AUSAs: Margery Feinzig and Christopher Morel

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA v. ANDREW LAUB, Defendant.	26 mj 4672 **SEALED COMPLAINT** Violations of 18 U.S.C. § 1343 and 2 COUNTY OF OFFENSE: WESTCHESTER

SOUTHERN DISTRICT OF NEW YORK, ss.:

DANIEL J. GABEL, being duly sworn, deposes and says that he is a Postal Inspector with the United States Postal Inspection Service ("USPIS"), and charges as follows:

COUNT ONE
(Wire Fraud)

1. From at least in or about 2020 through at least in or about December 2025, in the Southern District of New York and elsewhere, ANDREW LAUB, the defendant, knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, to wit, LAUB induced victims to invest millions of dollars in the purported purchase, renovation, and resale of properties in the Southern District of New York and elsewhere based on false and fraudulent statements, and sent and received, and caused others to send and receive, emails and other electronic communications, to and from the Southern District of New York and elsewhere, in furtherance of the fraud.

(Title 18, United States Code, Sections 1343 and 2.)

The bases for my knowledge and for the foregoing charge are, in part, as follows:

2. I am a Postal Inspector with USPIS. I have been personally involved in the investigation of this matter. This affidavit is based on my participation in the investigation of this matter, my conversations with other law enforcement agents, victims, witnesses, and others, as well as my examination of documents and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part unless indicated otherwise.

Background of the Investigation

3. Based on my interviews of victims and review of emails, texts, and publicly available information, I am aware that, since at least in or about 2020 through in or about December 2025, ANDREW LAUB, the defendant, held himself out to be a real estate developer formerly associated with a real estate investment firm that "owned and manage[d] a portfolio of residential, commercial and medical office buildings with a combined value of over $750 m[illion] in assets." LAUB solicited investments for the alleged purchase, renovation, and resale of properties located in New York and elsewhere. LAUB promised investors that they would receive their principal with a substantial return.

4. As detailed below, based on my review of bank records, ANDREW LAUB, the defendant, did not use the money he received from investors to purchase or develop properties. Instead, LAUB used those monies on personal expenses and Ponzi-type payments to victims.

LAUB Induced Victims to Invest in Purported Real Estate Properties

5. I have interviewed a victim ("Victim-1"), who resides in Westchester County, New York, and has known ANDREW LAUB, the defendant, for several years. Based on my interview of Victim-1 as well as my review of documents, emails, and recordings Victim-1 provided to law enforcement, I have learned the following:

a. In or about 2020, LAUB approached Victim-1 with a purported opportunity to invest in properties that were being redeveloped and sold. LAUB told Victim-1 that members of his family were participating in the investments. LAUB also told Victim-1 that loans would be repaid when the properties were sold or refinanced and that Victim-1 would receive approximately 45% in interest. LAUB provided Victim-1 with addresses and other information about the purported properties. Based on LAUB's representations, in or about 2020, Victim-1 loaned LAUB approximately $250,000. Thereafter, LAUB made what he represented to be monthly interest payments for the purported real estate investment. As a result of LAUB's representations and monthly interest payments, Victim-1 and, subsequently, members of Victim-1's family, issued additional loans to LAUB for the purported purchase and renovation of properties.

b. On or about June 7, 2025, Victim-1 sent an email to LAUB attaching two Word documents confirming loan amounts Victim-1 had made to LAUB since in or around 2020. The Word documents listed the approximate date, amount, and property address for each loan Victim-1 and Victim-1's family extended to LAUB. The documents reflected that Victim-1 and Victim-1's family had advanced the loans to some of LAUB's family members for particular properties; that they had advanced the loans through LAUB on or around the dates indicated; and that the loans would pay annual interest of approximately 45% payable monthly, and the principal would be paid in full at the time of LAUB's family members' choosing.

c. On or about June 11, 2025, LAUB sent an email to Victim-1 and attached signed copies of the two Word documents, confirming the details of the loans that Victim-1 and Victim-1's family had extended to LAUB.

d. Between in or about 2020 and in or about 2025, Victim-1 and Victim-1's family loaned LAUB millions of dollars for purported real estate investments in Virginia, Texas, and Florida.

e. On or about January 5, 2026, Victim-1 called LAUB and recorded the conversation. Based on my review of the recording of that call, I understand that, during the call, LAUB admitted, in sum and substance, that he did not invest Victim-1 and Victim-1's family's money in real estate, as promised. Instead, LAUB used the money for personal expenses. LAUB also admitted to creating fake emails from family members purporting to confirm Victim-1 and Victim-1's family's investments in properties. Based on my training and experience and participation in this investigation, I believe LAUB created fake emails to lull Victim-1 into falsely believing that LAUB had invested Victim-1 and Victim-1's family's money in real estate, as he had represented, to cover up and further the fraud scheme.

