

FILED
12/2/2021

JMK

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

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)
)
 v.)
)
GEOFFREY THOMPSON)

No. **1:21-CR-00728**

Violation: Title 18, United States
Code, Section 1343

JUDGE KNESS
MAGISTRATE JUDGE VALDEZ

The UNITED STATES ATTORNEY charges:

1. At times material to this Information:

a. GEOFFREY THOMPSON was a resident of Frankfort, Illinois, Colorado, and Florida. He was the owner and operator of Company A, and its predecessor entities.

b. Company A and its predecessor entities were Canadian corporations which GEOFFREY THOMPSON established and managed and which did business in Colorado. Company A and its predecessors were in the cannabis industry.

c. Company B was a conglomerate of approximately 16 different cannabis-related entities located in various states.

2. Beginning no later than in or about January 2018, and continuing until no earlier than in or about July 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

GEOFFREY THOMPSON,

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

3. It was part of the scheme that defendant GEOFFREY THOMPSON fraudulently solicited, obtained and retained more than \$952,000 in investors' funds based on false representations that the funds would be used for the purpose of expanding Company A's business and having an initial public offering of securities, when THOMPSON intended to and did spend and take those funds for his own personal benefit and to repay prior investors.

4. It was further part of the scheme that defendant GEOFFREY THOMPSON represented to investors in Company A that their money would be used for expenses related to an initial public offering of Company A securities, when THOMPSON knew that much of the money would be used for his own personal use and to repay prior investors.

5. It was further part of the scheme that defendant GEOFFREY THOMPSON told investors on multiple occasions that an initial public offering of Company A's securities would happen in a matter of a couple months' time, when he knew that Company A was not in a position to have an initial public offering during that time frame.

6. It was further part of the scheme that defendant GEOFFREY THOMPSON misrepresented to investors the financial status of Company A by, among other things, representing to investors that Company A had secured access to bank financing, when it had not, and representing to investors that Company A had revenues resulting from an acquisition of Company B, when it did not.

7. It was further part of the scheme that defendant GEOFFREY THOMPSON represented to investors that Company A's acquisition of Company B was completed, when he knew that despite closing on the acquisition of Company B, Company A still owed millions of dollars to Company B in seller-financing.

8. It was further part of the scheme that defendant GEOFFREY THOMPSON concealed from investors that Company A had defaulted on its payments to Company B for its acquisition of Company B and, as a result, that Company A had only a small ownership position in Company B, rather than a

controlling ownership position, and he continued to raise money for Company A from new investors even after defaulting on its payments to Company B.

9. It was further part of the scheme that defendant GEOFFREY THOMPSON did not use the investors' funds as he had promised, but instead he used those funds for his own personal use, including for an unrelated business venture he had and for the benefit of his family members.

10. It was further part of the scheme that defendant GEOFFREY THOMPSON misappropriated some investor funds by transferring the funds to earlier investors, which served to lull earlier investors into believing their funds were safe.

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

12. As a result of the scheme, defendant GEOFFREY THOMPSON fraudulently misappropriated at least approximately \$952,000.

13. On or about December 20, 2018, in the Northern District of Illinois, Eastern Division, and elsewhere,

GEOFFREY THOMPSON,

defendant herein, for the purpose of executing the above-described scheme, did knowingly cause 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 approximately \$100,000 from Victim A's account at Wells Fargo Bank, through the Federal Reserve System, to an account of Company A, at Ent Credit Union;

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

**JASON
YONAN**

Digitally signed by
JASON YONAN
Date: 2021.12.01
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Signed by Jason Yonan on behalf of the
UNITED STATES ATTORNEY