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U.S. DISTRICT COURT  
EASTERN DISTRICT OF LA.

2018 JUN 22 P 4:02

WILLIAM W. BLEVINS  
CLERK

**FELONY**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

INDICTMENT FOR WIRE FRAUD AND NOTICE OF FORFEITURE

UNITED STATES OF AMERICA

\*

CRIMINAL NO.

**18-139**

v.

\*

SECTION:

**SECT. J MAG. 2**

JOSEPH GATT

\*

VIOLATIONS: 18 U.S.C. § 1343  
18 U.S.C. § 2

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The Grand Jury charges that:

COUNTS 1 - 10

(18 U.S.C. § 1343 – Wire Fraud)

A. AT ALL TIMES MATERIAL HEREIN:

1. The defendant, **JOSEPH GATT** (“GATT”), was a resident of New Orleans, Louisiana, within the Eastern District of Louisiana.

2. Since at least 2009, **GATT** purported to sell tickets to spectator professional sporting events, including Union of European Football Associations (UEFA) Champions League and Federation Internationale De Futbol Association (FIFA) World Cup matches.

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3. Since at least 2009, **GATT** claimed to have connections with FIFA and, through those connections, could purchase tickets to World Cup games at or below face value before the tickets went on sale to the general public.

4. Since at least 2009, **GATT** operated a business enterprise in which he claimed to be able to purchase World Cup tickets at face value and then sell them at a higher price to individuals and groups who wished to attend the games.

5. **GATT** exercised control over a bank account maintained at JP Morgan Chase Bank, N.A. (“Chase”). **GATT**’s Chase account bore account number XXXXX6598.

6. **GATT** recruited individuals (“Investors”) to enter into a business arrangement with him in which they would provide him money to purchase tickets to spectator professional sporting events, such as the World Cup, sell the tickets at an inflated price, and split the profits.

7. Investor A was an individual who resided in New Orleans, Louisiana.

8. Investor A exercised control over a bank account maintained at Whitney Bank. Investor A’s Whitney Bank account bore account number XXXXXX3078.

9. Investor A exercised control over a bank account maintained at Chase Bank. Investor A’s Chase Bank account bore account number XXXXX9982.

10. Investor A and Investor A’s mother exercised joint control over a bank account maintained at Citibank, N.A. (“Citibank”). The Citibank joint account controlled by Investor A and Investor A’s mother bore account number XXXX2243.

11. In about late 2012, **GATT** met Investor A in the New Orleans area, within the Eastern District of Louisiana.

12. Between about December 10, 2012, and about November 11, 2013, Investor A provided **GATT** not less than approximately \$41,676 as financing for the purpose of enabling

**GATT** to purchase tickets to spectator professional sporting events, including the 2014 FIFA World Cup, and then sell the tickets for a profit on the secondary market.

13. Investor B was an individual who resided in New Orleans, Louisiana.

14. Investor B was a business partner and friend of Investor A.

15. Investor B exercised control over a bank account maintained at Chase Bank.

Investor B's Chase account bore account number XXXXX4933.

16. In about 2013, **GATT** met Investor B in the New Orleans area, within the Eastern District of Louisiana.

17. Investor B provided **GATT** not less than approximately \$11,200 as financing for the purpose of enabling **GATT** to purchase tickets to the 2014 FIFA World Cup and then sell the tickets for a profit on the secondary market.

18. On or about August 26, 2014, **GATT** signed a Promissory Note stating that he owed \$50,205 to Investor A and \$15,400 to Investor B after they provided financing to **GATT**.

**B. THE SCHEME TO DEFRAUD:**

Beginning at a time unknown, but not later than 2009, and continuing through at least October 22, 2014, in the Eastern District of Louisiana and elsewhere, the defendant, **JOSEPH GATT**, a resident of New Orleans, Louisiana, did knowingly devise and intend to devise a scheme and artifice to defraud Investors and to obtain money, funds, and property by means of false and fraudulent pretenses, representations, and promises, and attempting to do so, namely, that **GATT** would use of money provided to him by Investors for the purchase of tickets to professional spectator sporting events, including, but not limited to, the 2010 and 2014 FIFA World Cup Series, well knowing at the time, that the pretenses, representations, and promises would be and were false when they were made.

**C. MANNER AND MEANS:**

1. It was further part of the scheme and artifice to defraud that **GATT** falsely told Investors that **GATT** had connections with unidentified individuals from whom he could purchase advance tickets to professional spectator sporting events, including the World Cup, at or near face value.

2. It was part of the scheme and artifice to defraud that **GATT** solicited Investors to invest in a joint venture with **GATT** where they would purchase tickets to professional spectator sporting events, resell them at a profit, and split the profits.

3. It was further part of the scheme and artifice to defraud that **GATT** falsely told Investors that **GATT** would use all the investment money to purchase tickets to professional spectator sporting events, including the World Cup, when, in truth and in fact, **GATT** intended to use the money for personal purposes.