6. As part of my investigation, I interviewed a second victim ("Victim-2"), who resides in Connecticut, and has known ANDREW LAUB, the defendant, for approximately twelve years. Based on my interview of Victim-2 as well as my review of emails and documents Victim-2 provided to law enforcement, I have learned the following:

a. In or about 2025, LAUB approached Victim-2 about investing in properties. LAUB told Victim-2 that Victim-2 would receive his capital back plus interest from the investments.

b. In or about May 2025, LAUB approached Victim-2 about investing in a residential property located in the Bronx, New York (the "Bronx Property") and reselling it for a profit.

c. On or about May 7, 2025, LAUB sent Victim-2 an email with the subject line, "Bronx Deal." The email stated: "[Victim-2] As per our conversation yesterday, we will be going in together in the deal on the flip on [the Bronx Property] in the Bronx. We will both be putting $180k in each and receiving it back within approximately 45 days with a profit of $55k total ($27,500 each). I put down the deposit this afternoon and am looking to close on the buy next Tuesday or Wednesday. Please send $180k to me."

d. On or about May 9, 2025, LAUB caused Victim-2 to wire approximately $180,000 to LAUB for Victim-2's investment in the Bronx Property. LAUB later represented to Victim-2 that LAUB used Victim-2's money to purchase the Bronx Property.

e. Based on my review of property records, however, I understand that LAUB never held an ownership interest in the Bronx Property for which he purported to invest Victim-2's money, and it was last sold to an unrelated party in or about 2006.

7. As part of my investigation, I interviewed a third victim ("Victim-3"), who resides in Florida, and has known ANDREW LAUB, the defendant, since childhood. Based on my

interview of Victim-3 as well as my review of emails and documents Victim-3 provided to law enforcement, I have learned the following:

a. In or about 2025, LAUB approached Victim-3 about investing in properties. LAUB told Victim-3 that Victim-3 would receive his capital back plus interest from the investments.

b. In or about July 2025, LAUB approached Victim-3 about investing in a residential property in Bedford, New York (the "Bedford Property").

c. On or about July 9, 2025, LAUB sent Victim-3 an email with the subject line, "Deal in Bedford NY." In the email, LAUB wrote, "[t]his property in Bedford a few miles from me is ready to buy. I was able to get the septic approved by the town to enable the house to have 3 more bedrooms and bathrooms. No one was able to or tried so I got the deal and it's easy to flip. We are buying it for $1.1 M and adding 200k of TLC improvements. All in $1.3M I'm doing 1/2 with my sister taking a piece so you can do the other $650k or whatever works. You are getting $150k back so can add that to this, so up to $500k is yours. Houses in that neighborhood are anywhere from $2.5 - $5M. Closing Friday. The hold will be 90-120 days tops and I'll send you same guarantee. The broker, I know well and she will sell it for us as well. Each $100k invested will bring back $150k. $500k returns $750k. Need funds by Friday but told you I can front some of it needed for a week. This one is in my hood and a HR."

d. On or about July 14, 2025, LAUB sent Victim-3 an email with the subject line, "Bedford Property." In the email, LAUB wrote, "[a]ttached is the note on the $600k for the Bedford deal." The promissory note, which LAUB executed, was in favor of Victim-3 in the amount of approximately $900,000, which included "the previous $150k, now $175,000k," for what LAUB represented to be the purchase and resale of the Bedford Property.

e. On or about July 14, 2025, LAUB caused Victim-3 to wire LAUB approximately $325,000 for what LAUB represented to be the purchase and resale of the Bedford Property. LAUB later represented to Victim-3 that LAUB used Victim-3's money to purchase the Bedford Property.

f. Based on my interview of the owner of the Bedford Property for which LAUB purported to invest Victim-3's money, I understand that the Bedford Property was on the market in or about 2025 and LAUB visited several times but never made an offer to purchase the Bedford Property and never held an ownership interest in it.

LAUB Misused the Victims' Money

8. Based on my review of bank records for ANDREW LAUB, the defendant, I have learned that, during the course of the fraud, LAUB sent payments to some victims after receiving money from other victims. It also appears that much of the money sent to LAUB by victims was spent on personal items and gambling.

9. Based on my interviews of Victim-1, Victim-2, and Victim-3, as well as my review of bank records, I have learned that Victim-1, Victim-2, and Victim-3 together lost approximately $5,758,630.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of ANDREW LAUB, the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.

Daniel J. Gabel
Postal Inspector
United States Postal Inspection Service

Sworn to before me
this 5th day of November, 2026.

THE HONORABLE JUDITH C. McCARTHY
Chief United States Magistrate Judge
Southern District of New York