

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of Rhode Island

United States of America
v.

Monique Brady (YOB 1975)

Case No.

1:19 MJ25 LDA

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 6, 2018 in the county of _____ in the
District of Rhode Island, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 1343	Wire Fraud

This criminal complaint is based on these facts:

See the attached Affidavit of Special Agent Pepper Daigler, of the Federal Bureau of Investigation ("FBI").

Continued on the attached sheet.

Complainant's signature

Special Agent Pepper Daigler - FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 4/25/2019

Judge's signature

City and state: Providence, Rhode Island

Lincoln D. Almond, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT OF PEPPER DAIGLER

I, Pepper Daigler, Special Agent of the Federal Bureau of Investigation, being duly sworn, depose and state as follows:

1. I am employed as a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been so employed since January 2016. I submit this affidavit in support of a criminal complaint charging MONIQUE BRADY (“BRADY”) (DOB XX/XX/1975) with, having devised a scheme or artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations and promises, did transmit by means of wire communications in interstate and foreign commerce, writings, signs, signals, and pictures (Wire Fraud), in violation of 18 U.S.C. § 1343 (Count One).

2. BRADY owns and operates MNB LLC (“MNB”), a Schedule C business that performs preservation work on bank-owned foreclosed homes for resale. MNB does work to preserve the current condition of the property, such as mowing lawns, changing locks, and winterizing properties, in preparation for resale by the banks. BRADY originally incorporated MNB in October of 2005.

3. Most of the preservation projects secured by MNB are for relatively small dollar amounts, from as low as \$25 to a few hundred dollars. Nonetheless, BRADY raises large sums of capital from investors. BRADY does so by misrepresenting to investors that she needs to pay subcontractors tens of thousands of dollars and that the profit would be split between her and the investors. BRADY solicits investments from friends, family members and business associates, often via email, to fund the projects with the promise the investor will receive fifty percent of the profit.

4. Emails acquired from numerous investors show Brady soliciting bids by listing the current projects to the prospective investor. Brady offers the investor a choice of projects from the list to bid on. Brady's email lists the project's address, cost, the expected profits and the investor's share of the profits. Investors' initial acceptance of the bid is communicated via a reply email.

5. An investor of BRADY ("INVESTOR A") provided to the IRS multiple emails between BRADY and INVESTOR A where BRADY solicited INVESTOR A to fund a number of rehabilitation projects. The emails list the properties' addresses, project costs, and profits, to include INVESTOR A's share of the profits. Brady represented to INVESTOR A that after Brady and MNB completed the rehabilitation, INVESTOR A would receive half of the profits. During the course of their business relationship, INVESTOR A invested more than \$1,000,000 with BRADY.

6. INVESTOR A told investigators that Brady primarily solicited him via email for rehabilitation projects. If INVESTOR A agreed to fund a project, Brady would forward a promissory note via email. For example,

- a. in an email dated April 6, 2018, BRADY requests \$155,085 for the rehabilitation of 4 separate properties. BRADY states INVESTOR A's profit share will be \$15,067.
- b. in an email dated January 22, 2018, BRADY requests \$238,103 for the rehabilitation of 5 separate properties. BRADY states INVESTOR A's profit share will be \$28,998.

- c. in an email dated January 16, 2017, BRADY requests \$197,735 for the rehabilitation of 5 separate properties. BRADY states INVESTOR A's profit share will be \$19,329.
- d. in an email dated October 18, 2016, BRADY requests \$63,175 for the rehabilitation of 1 property. BRADY states INVESTOR A's profit share will be \$9,000.

7. A second investor of BRADY's ("INVESTOR B") provided to the IRS multiple emails between BRADY and INVESTOR B where BRADY solicited INVESTOR B to fund a number of real estate rehabilitation projects. The emails list the properties' addresses, project costs, and profits, to include INVESTOR B's share of the profits. Brady represented to INVESTOR B that after Brady and MNB completed the rehabilitation, INVESTOR B would receive half of the profits.

8. INVESTOR B told investigators that Brady primarily solicited him via email for rehabilitation projects. If INVESTOR B agreed to fund a project, Brady would forward a promissory note to him. For example,

- a. in an email dated January 15, 2018, BRADY requests \$238,103 for the rehabilitation of 5 separate properties. BRADY states that INVESTOR B's profit share will be \$28,998. In a reply email, INVESTOR B tells Brady he "can take all of these."
- b. in an email dated December 4, 2017, BRADY requests \$326,469 for the rehabilitation of 6 separate properties. BRADY states that INVESTOR B's profit share will be \$28,536.

9. Evidence indicates that BRADY fraudulently obtained more than \$10 million from investors that she fraudulently claimed was necessary to fund large scale rehabilitation projects during the years in question. Brady acquired these funds through the acceptance of multiple bids for the same project, by misrepresenting projects for menial tasks as higher-dollar projects and by soliciting investments on properties on which MNB did not perform any work whatsoever.

10. First, evidence reveals that BRADY solicited multiple bids for the same project, thereby acquiring significantly more money than the project required. For example, on January 15, 2018, at 11:41 AM, Brady emailed INVESTOR B asking whether he would be interested in funding five different projects. At 12:36 PM that same day, INVESTOR B emailed Brady that he “can take all of these.” Brady acknowledged INVESTOR B’s acceptance of the projects in a reply email at 2:58 PM that same day. On January 22, 2018, at 7:15 AM, Brady emailed INVESTOR B to tell him that two of five projects are starting that week, but funding for the other three projects is not necessary for another few weeks. Just over an hour later, at 8:41 AM on January 22, 2018, Brady sent an email to INVESTOR A soliciting money for the same five projects.