4. It was further part of the scheme and artifice to defraud that **GATT** directed the Investors to provide him cash, personal checks, and/or wire transfers as a means of financing the purchase of tickets to professional spectator sporting events.

5. It was further a part of the scheme and artifice to defraud that **GATT** purported to have access to World Cup tickets that he could purchase at or near face value and offered to sell World Cup tickets to Investors for their personal use and attendance at World Cup events.

6. It was further part of the scheme and artifice to defraud that **GATT** withdrew investment money from his Chase account and used it for personal purposes.

7. It was further part of the scheme that **GATT** provided Investors checks drawn from his Chase account that had insufficient funds to cover the amount of the checks, which he characterized as repayments for past investments with an overdue return, in an effort to give



Investors a false sense of security, to deceive Investors into believing their money was invested legitimately, to conceal the true nature of the scheme, and to convince Investors not to report **GATT** to law enforcement authorities.

**D. THE USE OF THE WIRES:**

On or about the dates set forth below, in the Eastern District of Louisiana and elsewhere, the defendant, **JOSEPH GATT**, for the purpose of executing and attempting to execute the scheme and artifice to defraud described above, did transmit and cause to be transmitted by means of wire communication in interstate commerce writing, signs, signals and sounds by means of wire communication in interstate and foreign commerce, as described below:

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION</u>
1	July 1, 2013	Wire transfer in the amount of \$10,000 from Citibank account under the control of Investor A and Investor A's mother via the Federal Reserve Wire System to <b>GATT'S</b> Chase account bearing number XXXXX6598
2	July 10, 2013	Check number 128 in the amount of \$2,125.00 drawn on Investor A's Whitney Bank account, bearing account number XXXXXX3078, made payable to <b>GATT</b> and deposited into <b>GATT'S</b> Chase account bearing number XXXXX6598
3	August 4, 2013	Check number 134 in the amount of \$1,856.00 drawn on Investor A's Whitney Bank account, bearing account number XXXXXX3078, made payable to <b>GATT</b> and deposited into <b>GATT'S</b> Chase account bearing number XXXXX6598
4	September 6, 2013	Check (unnumbered) in the amount of \$2,000.00 drawn on Investor A's Whitney Bank account, bearing account number XXXXXX3078, made payable to <b>GATT</b> and deposited into <b>GATT'S</b> Chase account bearing number XXXXX6598.
5	October 9, 2013	Check number 827 in the amount of \$3,700.00 drawn on Investor B's Chase account, bearing account number XXXXX4933, made payable to <b>GATT</b> and deposited into <b>GATT'S</b> Chase account bearing number XXXXX6598
6	October 10, 2013	Check (unnumbered) in the amount of \$7,700.00 drawn on Investor A's Whitney Bank account, bearing account number XXXXXX3078, made payable to <b>GATT</b> and deposited into <b>GATT'S</b> Chase account bearing number XXXXX6598
7	October 22, 2013	Check number 127 in the amount of \$525.00 drawn on Investor A's Whitney Bank account, bearing account number XXXXXX3078, made payable to <b>GATT</b> and deposited into <b>GATT'S</b> Chase account bearing number XXXXX6598
8	October 30, 2013	Check number 8895 in the amount of \$2500.00 drawn on Investor A's Chase Bank account, bearing account number XXXXX9982, made payable to <b>GATT</b> and deposited into <b>GATT'S</b> Chase account bearing number XXXXX6598
9	November 11, 2013	Check number 9831 in the amount of \$5000.00 drawn on Investor A's Chase Bank account, bearing account number XXXXX9982, made payable to <b>GATT</b> and deposited into <b>GATT'S</b> Chase account bearing number XXXXX6598
10	November 12, 2013	Check number 987 in the amount of \$7,500.00 drawn on Investor B's Chase Bank account, bearing account number XXXXX4933, made payable to <b>GATT</b> and deposited into <b>GATT'S</b> Chase account bearing number XXXXX6598

All in violation of Title 18, United States Code, Sections 1343 and 2.

**NOTICE OF WIRE FRAUD FORFEITURE**

1. The allegations of Counts 1-10 of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 1343 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461.

2. As a result of the offense alleged in Counts 1-10, the defendant, **JOSEPH GATT**, shall forfeit to the United States pursuant to Title 18, United States Code, Sections 1343 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461, any and all property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Section 1343.

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, as a result of any act or omission of the defendant:

- 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 said defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 1343 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461.

A TRUE BILL:

  
FOREPERSON

DUANE A. EVANS  
UNITED STATES ATTORNEY

  
JORDAN GINSBERG

Assistant United States Attorney  
Illinois Bar No. 6282956

New Orleans, Louisiana  
June 22, 2018