

RECEIVED

3/31/2023

SMB 23CR193

**JUDGE ELLIS
MAGISTRATE JUDGE COX**

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

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	No.
v.)	
)	Violation: Title 18, United States
SEAN GRUSD)	Code, Section 1343
)	
)	Information

The ACTING UNITED STATES ATTORNEY charges:

1. At times material to this information:

a. Dylan Ventures LLC, November Acquisitions SPV LLC, and December Acquisitions SPV LLC (collectively, "the Grusd Entities") were entities formed and controlled by defendant SEAN GRUSD.

b. Company A and Company B were privately owned businesses.

c. Victims A through O were individuals who made investments in various of the Grusd Entities (collectively, "the Investor Victims").

2. Beginning in or about February 2021, and continuing until in or about December 2022, in the Northern District of Illinois, Eastern Division, and elsewhere,

SEAN GRUSD,

defendant herein, knowingly devised, intended to devise, and participated in a scheme to defraud the Investor Victims, and to obtain and attempt to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, as further described below.

3. It was part of the scheme that defendant defrauded the Investor Victims out of over \$23 million by falsely representing to them that their money would be used to make investments in privately owned businesses, including Company A and Company B. In fact, instead of making any such investments, defendant misappropriated all the Investor Victims' money, including by paying personal expenses; purchasing extravagant luxury items for himself and others, such as Tesla and Porsche automobiles, vacations, and real estate; and transferring money to other people, including his fiancé.

4. It was further part of the scheme that defendant provided a PowerPoint presentation to certain of the Investor Victims knowing that it falsely reflected that Dylan Ventures previously had made successful investments in various privately held companies, when, in fact, no such investments had been made.

5. It was further part of the scheme that defendant falsely represented to Victim C that defendant owned \$50 million worth of shares in Company A and that he would sell those shares to November Acquisitions at a discount, when, in fact, defendant owned no shares in Company A.

6. It was further part of the scheme that defendant falsely represented to certain of the Investor Victims that he intended to cause December Acquisitions to purchase shares in Company B with the Investor Victims' money, when, in fact, defendant did not intend to use that money to purchase shares in Company B.

7. It was further part of the scheme that defendant caused fraudulent stock certificates to be created and provided to certain of the Investor Victims, which

certificates falsely reflected that: (a) November Acquisitions had paid \$50 million for shares in Company A; and (b) December Acquisitions had paid \$100 million for shares in Company B; when, in fact, neither of those Grusd Entities purchased shares in either of those companies.

8. It was further part of the scheme that defendant falsely represented to certain of the Investor Victims his educational background and his investment and professional experience, including that he graduated from Harvard Law School.

9. It was further part of the scheme that defendant provided to Victim C fabricated and forged documents purporting to be share purchase contracts, which defendant knew falsely reflected that two venture capital firms had agreed to purchase the shares of Company B from December Acquisitions for hundreds of millions of dollars.

10. It was further part of the scheme that defendant provided Victim C with a fabricated bank statement for December Acquisitions that he knew falsely reflected a balance of \$133 million, when, in fact, the balance in that account was zero.

11. It was further part of the scheme that defendant misrepresented, concealed, and hid, and caused to be misrepresented, concealed, and hidden, the purposes of the scheme and acts done in furtherance of the scheme.

12. As a result of the scheme, defendant defrauded the Investor Victims out of approximately \$23,155,000.

13. On or about November 26, 2021, in the Northern District of Illinois, and elsewhere,

SEAN GRUSD,

defendant herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an interstate wire transfer of \$10,000,000 from a bank account controlled by Victim C to the bank account of November Acquisitions;

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

Signed by Jason Yonan on behalf of the
ACTING UNITED STATES ATTORNEY