

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

FILED  
2021 APR -1 PM 5:40

UNITED STATES OF AMERICA

v.

CASE NO. *8:21-cr-123-TPB-CPT*  
18 U.S.C. § 1343

THOMAS COEHLO

SEAL

INDICTMENT

The Grand Jury charges:

COUNTS ONE AND TWO  
(Wire Fraud)

A. Introduction

At times material to this Indictment:

1. The defendant, Thomas Coehlo, resided in the Middle District of Florida.

B. The Scheme and Artifice

2. Beginning on an unknown date, but from at least in or around March 2016, and continuing through at least in or around March 2019, in the Middle District of Florida and elsewhere, the defendant,

THOMAS COEHLO,

knowingly devised and intended to devise a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises.

**C. Manner and Means of the Scheme and Artifice**

3. The manner and means by which the defendant sought to accomplish the object of the scheme and artifice included, among others, the following:

a. It was a part of the scheme and artifice that the defendant would and did recruit investors for a business opportunity that purportedly involved purchasing event tickets and reselling those tickets to third parties at a profit;

b. It was further a part of the scheme and artifice that the defendant would and did form businesses for this purpose;

c. It was further a part of the scheme and artifice that the defendant would and did establish or obtain access to business and personal bank accounts at federally-insured banking institutions;

d. It was further a part of the scheme and artifice that the defendant would and did establish accounts with ticket sale and resale companies;

e. It was further a part of the scheme and artifice that the defendant would and did use his association with persons and entities in the entertainment industry to give the appearance of the means and ability to acquire tickets to certain high-profile events;

f. It was further a part of the scheme and artifice that the defendant would and did falsely and fraudulently promise the investors that they would receive exorbitant rates of return on their investments if they participated in the business opportunity;

g. It was further a part of the scheme and artifice that the defendant would and did require up-front payments from investors, which the defendant would and did fraudulently represent would be used to purchase event tickets or would otherwise be invested in the business opportunity;

h. It was further a part of the scheme and artifice that the defendant would and did provide the investors with worthless contracts and false and fraudulent business and financial records in order to induce the investors to invest or continue to invest in the business opportunity;

i. It was further a part of the scheme and artifice that the defendant would and did provide the investors with false and fraudulent financial records to encourage the investors to “reinvest” nonexistent profits;

j. It was further a part of the scheme and artifice that the defendant would and did misappropriate and misuse investor funds for, among other things, personal expenses, entertainment, and cash withdrawals without the investors’ consent or knowledge;

k. It was further a part of the scheme and artifice that the defendant would and did, on occasion, purchase event tickets and would and did provide the tickets or evidence of their purchase to the investors in order to conceal the fraud;

l. It was further a part of the scheme and artifice that the defendant would and did originate new “business opportunities” and encourage investors to participate with the promise that the new venture would help repay the investors for their prior investment losses;

m. It was further a part of the scheme and artifice that the defendant would and did falsely and fraudulent represent to others that he had other sources of income when he did not;

n. It was further a part of the scheme and artifice that the defendant would and did use and cause to be used interstate and foreign wire communications;

o. It was further a part of the scheme and artifice that the defendant would and did engage in multiple meetings, perform acts, and make statements to promote and achieve the object of the scheme and artifice and to misrepresent, hide, and conceal, and cause to be misrepresented, hidden, and concealed, the purpose of the scheme and artifice and the acts committed in furtherance thereof.

**D. Execution of the Scheme and Artifice**

4. On or about the date set forth below in each count, in the Middle District of Florida and elsewhere, the defendant,

THOMAS COEHLO,

for the purpose of executing the scheme and artifice described above, transmitted and caused to be transmitted by means of wire communication in interstate and foreign commerce the writings, signs, signals, pictures, and sounds described below:

COUNT	DATE	DESCRIPTION OF WIRE COMMUNICATION
ONE	May 26, 2016	Interstate money wire transfer of \$40,000 from victim G.D. in Los Angeles, California, to JP Morgan Chase, N.A. bank account ending in -7838 in the name of Go2Market, located in the Middle District of Florida

COUNT	DATE	DESCRIPTION OF WIRE COMMUNICATION
TWO	August 30, 2018	Interstate money wire transfer of \$70,000 from victim C.D. in the Middle District of Florida, through banking servers located outside of the Middle District of Florida, to Bank of America account ending in -5076 in the name of the defendant, located in the Middle District of Florida

All in violation of 18 U.S.C. § 1343.

### FORFEITURE

1. The allegations contained in Counts One and Two of this Indictment are incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

2. Upon conviction of a violation of 18 U.S.C. § 1343, the defendant,  
THOMAS COEHLO,  
shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

3. The property to be forfeited includes, but is not limited to, the approximately \$1,874,174.76 in proceeds the defendant obtained as a result of the commission of the offenses.

4. If any of the property described above, 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 party;
- 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 divided without difficulty;

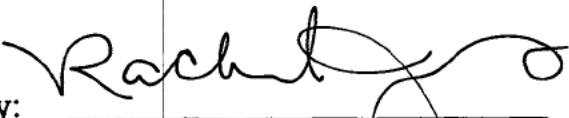
the United States of America shall be entitled to forfeiture of substitute property under the provisions of 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

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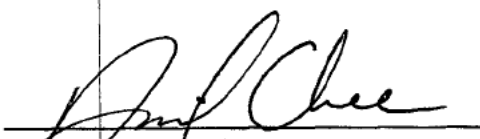
Fore

KARIN HOPPMANN  
Acting United States Attorney

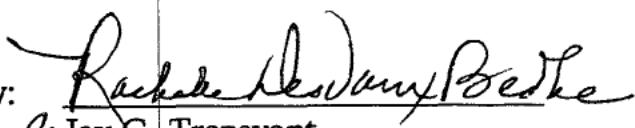
By:

  
Rachel K. Jones  
Assistant United States Attorney

By:

  
David W.A. Chee  
Assistant United States Attorney

By:

  
Jay G. Trezevant  
Assistant United States Attorney  
Chief, Economic Crimes Section

March 21

No.

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**UNITED STATES DISTRICT COURT**  
Middle District of Florida  
Tampa Division

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THE UNITED STATES OF AMERICA

vs.

THOMAS COEHLO

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**INDICTMENT**

Violations: 18 U.S.C. § 1343

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A true

Foreperson

Filed in open court this 1st day  
of April, 2021.

\_\_\_\_\_  
Clerk

Bail \$ \_\_\_\_\_

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