11. Similar instances saw Brady acquire multiple investors for the following projects:
- a. Two investors for the 144 Scappa Flow Road project in Charlestown, RI. Brady received \$20 in income for the project and \$120,006 in investments.
 - b. Five investors for the 20 Arlee Road project in Warwick, RI. Brady received \$35 in income for the project and \$47,925 in investments.
 - c. Three investors for the 208 Connors Road project in Gardner, RI. Brady received \$100 in income for the project and \$93,825 in investments.

12. Second, BRADY misrepresented projects and solicited significantly more money than an individual project required. BRADY performed relatively menial tasks at some locations for relatively little money. Menial tasks included snow removal, electrical inspections or boiler inspections. She presented the bids for the menial tasks to investors as full-fledged rehabilitation projects, thereby acquiring upwards of tens-of-thousands of dollars more than the project required. For example, an invoice dated June 27, 2016, Brady bills \$450 for electrical and boiler inspections for a property at 41 Long Street, Warwick, RI. In October of 2016, Brady sent an email to an investor detailing a project at that same address for \$28,855. Brady only received \$1,175 in income for the Long Street project.

13. BRADY also solicited investments from investors for projects that did not exist. Agents have noted numerous instances where BRADY emailed prospective investors that she had been awarded a rehabilitation project by Freddie Mac. Freddie Mac's records show no evidence of BRADY being awarded these projects. In other instances, BRADY told investors that projects she actually had been awarded were Freddie Mac projects. In reality, the projects were associated with real estate entities other than Freddie Mac. The evidence suggests BRADY used the Freddie Mac name to provide more credibility to her solicitation.

14. A review of bank and other financial records reveals that BRADY received approximately \$10,076,291 in investments from 32 individuals based on numerous false and fraudulent representations. Many of these investors had very close and personal relationships with BRADY, including close friends, her step-brother and the former nanny for her children. Numerous of the investors suffered substantial harm as a result of BRADY's fraudulent conduct, including an elderly woman who lost nearly all of her life savings and another elderly man with Alzheimer's disease who lost his life savings to BRADY. As part of the scheme, BRADY often

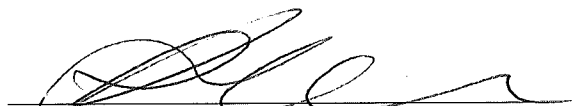
paid back some of the money she received from one investor with monies received from another. By the time the scheme ended after its discovery in the summer of 2018, twenty-three individuals had lost approximately \$4,495,237 to BRADY.

15. On or about April 6, 2018, defendant MONIQUE BRADY, having devised a scheme or artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations and promises, did transmit by means of wire communication in interstate and foreign commerce, writings, signs, signals, and pictures, to wit an email to S.S. in which BRADY fraudulently requested that S.S. invest \$155,085 for the rehabilitation of 4 separate properties, in violation of 18 U.S.C § 1343.



Pepper Daigler
Special Agent
Federal Bureau of Investigation

SUBSCRIBED and SWORN to before me on this 25th day of April, 2019.



HONORABLE LINCOLN D. ALMOND
UNITED STATES MAGISTRATE JUDGE

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: INFORMATION INDICTMENT COMPLAINT

CASE NO. 1:19 MJ 25 LDA

Matter Sealed: Juvenile Other than Juvenile
 Pre-Indictment Plea Superseding Defendant Added
 Indictment Charges/Counts Added
 Information

USA vs.
 Defendant: Monique N. Brady

Name of District Court, and/or Judge/Magistrate Location (City)
 UNITED STATES DISTRICT COURT RHODE ISLAND
 DISTRICT OF RHODE ISLAND Divisional Office

Name and Office of Person
 Furnishing Information on
 THIS FORM AARON WEISMAN
 U.S. Atty Other U.S. Agency
 Phone No. (401) 709-5000
 Name of Asst.
 U.S. Attorney LEE H. VILKER
 (if assigned)

REDACTED

Alien
 (if applicable)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)
Federal Bureau of Investigation

person is awaiting trial in another Federal or State Court
 (give name of court)

 this person/proceeding transferred from another district
 per (circle one) FRCP 20, 21 or 40. Show District

 this is a reprosecution of charges
 previously dismissed which were
 dismissed on motion of:
 U.S. Atty Defense
 this prosecution relates to a
 pending case involving this same
 defendant. (Notice of Related
 Case must still be filed with the
 Clerk.)
 prior proceedings or appearance(s)
 before U.S. Magistrate Judge
 regarding this defendant were
 recorded under

SHOW
 DOCKET NO.

MAG. JUDGE
 CASE NO.

Issue: Warrant Summons

Location Status:

Arrest Date _____ or Date Transferred to Federal Custody _____

Currently in Federal Custody
 Currently in State Custody
 Writ Required
 Currently on bond
 Fugitive

Defense Counsel (if any): _____

FPD CJA RET'D
 Appointed on Target Letter

Place of
 offense RHODE ISLAND County

This report amends AO 257 previously submitted

OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 1

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
	18 U.S.C. § 1343	Wire Fraud	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
		Estimated Trial Days: 3 days	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor