

Filed by: **TB**
May 10, 2016
STEVEN M. LARIMORE
CLERK U.S. DIST. CT.
S.D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
16-20345-CR-MOORE/MCALILEY
CASE NO. _____

18 U.S.C. § 1343
18 U.S.C. § 1952(a)(3)(A)
8 U.S.C. § 1328
18 U.S.C. § 1591(a)(1)
18 U.S.C. § 1591(b)(1)
18 U.S.C. § 1594(a)
18 U.S.C. § 981(a)(1)(C)
18 U.S.C. § 1594(e)(1)

UNITED STATES OF AMERICA

vs.

JEFFREY JASON COOPER,
a/k/a “Dr. Janardana Dasa,”
a/k/a “Janardana,”
a/k/a “Jay,”

Defendant.

_____ /

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

1. The United States Department of State (DOS) is the executive department of the United States government responsible for conducting international relations and implementing the foreign policy and diplomacy efforts of the United States.

2. The DOS Summer Work Travel (SWT) program provides foreign college and university students with an opportunity to live and work in the United States during their summer vacations. Foreign students who participate in the SWT program receive a J-1 visa authorizing them to temporarily enter, live, and work in the United States. One of the purposes of the SWT program is to expose foreign college students to the people, culture, and way of life in the United

States.

3. To facilitate the administration of the SWT program, the DOS relies on designated sponsors to assist program participants with obtaining suitable employment. Sponsors also screen potential participating American employers in order to confirm the terms and conditions of all job offers to be extended to program participants. One such sponsor is Company A, a Chicago-based international educational exchange organization designated by the DOS as a J-1 SWT program sponsor.

COUNTS 1-3
Wire Fraud
(18 U.S.C. § 1343)

Paragraphs 1 through 3 of the General Allegations section of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

From on or about May 12, 2011, through on or about June 13, 2011, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

JEFFREY JASON COOPER,
a/k/a “Dr. Janardana Dasa,”
a/k/a “Janardana,”
a/k/a “Jay,”

did knowingly, and with the intent to defraud, devise, and intend to devise, a scheme and artifice to defraud and obtain money and property by means of materially false and fraudulent pretenses, representations and promises, knowing that such pretenses, representations, and promises were false and fraudulent when made, and, for the purpose of executing the scheme and artifice, did knowingly transmit and cause to be transmitted, by means of wire communication in interstate commerce, certain writings, signs, signals, pictures and sounds, in violation of Title 18, United States Code, Section 1343.

PURPOSE OF THE SCHEME AND ARTIFICE

4. It was the purpose of the scheme and artifice to defraud for the defendant, **JEFFREY JASON COOPER**, to enrich himself by making false and fraudulent representations to employees of Company A, to the DOS, to foreign nationals, and to others, in order to obtain money.

SCHEME AND ARTIFICE

The manner and means by which the defendant sought to accomplish the purpose of the scheme and artifice to defraud included, among other things, the following:

5. **JEFFREY JASON COOPER** operated a prostitution business in Miami-Dade County, and elsewhere, and posted advertisements on the Internet website Backpage directed both at potential employees and interested customers of his prostitution business.

6. **JEFFREY JASON COOPER**, a/k/a “Dr. Janardana Dasa,” purported to be the owner and director of “Janardana’s Yoga and Wellness S.A.,” a company that operated a yoga studio. **JEFFREY JASON COOPER** completed several false written job offers to recruit foreign nationals as clerical workers for the yoga studio. At all times, **JEFFREY JASON COOPER** knew that no yoga studio existed, and that foreign nationals working for him in the SWT program would not be working as clerical workers, but instead would be expected to perform erotic massages and sex acts.

7. After foreign nationals arrived in the United States from Kazakhstan, **JEFFREY JASON COOPER** revealed to the foreign nationals that, in fact, no yoga studio existed, and that the foreign nationals would be expected to perform erotic massages and sex acts in exchange for money. **JEFFREY JASON COOPER** also directed female associates to explain to the foreign nationals the details of the erotic massages and sex acts that the foreign nationals were expected to

perform.

8. In telephone communications conducted over the wires with employees of Company A, **JEFFREY JASON COOPER** falsely and fraudulently represented and maintained that he had not asked any of his SWT participants to perform massages, and that he had asked his SWT participants only to perform office work and other clerical work.

