

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. \_\_\_\_\_  
v. : DATE FILED: \_\_\_\_\_  
GREGORY E. CAPLINGER : VIOLATIONS: 18 U.S.C. § 1343  
(Wire Fraud - 39  
counts)

I N D I C T M E N T

COUNTS ONE THROUGH THIRTY-NINE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. The defendant GREGORY E. CAPLINGER purported to be the medical director of the International Institute of Medical Science Hospital and Clinic ("IIMS Hospital and Clinic") located in Santo Domingo in the Dominican Republic.

2. ImmuStim is a product held out by defendant GREGORY E. CAPLINGER to be a medication for the treatment of various conditions, including cancer, HIV/AIDS, Epstein-Barr virus, hepatitis, chronic fatigue syndrome, allergies and other immunological dysfunctions.

THE SCHEME

3. From in or about 1997, through in or about August, 1999, in the Eastern District of Pennsylvania and elsewhere, defendant

GREGORY E. CAPLINGER

devised and intended to devise a scheme to defraud sick people and their family members, and to obtain money and property from them by means of false and fraudulent pretenses, representations and promises.

It was part of the scheme that:

4. The defendant GREGORY E. CAPLINGER falsely represented, and caused others to falsely represent, to individuals suffering from serious illnesses and to their family members that:

a. CAPLINGER was a British and U.S. trained physician;

b. CAPLINGER was a British board certified medical doctor;

c. CAPLINGER had completed a Doctor of Science in Biochemistry/Immunology;

d. CAPLINGER had completed a medical residency in internal medicine;

e. CAPLINGER was board certified in internal medicine, oncology and immunology;

f. IIMS was a modern, well equipped, accredited hospital, and;

g. CAPLINGER had a genius I.Q. and was a "world renowned" doctor.

5. Defendant GREGORY E. CAPLINGER failed to disclose, and caused others to fail to disclose, to individuals suffering from serious illnesses and to their family members that:

a. in 1984 defendant GREGORY E. CAPLINGER signed a Cease and Desist Order in Florida to resolve charges of practicing medicine without a license;

b. in 1988 defendant GREGORY E. CAPLINGER pled guilty in North Carolina to the charges of practicing medicine without a license; and

c. in 1993 defendant GREGORY E. CAPLINGER pled nolo contendere in Florida to a theft charge for taking money from the elderly after promising to treat patients with Alzheimers.

6. The defendant GREGORY E. CAPLINGER sent letters to individuals suffering from serious illnesses, many of which were life-threatening, stating that they were accepted as a candidate into his ImmuStim/CAP Immunological Protocol.

7. The defendant GREGORY E. CAPLINGER misrepresented his medical education, training and experience, and caused others to misrepresent his medical education, training and experience, in order to induce individuals suffering from serious illnesses, many of which were life-threatening, to travel from the United States

and from Canada to the Dominican Republic for alleged "medical treatment" provided by CAPLINGER and his staff at the IIMS Hospital and Clinic, and to participate as candidates in his ImmuStim/CAP Immunological Protocol.

8. The defendant GREGORY E. CAPLINGER directed individuals suffering from serious illnesses and their family members to wire thousands of dollars to banks in the United States and in the Dominican Republic, or to deliver funds directly to CAPLINGER in the Dominican Republic, as payment for alleged "medical services" provided by defendant GREGORY E. CAPLINGER and his staff at the IIMS Hospital and Clinic, for participation in his ImmuStim/CAP Immunological Protocol in the Dominica Republic and, sometimes, as a condition for further "treatment." These payments totaled in excess of \$500,000.

9. On or about each of the times and dates set forth below, in the Eastern District of Pennsylvania and elsewhere, the defendant

GREGORY E. CAPLINGER

for the purpose of executing the scheme described above, caused to be transmitted by means of wire communication in interstate and foreign commerce the signals and sounds described below for each count,

each transmission constituting a separate count of this indictment:

Count	Date & Time	Description
1	6/11/97	A wire transmission of \$10,000 via Western Union in Ohio to the Dominican Republic
2	6/27/97	A wire transmission of \$8,500 via Western Union in Ohio to the Dominican Republic
3	12/30/97	A wire transmission of \$25,000 from Peoples Savings & Loan, West Liberty, Ohio to Popular Bank of Florida, in Miami, Florida
4	1/8/98	A wire transmission of \$10,000 from Peoples Savings & Loan, West Liberty, Ohio to Popular Bank of Florida, in Miami, Florida
5	2/9/98	A wire transmission of \$2,500 from Bank One, Ohio to Popular Bank of Florida, in Miami Florida
6	7/10/98	A wire transmission of \$31,200 from Citizens National Bank of Bluffton, Bluffton, Ohio to Bank of New York, New York, NY
7	10/1/98	A wire transmission of \$26,930 from Citizens National Bank of Bluffton, Bluffton, Ohio to Bank of New York, New York, NY
8	10/5/98	A wire transmission of \$15,975 from Citizens National Bank of Bluffton, Bluffton, Ohio to Bank of New York, New York, NY
9	10/16/98	A wire transmission of \$30,000 from First National Bank of Omaha, Omaha, Nebraska to Huntington National Bank, Columbus, Ohio
10	10/23/98	A wire transmission of \$15,000 from Northern Trust Company, Chicago, Illinois to Huntington National Bank, Columbus, Ohio
11	10/23/98	A wire transmission of \$44,985 from Huntington National Bank, Columbus, Ohio to Bank of New York, New York, NY

Count	Date & Time	Description
12	11/17/98	A wire transmission of \$20,000 from Northern Trust Company, Chicago, Illinois to Huntington National Bank, Columbus, Ohio
13	11/25/98	A wire transmission of \$19,950 from Huntington National Bank, Columbus, Ohio to Bank of New York, New York, NY
14	11/27/98	A wire transmission of \$20,000 from First National Bank of Maryland, Baltimore, MD to Huntington National Bank, Columbus, Ohio
15	11/30/98	A wire transmission of \$53,000 from Huntington National Bank, Columbus, Ohio to Bank of New York, New York, NY
16	12/24/98	A wire transmission of \$12,000 from First National Bank of Omaha, Omaha, Nebraska to Huntington National Bank, Columbus, Ohio
17	12/28/98	A wire transmission of \$17,700 from Huntington National Bank, Columbus, Ohio to Bank of New York, New York, NY
18	12/30/98	A wire transmission of \$40,000 from Chase Manhattan Bank NA, New York, NY to Huntington National Bank, Columbus, Ohio
19	1/4/99	A wire transmission of \$43,500 from Huntington National Bank, Columbus, Ohio to Bank of New York, New York, NY
20	1/25/99	A wire transmission of \$20,000 from US Bank Minnesota, Minneapolis MN to Huntington National Bank, Columbus, Ohio
21	1/29/99	A wire transmission of \$19,750 from Huntington National Bank, Columbus, Ohio to Bank of New York, New York, NY
22	2/22/99	A wire transmission of \$40,000 from Fleet Bank of Massachusetts, Boston, MA to Bank of New York, New York, NY

Count	Date & Time	Description
23	4/28/99	A facsimile transmission of two letters from defendant GREGORY E. CAPLINGER in Santo Domingo, Dominican Republic, to H.R. in West Chester, Pennsylvania
24	4/28/99	A facsimile transmission of a letter from defendant GREGORY E. CAPLINGER in Santo Domingo, Dominican Republic, to H.R. in West Chester, Pennsylvania
25	5/4/99	A wire transmission of \$8,830 from Fleet Bank of Massachusetts, Boston, MA to Bank of New York, New York, NY
26	7:18 p.m. 5/12/99	A telephone call from H.R. in West Chester, Pennsylvania to Santo Domingo, Dominican Republic
27	9:58 a.m. 5/13/99	A telephone call from H.R. in West Chester, Pennsylvania to Santo Domingo, Dominican Republic
28	10:14 a.m. 5/17/99	A telephone call from H.R. in West Chester, Pennsylvania to Santo Domingo, Dominican Republic
29	5:23 p.m. 5/19/99	A telephone call from H.R. in West Chester, Pennsylvania to Santo Domingo, Dominican Republic
30	7:05 p.m. 5/19/99	A telephone call from H.R. in West Chester, Pennsylvania to Santo Domingo, Dominican Republic
31	10:57 a.m. 5/25/99	A telephone call from H.R. in West Chester, Pennsylvania to Santo Domingo, Dominican Republic
32	11:22 a.m. 5/25/99	A telephone call from H.R. in West Chester, Pennsylvania to Santo Domingo, Dominican Republic
33	11:25 a.m. 5/25/99	A telephone call from H.R. in West Chester, Pennsylvania to Santo Domingo, Dominican Republic

Count	Date & Time	Description
34	11:47a.m. 5/25/99	A telephone call from H.R. in West Chester, Pennsylvania to Santo Domingo, Dominican Republic
35	5/27/99	A wire transmission of \$40,000 from The First National Bank of West Chester in West Chester, Pennsylvania to Bank of New York, New York, NY for the benefit of Banco Popular, Flavia Berroa Cta The Raphah Group, Santo Domingo, Dominican Republic
36	5:16 p.m. 5/27/99	A telephone call from H.R. in West Chester, Pennsylvania to Santo Domingo, Dominican Republic
37	6:28 p.m. 5/27/99	A telephone call from H.R. in West Chester, Pennsylvania to Santo Domingo, Dominican Republic
38	6/15/99	A facsimile transmission of a fax cover letter and letter with enclosures from K.K. in San Jose, CA to C.B. in Sherborn, MA
39	7/2/99	A facsimile transmission of a fax cover letter and letter from K.K. in San Jose, CA to C.B. in Boston, MA

In violation of Title 18, United States Code, Section 1343.

A TRUE BILL:

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FOREPERSON

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MICHAEL R. STILES  
United States Attorney