

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Crim. No. 21-
 :
 v. : 18 U.S.C. §§ 1343 and 2
 :
 JEFFREY BURD :
 :

I N F O R M A T I O N

The defendant having waived in open court prosecution by indictment, the Acting United States Attorney for the District of New Jersey, charges:

COUNT ONE
(Wire Fraud)

1. At all times relevant to this Information:

a. Defendant JEFFREY BURD (“BURD”) was a resident of New Jersey and purported to make money by buying tickets to high profile concerts, sporting events, and Broadway shows and then reselling the tickets for a profit.

b. “Victim Investors” were individuals who invested money with BURD for his purported ticket resale business.

The Scheme to Defraud

2. From in or around January 2014 through in or around June 2018, in the District of New Jersey and elsewhere, defendant

JEFFREY BURD

did knowingly and intentionally devise and intend to devise a scheme and artifice to defraud victim investors and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, as

set forth more fully below.

Goal of the Scheme

3. The goal of the scheme was for BURD to enrich himself by fraudulently inducing the Victim Investors into investing money in his ticket resale scheme by making material misrepresentations and omissions.

Manner and Means of the Scheme

4. It was part of the scheme to defraud that:

a. BURD made numerous material misrepresentations to the Victim Investors, including that he would use their investments to purchase tickets not generally available to the public and then resell those tickets at a mark-up, with the profits of the sales to be shared between BURD and the Victim Investors.

b. BURD assured the Victim Investors that investing with him carried no risk and promised returns of 30% to 40%.

c. Based on his material misrepresentations, BURD obtained more than approximately \$447,000 from the Victim Investors over the course of the fraudulent scheme.

d. BURD made payments to certain Victim Investors that were purportedly their profits, and made representations to certain Victim Investors that portions of their profits were being reinvested in additional ticket deals, which in turn purportedly would generate more profits for those Victim Investors. This enabled the scheme to go undetected by the Victim Investors.

e. In fact, BURD did not purchase or sell any material amount of tickets with the Victim Investors' money.

f. Instead of using the Victim Investors' money as he had promised them he would, BURD diverted their money and used it for his own personal expenditures.

Execution of the Scheme

5. On or about November 20, 2016, in the District of New Jersey and elsewhere, for the purpose of executing and attempting to execute this scheme and artifice to defraud, defendant

JEFFREY BURD

did knowingly and intentionally transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce writings, signs, signals, pictures, and sounds, namely, BURD placed a phone call from in or around Las Vegas, Nevada to to a Victim Investor in or around Elizabeth, New Jersey.

In violation of Title 18, United States Code, Section 1343 and Section 2.

FORFEITURE ALLEGATION

1. The allegations contained in this Information are incorporated by reference as though set forth in full herein for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981 and Title 28, United States Code, Section 2461.

2. As a result of committing the offense charged in Count One of this Information, defendant

JEFFREY BURD

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981 and Title 28, United States Code, Section 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the said offense, and all property traceable thereto.

Substitute Assets Provision


3. If any of the above-described forfeitable property, 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 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of

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


RACHAEL A. HONIG
Acting U.S. Attorney

CASE NUMBER: _____

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INFORMATION FOR

18 U.S.C. §§ 1343 & 2

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