USE OF THE WIRES

9. On or about the date indicated below as to each Count, the defendant, for the purpose of executing, and in furtherance of the aforesaid scheme and artifice to defraud and to obtain money and property from others by means of materially false and fraudulent pretenses, representations, and promises, did knowingly transmit and cause to be transmitted in interstate and foreign commerce by means of wire communications, certain writings, signs, signals and sounds, as more fully described below as to each Count:

COUNT	APPROXIMATE DATE	DESCRIPTION OF WIRE COMMUNICATION
1	May 12, 2011	Telephone conversation between an employee of Company A located in Chicago, Illinois and JEFFREY JASON COOPER in which COOPER claimed that his SWT employees would work from a commercial office space and perform office work such as answering phones, performing clerical duties, organizing retreats, cleaning, and computer programming.
2	May 24, 2011	Telephone conversation between an employee of Company A located in Chicago, Illinois and JEFFREY JASON COOPER in which COOPER claimed that his SWT employees would live above the yoga studio, and they would perform clerical work, computer programming, light cleaning, and yoga appointment scheduling.
3	June 9, 2011	Telephone conversation between an employee of Company A located in Chicago, Illinois and JEFFREY JASON COOPER in which COOPER stated that his SWT employees had not been, and would not be, asked to

		perform any type of massage work.
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In violation of Title 18, United States Code, Section 1343.

COUNT 4
**Use of Facility in Interstate and Foreign Commerce to Promote
an Unlawful Activity and Thereafter Performing an Act
to Promote Said Unlawful Activity
(18 U.S.C. § 1952(a)(3)(A))**

From on or about January 1, 2011, to February 9, 2013, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

JEFFREY JASON COOPER,
a/k/a “Dr. Janardana Dasa,”
a/k/a “Janardana,”
a/k/a “Jay,”

did knowingly use any facility in interstate and foreign commerce, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, that is, a business enterprise involving prostitution in violation of Fla. Stat. § 796.07, and thereafter did perform, and attempt to perform, an act that did promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of the unlawful activity, in violation of Title 18, United States Code, Sections 1952(a)(3)(A) and 2.

COUNT 5
**Importation of an Alien for Immoral Purpose
(8 U.S.C. § 1328)**

From on or about May 30, 2011, and continuing through on or about August 4, 2011, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

JEFFREY JASON COOPER,
a/k/a “Dr. Janardana Dasa,”
a/k/a “Janardana,”
a/k/a “Jay,”

did, directly and indirectly, import into the United States an alien for the purpose of prostitution, and for any other immoral purpose, and did keep, maintain, control, support, employ, and harbor in any house and other place, for the purpose of prostitution, and for any other immoral purpose, such alien, in pursuance of such illegal importation, in violation of Title 8, United States Code, Section 1328 and Title 18, United States Code, Section 2.

COUNT 6
Attempted Importation of an Alien for Immoral Purpose
(8 U.S.C. § 1328)

On or about June 7, 2011, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

JEFFREY JASON COOPER,
a/k/a “Dr. Janardana Dasa,”
a/k/a “Janardana,”
a/k/a “Jay,”

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

COUNTS 7-8
Sex Trafficking by Fraud
(18 U.S.C. § 1591(a)(1))

From on or about May 12, 2011, and continuing through on or about August 4, 2011, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

JEFFREY JASON COOPER,
a/k/a “Dr. Janardana Dasa,”
a/k/a “Janardana,”
a/k/a “Jay,”

did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport,

provide, obtain, and maintain by any means a person, knowing that means of fraud would be used to cause such person to engage in a commercial sex act, as specified as to each Count below:

Count	Victim
7	Victim 1
8	Victim 2

In violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1), and Title 18, United States Code, Section 2.

COUNTS 9-11
Attempted Sex Trafficking by Fraud
(18 U.S.C. §§ 1591(a)(1), 1594(a))

From on or about May 10, 2011, and continuing through on or about June 13, 2011, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

JEFFREY JASON COOPER,
a/k/a “Dr. Janardana Dasa,”
a/k/a “Janardana,”
a/k/a “Jay,”

did knowingly, in and affecting interstate and foreign commerce, attempt to recruit, entice, harbor, transport, provide, obtain, and maintain, by any means, a person, knowing that means of fraud would be used to cause such person to engage in a commercial sex act, as specified as to each Count below:

Count	Victim
9	Victim 3
10	Victim 4
11	Victim 5

In violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1), and 1594(a).

