forfeitable pursuant to Title 18, United States Code, Sections 1963(a)(1) and 1963(a)(3);

- b. all right, title and interest in BETONSPORTS PLC and its subsidiaries and affiliates identified in paragraph 18 of this Indictment, forfeitable as each convicted defendant's interest in the ENTERPRISE pursuant to Title 18, United States Code, Section 1963(a)(2)(A);
- c. all right, title and interest in those entities identified in paragraph 20 of this Indictment, forfeitable as each convicted defendant's interest in the ENTERPRISE pursuant to Title 18, United States Code, Section 1963(a)(2)(D);

48. If any of the property described in paragraphs (ii) and (iii) above, as a result of any act or omission of a 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;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

the court shall order the forfeiture of any other property of the defendants up to the value of any property set forth in paragraphs 46 and 47 above.

49. The above-named defendants, and each of them, are jointly and severally liable for the forfeiture obligations as alleged above.

All pursuant to Title 18, United States Code, Section 1963.

A TRUE BILL

FOREPERSON

CATHERINE L. HANAWAY
UNITED STATES ATTORNEY

MICHAEL K. FAGAN #6617
Assistant United States Attorney

MARTY WOELFLE AZ Bar #009363
Trial Attorney
Organized Crime and Racketeering Section

STEVEN A. MUCHNICK #3905
Assistant United States Attorney

EXHIBIT A

007betonsports.com
1001nightcasino.com
100bets.com
100yardssportsbettingguide.com
105juice.com
105sports.com
123sportbet.com
123sportsbets.com
1800betonsports.com
1betstreet.com
1sportsaction.com
1webbet.com
2beteurosports.com
2betnasa.com
2betthenet.com
2eurobet.com
2ranksportsbook.com
2ratesports.com
2sportingbet.com
2sportswager.com
365wager.com
60minutesports.com
60minutessports.com
8889999bet.com
8889999bets.com
888999bets.com
999bets.com
999sportsbook.com
999wager.com
afootballcontest.com
aladinsports.com
amazingplays.com
apostadme.com
apostale.com
apostame.com
apostandoenlinea.com
apostandoitv.com
apostandole.com
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apostariv.com
apostarleitv.com
apostasemesportes.com
apostasxcelular.com
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asportingbet.com
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bestplacestobet.com
bet1st.com
betabetcr.com
bet-bets.com
betbos.com
betdunyasi.com
betelite.com
betfantasyonline.com
betgg.com
betherock.com
betinfinity.com
betinfinity.net
betmvp.com
betmvp.net
bet-nfl-games.com
beton168.com
betonamericanfootball.com
betonasa.com
betonbabes.com
betonbos.com
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betonleague.com
betonleagues.com
betonlotto.com
betonmadness.com
betonmlb.net
betonmobiles.com
betonnasa.com
betonnascar.com
betonsport.net
bet-on-sports.biz
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betonsports1.com
betonsports123.com
betonsports2.com
betonsports3.com
betonsportsasia.com
betonsportsasia.net
betonsportsasiacasino.com
betonsportscasino.com
betonsportselite.com
betonsportsflash.com
betonsportsitv.com
betonsportspoker.net
betonsportsq.com
betonsportsquick.com
betonsports-taxfree.com
betonsportstf.com
betonsportswager.com
betontrack.com
betsandbabes.com
betsandgirls.com
bets-football.com
betthecards.com
betthecup.com
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bettorstrust1.com
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bettrackodds.com
betus123.com
betwithbos.com
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bet-world-cup.com
betxtreme.com
bigbolasports.com
bigtimewagering.com
bingo1st.com
bingoonitv.com
bitbets.com
bjudpasport.com
bos4fun.com
bosaffiliate.com
bosantigua.com
bosarcade.com
bosasiacasino.com
bosbaseball.com
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bosbet.com
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boshorses.com
bositv.com
bosjob.com
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boslotto.com
bosmadness.com
bosmedia.com
bosmls.com
bosnascar.com
bosnew.com
bosnfl.com
bosoccer.com
bosp2p.com
bosplay.com
bosplc.com
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bospoker.net
bospokerclub.com
bospoolbetting.com
bospools.com
bosptop.com
bosquick.com
bosracebook.com
bosretro.com
bosrugby.com
bossitv.com
bos-soccer.com
bossoccerbet.com
bossport.com
bossportsbook.com
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bostournament.com
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bosunreal.com
bosverdicts.com
bosvip.com
bosvipclub.com
bosworldsoccer.com
bosxgames.net
brasilcasino.com
bsaux.com
bsaux.net
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cabaretcasino.com
casino-168.com
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concourscoupedumonde.com
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cyberloteria.com
dailyfreebet.com
deporteapuestas.com
deportesemas.com
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deportesynoticias.net
digitalshoppers.com
domainchoices.net
epalace.com
esportingbet.com
eurobetmaker.com
eurobetmaker.net
eurosportbook.com

