

FILED

12/15/2020

TL

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)

v.)

ADAM TRACY)

No. **1:20-cr-00892**

Violation: Title 26, United States
Code, Section 7202

Judge Edmond E. Chang
Magistrate Judge Sunil R. Harjani

The UNITED STATES ATTORNEY charges:

1. At times material to this Information:

a. ADAM TRACY was a resident of Illinois who managed, controlled, operated and directed Securities Compliance Group, Ltd.

b. Securities Compliance Group, Ltd. was an Illinois corporation established in or about December 2013, and it was based in the Northern District of Illinois. Securities Compliance Group, Ltd. was a law practice and consulting practice, and it sometimes did business as "Clearing Link, LLC," "Wabash Capital Advisors, Ltd.," "Guanwei Recycling Corporation," and "The Tracy Firm., Ltd.," and certain other variations of these names.

c. Securities Compliance Group, Ltd. withheld taxes from its employees' paychecks, including Medicare and social security taxes (often referred to as Federal Insurance Contribution Act or "FICA" taxes) and federal

income taxes (collectively “payroll taxes.”) Securities Compliance Group, Ltd. was required to make deposits of the payroll taxes to the Internal Revenue Service on a periodic basis. In addition, Securities Compliance Group, Ltd. was required to file, one month following the end of each calendar quarter, an Employer’s Quarterly Federal Income Tax Return (Form 941), setting forth the total amount of wages and other compensation subject to withholding, the total amount of income tax withheld, the total amount of social security and Medicare taxes due, and the total deposits.

d. Defendant, ADAM TRACY, was a “responsible person,” meaning he had the responsibility for collecting, accounting for, and paying over to the Internal Revenue Service the payroll taxes for Securities Compliance Group, Ltd.

e. For the period of approximately the 4th Quarter of 2014 through the 2nd Quarter of 2018, Securities Compliance Group, Ltd. withheld payroll taxes from its employees, but made no payments to the Internal Revenue Service which were due.

f. Beginning in January 2015 and continuing through July 2018, Securities Compliance Group, Ltd. failed to file quarterly employment tax returns (Forms 941) with the Internal Revenue Service.

g. Altogether, during the fifteen calendar quarters alleged in Counts 1-15 of this Indictment, Securities Compliance Group, Ltd. failed to account and pay over approximately \$137,403.76 in payroll taxes.

2. On or about the due dates listed below, in the Northern District of Illinois, Eastern Division, and elsewhere,

ADAM TRACY,

defendant herein, did willfully fail to truthfully account for and pay over to the Internal Revenue Service all of the federal income taxes withheld and Federal Insurance Contributions Act ("FICA") taxes due and owing to the United States on behalf Securities Compliance Group, Ltd. and its employees in the amounts and in each quarter listed below in Counts One through Fifteen, each calendar quarter constituting a separate count of this Information,

COUNT	QUARTER ENDING	DUE DATE	APPROXIMATE UNPAID WITHHELD PAYROLL TAXES
1	12/31/2014	1/31/2015	\$472
2	3/31/2015	4/30/2015	\$6,838
3	6/30/2015	7/31/2015	\$8,427
4	9/30/2015	10/31/2015	\$7,952
5	12/31/2015	1/31/2016	\$5,480
6	3/31/2016	4/30/2016	\$15,494

7	6/30/2016	7/31/2016	\$15,494
8	9/30/2016	10/31/2016	\$16,383
9	12/31/2016	1/31/2017	\$19,136
10	3/31/2017	4/30/2017	\$12,499
11	6/30/2017	7/31/2017	\$16,619
12	9/30/2017	10/31/2017	\$6,767
13	12/31/2017	1/31/2018	\$6,314
14	3/31/2018	4/30/2018	\$2,232
15	6/30/2018	7/31/2018	\$3,620

Each in violation of Title 26, United States Code, Section 7202:

**JASON
YONAN**

Digitally signed by JASON
YONAN
Date: 2020.12.15 07:50:38
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Signed by Jason Yonan on behalf of the
UNITED STATES ATTORNEY