CRIMINAL FORFEITURE ALLEGATIONS

10. The allegations of this Indictment are re-alleged and by this reference fully incorporated herein for the purpose of alleging criminal forfeiture to the United States of America of certain property in which the defendant, **JEFFREY JASON COOPER**, has an interest.

11. Upon conviction of a violation of Title 18, United States Code, Section 1343, as alleged in this Counts 1 through 3 of this Indictment, the defendant shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C), all of his right, title, and interest in any property, real or personal, which constitutes or is derived from proceeds traceable to such violation.

12. Upon conviction of a violation of Title 18, United States Code, Section 1952, as alleged in Count 4 of this Indictment, the defendant shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

13. Upon conviction of a violation of Title 8, United States Code, Section 1328, as alleged in Counts 5 through 6 of this Indictment, the defendant shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C), all of his right, title, and interest in any property, real or personal, which constitutes or is derived from proceeds traceable to such violation.

14. Upon conviction of a violation of Title 18, United States Code, Section 1591, as alleged in Counts 7 through 11 of this Indictment, the defendant shall forfeit to the United States of

America, pursuant to Title 18, United States code, Section 1594(d), all of his right, title, and interest in the following:

- a. Any property, real or personal, used or intended to be used to commit or to facilitate the commission of such violation; and
- b. Any property, real or personal, which constitutes or is derived from proceeds traceable to such a violation.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and the procedures set forth in Title 21, United States Code, Section 853, made applicable by Title 28, United States Code, Section 2461(c).

A TRUE BILL

~~FOREPERSON~~



WIFREDO A. FERRER
UNITED STATES ATTORNEY



SETH M. SCHLESSINGER
ASSISTANT UNITED STATES ATTORNEY



MATTHEW T. GRADY
TRIAL ATTORNEY – CIVIL RIGHTS DIVISION

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO.: _____

vs.

CERTIFICATE OF TRIAL ATTORNEY*

JEFFREY JASON COOPER,

Defendant.

_____ /

Superseding Case Information:

Court Division: (Select One)

X 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 6-8 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	<u> </u>	Petty	<u> </u>
II.	6 to 10 days	<u> X </u>	Minor	<u> </u>
III.	11 to 20 days	<u> </u>	Misdemeanor	<u> </u>
IV.	21 to 60 days	<u> </u>	Felony	<u> X </u>
V.	61 days or over	<u> </u>		

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) Yes

If yes:

Magistrate Case No. 16-MJ-2586-WCT

Related Miscellaneous numbers: _____

Defendant(s) in federal custody as of 05/04/2016


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 Northern Region of the U.S. Attorney's Office prior to October 14, 2003?
 Yes X No

8. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to September 1, 2007?
 Yes X No



SETH M. SCHLESSINGER
ASSISTANT UNITED STATES ATTORNEY
Florida Bar No.: 064065

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: JEFFREY JASON COOPER

Case No: _____

Counts 1-3:

Wire Fraud

Title 18, United States Code, Section 1343

* Max. Penalty: Twenty (20) Years' Imprisonment

* Min. Penalty: None

Count 4:

Use of Facility in Interstate Commerce to Promote Unlawful Activity

Title 18, United States Code, Section 1952(a)(3)(A)

* Max. Penalty: Five (5) Years' Imprisonment

* Min. Penalty: None

Count 5:

Importation of Alien for Immoral Purpose

Title 8, United States Code, Section 1328

* Max. Penalty: Ten (10) Years' Imprisonment

* Min. Penalty: None

Count 6:

Attempted Importation of Alien for Immoral Purpose

Title 8, United States Code, Section 1328

* Max. Penalty: Ten (10) Years' Imprisonment

* Min. Penalty: None

***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

PENALTY SHEET

Defendant's Name: JEFFREY JASON COOPER

Case No: _____

Counts 7-8:

Sex Trafficking by Force, Fraud or Coercion

Title 18, United States Code, Sections 1591(a)(1) & (b)(1)

*** Max. Penalty:** Life Imprisonment

*** Min. Penalty:** Fifteen (15) Years' Imprisonment

Counts 9-11:

Attempted Sex Trafficking by Force, Fraud or Coercion

Title 18, United States Code, Sections 1591(a)(1), (b)(1) & 1594(a)

*** Max. Penalty:** Life Imprisonment

*** Min. Penalty:** Fifteen (15) Years' Imprisonment

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