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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

GABRIEL MARTIN REED,

Defendant.

CR No. 17

CR17-0310

I N F O R M A T I O N

[18 U.S.C. § 1343: Wire Fraud; 18
U.S.C. § 1028A(a)(1): Aggravated
Identity Theft]

The Acting United States Attorney charges:

COUNTS ONE THROUGH FIVE

[18 U.S.C. § 1343]

A. INTRODUCTORY ALLEGATIONS

1. From at least as early as in or around January 2013 through in or around April 2017, defendant GABRIEL MARTIN REED ("REED") resided in Malibu, California and Los Angeles, California, both within the Central District of California.

2. At all times relevant to this Information, defendant REED controlled Gabe Reed Productions ("GRP"), an entity incorporated in Texas and purportedly involved in the production and promotion of events, including, but not limited to, musical concerts and World Wrestling Entertainment ("WWE") events.

1 3. At all times relevant to this Information, defendant REED
2 exercised control over and had access to the following bank accounts:

3 a. USC Credit Union bank account xxxx2609, in the name of
4 D.S-M. ("USC Credit Union Account 2609");

5 b. Wells Fargo bank account xxxxxx6140 in the name of
6 Gabriel Reed ("Wells Fargo Bank Account 6140"); and

7 c. Bank of Internet bank account xxxxxxxx7099 in the name
8 of Gabe Reed ("Bank of Internet Account 7099").

9 B. THE SCHEME TO DEFRAUD

10 4. Beginning at least in or about June 2008 and continuing to
11 the present, in Los Angeles County, within the Central District of
12 California, and elsewhere, defendant REED, knowingly and with intent
13 to defraud, devised, participated in, and executed a scheme to
14 defraud investors, promoters, and performers who provided funds to
15 defendant REED in connection with musical concerts and World
16 Wrestling Entertainment events (collectively, the "victims") as to
17 material matters, and to obtain money and property from such victims
18 by means of material false and fraudulent pretenses, representations,
19 and promises, and the concealment of material facts.

20 C. THE MANNER AND MEANS OF THE SCHEME TO DEFRAUD

21 5. The scheme to defraud operated, in substance, in the
22 following manner:

23 a. Through oral statements and written materials,
24 defendant REED induced investors to invest funds with him in
25 connection with events defendant REED and GRP claimed to be
26 promoting.

27 b. Through oral statements and written materials,
28 defendant REED induced promoters to provide him funds to cover

1 expenses of events defendant REED and GRP claimed to be promoting.

2 c. Through oral statements and written materials,
3 defendant REED induced performers to provide him funds to cover
4 expenses of events and to secure a performance spot in events
5 defendant REED and GRP claimed to be promoting.

6 d. To obtain the victims' funds, defendant REED made
7 representations that were false and concealed material facts,
8 including representations that: events were scheduled to go forward;
9 certain performers had agreed to participate in those events; and the
10 victims' funds would be used to pay for expenses in connection with
11 the organization and promotion of those events. In truth and in
12 fact, as defendant REED well knew, the representations were false and
13 concealed material facts because, among other things: the events were
14 never booked or defendant REED intended to cancel the events in
15 advance; the performers had not agreed to participate in the events;
16 and the victims' funds would not be used to organize and promote the
17 events. Rather, defendant REED used the victims' funds to pay his
18 personal expenses, including payment of his rent, utility bills, and
19 travel expenses, which he failed to disclose to the victims.

20 e. In reliance on defendant REED's false representations,
21 the victims directed funds to defendant REED by wire or check. When
22 the investment or payment was in the form of a wire, defendant REED
23 directed the victim to wire funds to USC Credit Union Account 2609,
24 Wells Fargo Bank Account 6140, or Bank of Internet Account 7099.
25 When the investment or payment was in the form of a check, defendant
26 REED directed that the check be made payable to him.

27 f. When a victim inquired with defendant REED about the
28 status of the events, defendant REED lied to the victim about the

1 status of the event and what had been done with the victim's funds in
 2 order to conceal that he had diverted the victim's funds for his own
 3 purposes. On occasion, defendant REED supplied the victims with
 4 fraudulent and fabricated artist contracts, bank statements, and
 5 correspondence, in order to conceal and further the scheme to
 6 defraud.

7 D. THE USE OF THE WIRES

8 6. On or about the following dates, in Los Angeles County,
 9 within the Central District of California, and elsewhere, defendant
 10 REED, for the purpose of executing the above-described scheme to
 11 defraud, transmitted and caused the transmission of the following
 12 items by means of wire communication in interstate and foreign
 13 commerce:

<u>COUNT</u>	<u>DATE</u>	<u>WIRE</u>
ONE	11/21/2012	Transfer of approximately \$85,000 from a Wells Fargo bank account in the name of S.K., by means of interstate wires, to USC Credit Union Account 2609 in Los Angeles, California.
TWO	05/13/2013	Transfer of approximately \$40,000 from a Wells Fargo bank account in the name of S.K., by means of interstate wires, to USC Credit Union Account 2609 in Los Angeles, California.

<u>COUNT</u>	<u>DATE</u>	<u>WIRE</u>
THREE	04/14/2015	Transfer of approximately \$250,000 from a Wells Fargo bank account in the name of I.F. in Los Angeles, California, by means of interstate wires, to Bank of Internet Bank Account 7099.
FOUR	10/2/2015	Transfer of approximately \$50,000 from a J.P. Morgan Chase bank account controlled by M.C. in Beverly Hills, California, by means of interstate wires, to Wells Fargo Bank Account 6140.
FIVE	10/6/2015	Wire transfer of approximately \$50,000 from a J.P. Morgan Chase bank account controlled by M.C. in Beverly Hills, California, by means of interstate wires, to Wells Fargo Bank Account 6140.

COUNT SIX

[18 U.S.C. § 1028A(a) (1)]

7. On or about December 1, 2015, in Los Angeles County, within the Central District of California, defendant GABRIEL MARTIN REED ("REED") knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, that is, the name of F.G., a promoter who defendant REED falsely represented to M.C. had made an offer to purchase several of the concerts in which M.C. had invested with defendant REED, during and in relation to Wire Fraud, a felony violation of Title 18, United States Code, Section 1343, as charged in Counts Four and Five of this Information.

SANDRA R. BROWN
Acting United States Attorney



LAWRENCE S. MIDDLETON
Assistant United States Attorney
Chief, Criminal Division

GEORGE S. CARDONA
Assistant United States Attorney
Chief, Major Frauds Section

JILL T. FEENEY
Assistant United States Attorney
Deputy Chief, Major Frauds Section

POONAM G. KUMAR
Assistant United States Attorney
Major Frauds Section