

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA            )  
  )  
  ) No.  
  )  
TRACY MONTI                                ) Violations: Title 18, United States Code,  
  ) Sections 1343 and 1957

COUNT ONE

The SPECIAL AUGUST 2015 GRAND JURY charges:

1. At times material to this indictment:
  - a. Tickets for live events, such as concerts and sporting events, were sold in both primary and secondary markets.
  - b. In the primary market for event tickets, event promoters and venues typically sold tickets at face value. Ticket brokers typically purchased tickets in bulk from one or more primary market sources.
  - c. In the secondary market for event tickets, ticket brokers sold tickets to the general public and these tickets were generally sold at an upcharge, which included broker's fees.

2. Beginning no later than 2010, and continuing until at least in or around October 2015, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

TRACY MONTI,

defendant herein, knowingly devised, intended to devise, and participated in a scheme to defraud investors and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and by concealment of material facts.

3. It was part of the scheme that defendant MONTI obtained over \$5 million from investors funds by misrepresenting and causing to be misrepresented that MONTI would use the investors' funds to purchase event tickets from primary market sources at face value and then re-sell the tickets in the secondary market at a profit, knowing that those funds were instead used to purchase tickets from brokers on the secondary market at an upcharge, to pay for MONTI's personal expenses, including the purchase of a vehicle and a house, and to repay other investors.

4. It was further part of the scheme that defendant MONTI misrepresented to investors that she had business relationships with multiple primary market sources, including Individual A, Individual B, and Venue A, through which MONTI purportedly purchased tickets at face value. In fact, MONTI did not have those business relationships and did not purchase tickets at face value in the primary market from Individual A, Individual B, or Venue A.

5. It was further part of the scheme that defendant MONTI falsely represented to investors that their funds would be used to purchase tickets in the primary market at face value. In fact, MONTI used investor funds to purchase tickets at an upcharge from ticket brokers on the secondary market and to pay for MONTI's personal expenses, including the purchase of a vehicle and a house in Chicago.

6. It was further part of the scheme that defendant MONTI falsely represented to investors that once she purchased tickets from primary market sources, she would sell the tickets at a profit on the secondary market and repay investors for their entire initial investment, as well as a percentage of the profits. In fact, MONTI knew that she did not make a profit from the sale of tickets and used investors' funds to make payments to other investors, which she concealed from the investors, and for her own benefit.

7. It was further part of the scheme that defendant MONTI falsely told some investors that she was going to repay investors within days of their investments when, in fact, MONTI knew that she did not have the funds to repay investors and had used investor funds to make payments to earlier investors and unauthorized personal expenses.

8. It was further part of the scheme that defendant MONTI did misrepresent, conceal, and hide, and caused to be misrepresented, concealed, and hidden, acts done in furtherance of the scheme and the purpose of those acts.

9. On or about April 5, 2012, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

TRACY MONTI,

defendant herein, for the purpose of executing the scheme to defraud, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an email transmitted through a server located in another state, from MONTI to Investor A, asking Investor A to invest additional funds;

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

COUNT TWO

The SPECIAL AUGUST 2015 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One are incorporated here.
2. On or about April 5, 2012, at Chicago, in the Northern District of Illinois,

Eastern Division, and elsewhere,

TRACY MONTI,

defendant herein, for the purpose of executing the scheme to defraud, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an interstate electronic signal for the transfer of \$24,000 from a Chase Bank account to a Bank of America account, which funds represented investment funds from Investor A;

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

COUNT THREE

The SPECIAL AUGUST 2015 GRAND JURY further charges:

On or about April 6, 2012, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

TRACY MONTI,

defendant herein, knowingly engaged in a monetary transaction, in and affecting interstate commerce and involving criminally derived property of a value greater than \$10,000, namely, the purchase of a cashier's check from Bank of America for which the total transaction amount was \$10,010, such properly having been derived from a specified unlawful activity, namely, wire fraud as charged in Count Two;

In violation of Title 18, United States Code, Sections 1957 and 2.

COUNT FOUR

The SPECIAL AUGUST 2015 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One are incorporated here.
2. On or about June 1, 2012, at Chicago, in the Northern District of Illinois,

Eastern Division, and elsewhere,

TRACY MONTI,

defendant herein, for the purpose of executing the scheme to defraud, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an email transmitted through a server located in another state, from MONTI to Investor A, asking Investor A to invest additional funds;

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

COUNT FIVE

The SPECIAL AUGUST 2015 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One are incorporated here.
2. On or about June 1, 2012, at Chicago, in the Northern District of Illinois,

Eastern Division, and elsewhere,

TRACY MONTI,

defendant herein, for the purpose of executing the scheme to defraud, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an interstate wire transfer in the amount of \$100,000, processed through the Federal Reserve System from a Chase Bank account to a Bank of America account, which funds represented investment funds from Investor A;

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



COUNT SIX

The SPECIAL AUGUST 2015 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One are incorporated here.
2. On or about February 3, 2012, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

TRACY MONTI,

defendant herein, for the purpose of executing the scheme to defraud, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an interstate wire transfer in the amount of \$7,500, processed through the Federal Reserve System from a Chase Bank account to a Bank of America account, which funds represented investment funds from Investor B;

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

COUNT SEVEN

The SPECIAL AUGUST 2015 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One are incorporated here.
2. On or about December 20, 2012, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

TRACY MONTI,

defendant herein, for the purpose of executing the scheme to defraud, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an interstate wire transfer in the amount of \$90,000, processed through the Federal Reserve System from a TD Ameritrade account held at First National Bank of Omaha to a Bank of America account, which funds represented investment funds from Investor C;

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

COUNT EIGHT

The SPECIAL AUGUST 2015 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One is incorporated here.
2. On or about December 27, 2013, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

TRACY MONTI,

defendant herein, for the purpose of executing the scheme to defraud, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an electronic signal for the transfer of \$35,000, through an electronic processing center located in another state, from a Chase Bank account to another Chase Bank account, which funds represented investment funds from Investor D;

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

COUNT NINE

The SPECIAL AUGUST 2015 GRAND JURY further charges:

On or about January 13, 2013, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

TRACY MONTI,

defendant herein, knowingly engaged in a monetary transaction, in and affecting interstate commerce and involving criminally derived property of a value greater than \$10,000, namely, a wire transfer of funds in excess of \$35,000 from a TCF Bank account to a BMO Harris Bank account, such properly having been derived from a specified unlawful activity, namely, wire fraud as charged in Count Eight;

In violation of Title 18, United States Code, Sections 1957 and 2.

## FORFEITURE ALLEGATION

The SPECIAL AUGUST 2015 GRAND JURY alleges:

1. The allegations of Counts One through Nine of this Indictment are incorporated here for the purpose of alleging forfeiture to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

2. As a result of the offenses charged in Counts One through Nine of this Indictment,

TRACY MONTI,

defendant herein, shall forfeit to the United States any and all right, title, and interests he has in any property, real and personal, which is derived from proceeds traceable to the offenses in Counts One through Nine.

3. The interests of defendant subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C) as incorporated by Title 28, United States Code, Section 2461(c), include but are not limited to approximately \$5,021,050 and the property located at 311 North Parkside Avenue, Chicago, Illinois, and legally described as:

LOT 12 IN BLOCK 4 IN THE SUBDIVISION OF BLOCK 4 AND THE EAST PART OF BLOCK 5 IN FRINK'S RESUBDIVISION OF THE NORTH 36 1/4 ACRES OF THE EAST 1/2 OF THE SOUTHEAST 1/4 OF SECTION 8, AND THE NORTH 36 1/4 ACRES OF THE WEST 1/2 OF THE SOUTHWEST 1/4 OF SECTION 9, TOWNSHIP 39 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

Permanent Index Number: 16-08-405-015-0000.

4. If, as a result of any act or omission by the defendant, any of the forfeitable property described above:

- 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 shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

\_\_\_\_\_  
UNITED STATES ATTORNEY