eurosportingbet.com
ez-shop-online.com
firstbet.us
football-bet-bets.com
football-betting-bets.com
footballbettingcontest.com
footballbettingnfl.com
freebetoffers.com
freedailybet.com
freenflpick.com
fullodds.com
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gamble168.com
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inventabet.biz
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inventabet.net
inventabet.org
inventabet.us
inventabets.com
inventanybet.com
investabet.com
iranksportbook.com
iranksportsbook.com
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isbcouncil.com
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itvkeno.com
iwager2.com
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juegapr.com
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jugandoenlinea.com
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just4bingo.com
justfreepicks.com
kakekeitai.com
kakenodoumoto.com
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ladybets.com
latinladieslive.com
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magicbet.com
magicbets.biz
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marcaevinci.com
marchmdns.com
masterbettingsite.com
maximfootball.com
mensbets.com
mensbets.net
millantigua.com
millcasino.com
milleniumsportsbook.com
millpoker.com
millsports.com
millsports.net

millsports.us
millsportsbook.com
mlblegacy.com
Monday-night-football.com
Monday-night-odds.com
Monday-night-wager.com
movilapuestas.com
mundodeapuesta.com
mundodeapuesta.net
mvpcontest.com
mvppoker.biz
mvpsuperbook.net
mybetonsports.com
mygambliworld.com
mygamblingworld.com
mynasasports.com
nasacasino.com
nasacasino.org
nasaclub.com
nasagaming.com
nasainternational.com
nasainternationalsports.com
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nasaplayers.com
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nasasportsinternational.com
nflbetsbetting.com
nflbettingbookie.com
nflbettingcontest.com
nflfootballwagering.com
nfl-game-bet.com
nflgamebetting.com
nflgameodds.com

nfllegacy.com
nfl-sportsbooks.com
nflspreadbetting.com
nfl-teams.com
nofavorites.com
noticasysteportes.com
online-nfl-bets.com
ozgaming.com
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pickfantasy.com
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pokeronitv.com
ponybook.com
puntaallosport.com
rockislandcasino.com
rockislandpoker.biz
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rockislandpoker.net
rockislandsport.com
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rockislandsports.com
rockislandsports.info
rockislandsports.net
rockislandsports.org
rockpokerclub.com
sbcouncil.com
sbcouncil.net
sitesmasters.com
sporthits.biz
sporthits.com
sporthits.info
sporthits.org
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sporthustlers.com
sportingbetonline.com
sportontheinternet.com
sportsbook-bos.com
sportsbookcouncil.com
sportsbookitv.com
sportsbooksyndicate.com
sportshit.net

sportshustle.com
sportsintl.com
sportsonitv.com
sportsontheinternet.com
sportsparier.com
squarepoker.com
stavkiporuski.com
stavkinasport.com
stavkipomobilniku.com
stavkiporuski.com
stuff-zone.com
taiyuwunton.com
teeboxgolf.com
telerihane.com
the-cyberstore.net
thehorsebookie.com
thehorsebookie.com
the-superbowl.com
ticobet.com
tobetsports.com
truesportsbook.com
unitedcardroom.com
wager123.com
wageraffiliate.com
wageraffiliates.com
wagerfantasy.com
wagering-football.com
wagering-nfl.com
wageringworldcup.com
wageritv.com
wageroninternet.com
wageronitv.com
wageronsport.com
wagerplaza.com
wager-sports.com
wagersyndicate.com
wagerwizards.com
wageryes.com
wannabetfootball.com
wannamakeawager.com
wannapunt.com
wannasportsbook.com
wannawager.com

wapwagering.com
webdomians.com
webbet2.com
webplayers.com
wedopsporten.com
weltpcupwettbewerb.com
weranksportbook.com
weranksportsbook.com
wettenmeister.com
wewager2.com
wheretwobet.com
winfantasy.com
winonlottery.com
worldbettingsite.com
worldcupbettinginc.com
worldcupbettingzone.com
worldcupkontesto.com
worldgamblingassociation.com
worldgamblingfederation.com
worldgamblingindex.com
worldgamingindex.com
worldsbestsportsbooks.com
xtremebet.com
zonajuegos.com

bestlinesports.com
playersb.com
playerssportsbook.com
players-sb.com
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v-bookmaker.net

vbookmaker.org
v-bookmaker.org
virtualbookmaker.com
virtualbookmaker.net
v-sportsbook.com
v-wager.com
v-wager.net
v-wagering.com
v-wagers.com

osga.com
youwager.com
youwager.net

800betonsports.com
apostareninternet.com
bemill.biz
bemill.com
bemill.info
bemill.net
bemill.us
betbg.com
beteurosports.com
betextreme.com
betgibraltar.biz
betgibraltar.com
betgibraltar.info
betgibraltar.us
betinfinity.biz
bet-infinity.com
betinfinity.info
betinfinity.us
betinfinitysports.biz
betinfinitysports.info
betinfinitysports.us
betjag.com
betmil.biz
betmil.com
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betmileniumsport.biz
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