

Approved: Robert B. Sobelman
ROBERT B. SOBELMAN
Assistant United States Attorney

Before: THE HONORABLE SARAH L. CAVE
United States Magistrate Judge
Southern District of New York

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UNITED STATES OF AMERICA

- v. -

JOSHUA HALL,

Defendant.

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SEALED COMPLAINT

Violations of
18 U.S.C. §§ 1343,
1028A, and 2

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SOUTHERN DISTRICT OF NEW YORK, ss.:

KATRINA LAPERUTA, being duly sworn, deposes and says that she is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE
(Wire Fraud)

1. From at least in or about September 2019 up to and including at least in or about December 2020, in the Southern District of New York and elsewhere, JOSHUA HALL, the defendant, willfully and 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, did transmit and cause to be transmitted by means of wire and radio communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, and attempted to do the same, to wit, HALL defrauded hundreds of victims by making false representations, both in his own name and when impersonating others, in the course of soliciting funds for a purported political affinity

organization that did not exist and then used the funds raised for his own personal living expenses.

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

COUNT TWO
(Aggravated Identity Theft)

2. From at least in or about September 2019, up to and including at least in or about December 2020, in the Southern District of New York and elsewhere, JOSHUA HALL, the defendant, knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), and attempted to do the same, to wit, HALL, without lawful authority, used the names and photographs of at least two victims to impersonate them on social media in order to fraudulently solicit funds and falsely confer HALL with legitimacy, during and in relation to the offense charged in Count One of this Indictment.

(Title 18, United States Code, Sections 1028A(a)(1) and (b), and 2.)

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

3. I am a Special agent with the FBI and I have been personally involved in the investigation of this matter. This affidavit is based upon my personal participation in the investigation of this matter, my conversations with other law enforcement agents, witnesses, and others, as well as my examination of reports 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 the course of 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, except where otherwise indicated.

Overview

4. Based on my involvement in this investigation, and as set forth in greater detail below, I have become aware of a scheme in which JOSHUA HALL, the defendant, defrauded hundreds of victims by making false representations in the course of raising funds for a purported political affinity organization ("the Fictitious Political Organization"), for the ostensible purpose of supporting the reelection of the individual who was at that time serving as President of the United States ("the President"). However, the Fictitious Political Organization did not exist and HALL used the funds raised for his own personal living expenses.

5. Central to the scheme was the impersonation by JOSHUA HALL, the defendant, of members of the President's family, among others, through his creation and use of social media accounts bearing those family members' names and photographs. HALL used those accounts to amass more than 100,000 followers on social media and obtain media coverage, a public platform he then exploited to confer on himself and the Fictitious Political Organization a false imprimatur of close ties with the President's family and to encourage victims to make monetary contributions to the Fictitious Political Organization.

6. In total, the scheme devised and executed by JOSHUA HALL, the defendant, yielded thousands of dollars from hundreds of victims located throughout the United States, including in the Southern District of New York.

HALL's Identity Theft and Fraudulent Online Fundraising Scheme

7. Based on my review of the contents of email and social media accounts obtained by judicially authorized search warrants, records provided by a crowdfunding website (the "Crowdfunding Website"), and records provided by financial institutions, I have learned, among other things, the following:

a. From in or about September 2019 through in or about November 2020, JOSHUA HALL, the defendant, created several social media accounts bearing the names and photographs of other persons, which he used to impersonate those individuals in public posts and private messages. The posts and messages, among other things, included purported endorsements of HALL and

the Fictitious Political Organization and encouraged others to follow HALL's personal social media account, which, beginning in July 2020, HALL used to frequently solicit funds for the Fictitious Political Organization.

b. On or about July 9, 2020, HALL launched a fundraising campaign for the Fictitious Political Organization on the Crowdfunding Website. According to statements HALL made on the webpage for the Fictitious Political Organization on the Crowdfunding Website, the campaign was to fund "field organizing, events, and merchandise" for the Fictitious Political Organization, ostensibly in support of the President's reelection effort.

c. The individuals whom HALL impersonated on social media principally included members of the President's family. Specifically, on or about July 12, 2020, HALL created and began using a social media account bearing the name and photograph of one of the President's siblings ("Victim-1"). HALL used that social media account to make numerous posts that were purported to be made by Victim-1. For example, on July 23, 2020, HALL, impersonating Victim-1, made a public social media post that falsely stated that Victim-1 "runs" the Fictitious Political Organization with HALL and that "Josh is doing great work so please give him a follow and support him!" HALL also used the account in Victim-1's name to refer others to HALL's personal social media account, from which he repeatedly made solicitations for the Fictitious Political Organization.

d. Approximately three days after Victim-1's death was publicly reported on or about August 15, 2020, HALL created and began using a social media account bearing the name and photograph of the President's minor child ("Victim-2"). HALL used that social media account to make numerous posts that were purported to be made by Victim-2. For example, on or about August 23, 2020, HALL, impersonating Victim-2, made a public social media post that stated that HALL was Victim-2's "friend and partner" and that "Josh is an amazing patriot who is doing tremendous things for our great country. He has my COMPLETE AND TOTAL ENDORSEMENT!" HALL also used the account in Victim-2's name to refer others to HALL's personal social media account,

from which he repeatedly made solicitations for the Fictitious Political Organization.

e. Throughout the execution of the scheme, HALL made false statements to potential contributors about his online fundraising for the Fictitious Political Organization. For example, on or about August 16, 2020, HALL sent a private message on social media falsely stating that the funds raised for the Fictitious Political Organization on the Crowdfunding Website would be spent on "field organization and merchandise," and that he "hadn't seen a dime of that money personally."


f. In or about December 2020, the Crowdfunding Website contacted HALL and repeatedly requested documentation showing how HALL used the funds raised for the Fictitious Political Organization. HALL never provided any such documentation. The Crowdfunding Website subsequently closed HALL's account.

g. In total, the aforementioned scheme devised and executed by HALL yielded thousands of dollars from hundreds of victims located throughout the United States, including in the Southern District of New York, which HALL used on his own personal living expenses.

WHEREFORE, deponent respectfully requests that a warrant be issued for the arrest of JOSHUA HALL, the defendant, and that he be arrested and imprisoned or bailed, as the case may be.

/s **Katrina Laperuta** (By Court
with authorization)
KATRINA LAPERUTA
SPECIAL AGENT
FEDERAL BUREAU OF INVESTIGATION

Sworn to before me by
reliable electronic means
on this 1st day of June, 2021



THE HONORABLE SARAH L. CAVE
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK