

FILED
MAR 11 2021
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

SIR MAEJOR PAGE,

Defendant.

) INDICTMENT

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3:21 CR 157
JUDGE HELMICK

CASE NO.

Title 18, United States Code,
Sections 1343, 1956(a)(1)(B)(i),
1957

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

1. Defendant SIR MAEJOR PAGE was a resident of Toledo, Ohio.
2. On or about February 18, 2016, Defendant created a Black Lives Matter of Greater Atlanta (“BLMGA”) Facebook page.
3. In or around March 2016, Defendant registered a Section 501(c)(3) domestic non-profit corporation with the Georgia Secretary of State Corporation’s Division called “BLACK LIVES MATTER OF GREATER ATLANTA INC” as a civic/social organization. Defendant assumed the role of president and CEO of the corporation.
4. On or about August 8, 2017, the Internal Revenue Service approved Defendant’s request granting BLMGA tax exempt status pursuant to Section 501(c)(3).
5. Based on information that Defendant provided, Facebook, located in California, recognized BLMGA as a non-profit organization. This status permitted BLMGA to appear alongside legitimate charities in Facebook search results and allowed users to make donations

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directly to BLMGA through Facebook. Facebook reserves the use of a “donate button” for only these types of organizations.

6. BLMGA’s non-profit Facebook page was linked to a Bank of America account ending in “7235,” named “Black Lives Matter of Greater Atlanta, Inc” (“BLMGA account”). Defendant was the only signatory on the BLMGA account. On a bi-monthly basis, Facebook Payments, Inc. transmitted, via wire transfers, the donations collected from the BLMGA’s Facebook page to the BLMGA bank account.

7. On or about May 15, 2019, BLMGA’s tax-exempt status as a charity with the IRS was revoked due to failure to submit IRS Form 990 for three consecutive years. Similarly, on or about August 26, 2019, the Georgia Secretary of State Corporations Division administratively dissolved BLMGA’s non-profit corporation because of Defendant’s failure to file necessary paperwork. Defendant did not notify Facebook of these revocations or ask that Facebook remove the “donate button.” Therefore, BLMGA’s Facebook page continued to be displayed as a non-profit organization with a donation button through the end of September 2020, and, as a result, Facebook continued to collect and disperse the purported charitable donations to the BLMGA account on a bi-monthly basis.

The Scheme to Defraud

8. From in or around May 2020 to on or about September 25, 2020, Defendant devised and carried out a scheme to defraud donors out of more than \$450,000, by false pretenses, representations, and promises that “donations” to BLMGA would be used to combat racial and social injustices, and by making material omissions indicating the same, when in truth and in fact, and as Defendant then well knew, BLMGA was no longer an established charity and Defendant was actually using the “donations” for his own personal benefit.

9. To create the false pretense and representation that BLMGA was a legitimate social justice organization, Defendant routinely made posts on BLMGA's public Facebook page about social and racial issues, including those in Georgia. For example, on or about May 24, 2020, Defendant posted on the public BLMGA Facebook page, "BREAKING NEWS. New video surveillance surfaces of officers beating up #GeorgeFloyd who is unarmed and handcuffed. #JusticeForGeorgeFloyd." The post included an embedded video showing the deadly police encounter between George Floyd and the Minneapolis Police Officers.

10. On or about June 8, 2020, Defendant posted on the public BLMGA Facebook page, "That re-affirms that we are doing what is required of us. Even while protests are taking place all over the country as a direct response to police brutality Philly officers haven't gotten the message. This chokehold has been banned by almost all police departments in this nation. These officers display no compassion nor empathy for the community that they were working in. They pulled their guns out on people of color who weren't offering any signs of violence . . ." along with an embedded video showing a police officer applying a chokehold to an arrestee.

11. On or about June 18, 2020, Defendant posted on the public BLMGA Facebook page, "#JUSTICFORAHMAUDARBERY" with a flyer below it about a community bike ride on June 20, 2020 in Georgia.

12. On or about June 25, 2020, Defendant posted on the public BLMGA Facebook page, "We live in a country where people feel some type of way about the three letter word 'BLM' but feel comfortable with the three letter word 'KKK.' Let that marinate on your brain."

13. On or about August 17, 2020, Defendant posted on the public BLMGA Facebook page, "Hi Everyone, We've been blown away by the millions that are coming together to demand justice- for George Floyd, Breonna Taylor, Tony McDade, and countless others who've

had their lives taken. Months have passed since George Floyd's death ignited a global movement – and you're still fighting, don't give up ... keep saying their names!!”

14. On or about September 24, 2020, Defendant posted on the public BLMGA Facebook page, “We are committed into demanding justice for our dear sister #BreonnaTaylor.”

15. In addition to public postings, Defendant used the BLMGA handle to communicate with other Facebook users privately. These communications required transmissions via wire from Defendant's electronic device in the Northern District of Ohio, Western Division, to Facebook in California. In those private messages, he expressly represented, falsely, that the “donations” would be used to fight for George Floyd and the “movement,” as detailed below:

| <u>Date</u> | <u>Facebook Recipient</u> | <u>Message</u> |
|-------------|---------------------------|---|
| 6/3/2020 | K.K. | “All funds will be used to fight for george floyd” |
| 6/3/2020 | A.D. | “All funds will be used to fight for george floyd” |
| 6/3/2020 | A.T. | “We will be using funds to fight for justice for george floyd” |
| 6/4/2020 | I.H. | “you can send donations they just aren't tax exempt- funds will be used to help protests in other needed markets” |
| 6/29/2020 | K.K. | “Its not personal. Its for the movement” |
| 6/29/2020 | K.K. | “Just to clear things up Ni [sic] funds have been used for personal items. All movement related” |

16. Based on the foregoing false pretenses, representations, and promises, both publicly and privately made, and material omissions, over one hundred people donated to BLMGA through its Facebook page, including I.H., who donated \$26 on the same day that

Defendant falsely represented to her in a private Facebook message that the “funds will be used to help protests in other needed markets.”

17. On or about the dates listed below, Defendant, for the purpose of executing and attempting to execute the foregoing scheme and artifice to defraud, transmitted and caused to be transmitted, writings, signs, signals, pictures and sounds by means of wire communications, in interstate commerce, to wit: wire transfers from the Facebook Payments, Inc. located in California, to Bank of America, located in North Carolina, for the purpose of transferring money to BLMGA’s bank account as set forth in the table below:

| <u>Date</u> | <u>Approximate Amount of Money Transferred</u> |
|-------------|--|
| 6/17/2020 | \$36,493.80 |
| 7/3/2020 | \$323,425.24 |
| 7/20/2020 | \$47,508.45 |
| 8/4/2020 | \$30,234.46 |
| 8/19/2020 | \$22,590.23 |

Use of Fraud Proceeds

18. Defendant used a substantial portion of the funds donated to BLMGA in a manner inconsistent with the organization’s public and private pretenses, representations, and promises. Specifically, Defendant used the donations to buy personal items, entertainment, hotel rooms, clothing, firearms, and real property for personal use in Toledo, Ohio, and, on at least one occasion, to pay a prostitute.

19. On or about the dates listed below, Defendant used these funds at various businesses and entities in the Northern District of Ohio, Western Division, and Georgia, for the purpose of purchasing various personal items or services, as set forth in the table below:

| <u>Date</u> | <u>Approximate Amount</u> | <u>Business/Entity</u> |
|-------------|---------------------------|---|
| 7/8/2020 | \$316 | Pyramid Lounge (Toledo, Ohio) |
| 7/10/2020 | \$909.48 | Apple Store (Toledo, Ohio) |
| 7/20/2020 | \$1,310.55 | Best Buy (Toledo, Ohio) |
| 7/27/2020 | \$660.94 | Hyatt Regency (Atlanta, Georgia) |
| 7/27/2020 | \$1,239.81 | Dillards (Toledo, Ohio) |
| 7/27/2020 | \$825.83 | Dillards (Toledo, Ohio) |
| 8/13/2020 | \$204.00 | ATM Cash Withdrawal at Renaissance Hotel (Atlanta, Georgia) |
| 8/13/2020 | \$104.00 | ATM Cash Withdrawal at Renaissance Hotel (Atlanta, Georgia) |
| 8/24/2020 | \$11,481.00 | Furniture Palace (Toledo, Ohio) |
| 8/24/2020 | \$1,061.70 | Furniture Palace (Toledo, Ohio) |
| 8/24/2020 | \$806.02 | Home Depot (Toledo, Ohio) |
| 8/24/2020 | \$2,125.67 | Home Depot (Toledo, Ohio) |
| 8/24/2020 | \$2,188.29 | Walmart (Toledo, Ohio) |
| 8/24/2020 | \$1,518.44 | Walmart (Toledo, Ohio) |
| 8/27/2020 | \$578.93 | Walmart (Oregon, Ohio) |
| 8/27/2020 | \$701.42 | Walmart (Toledo, Ohio) |
| 8/27/2020 | \$260.69 | Walmart (Toledo, Ohio) |
| 8/27/2020 | \$1,413.52 | Walmart (Toledo, Ohio) |
| 9/1/2020 | \$697.06 | Towers Armory (Oregon, Ohio) |
| 9/8/2020 | \$2,217.12 | Towers Armory (Oregon, Ohio) |

20. Defendant spent the largest sum of the funds on real property, to wit: a house and adjoining vacant lot on Glenwood Avenue and Maplewood Avenue, Toledo, Ohio, which was to be used as his personal residence. Defendant paid for this property with a single wire transfer of \$108,499.83 on or about August 20, 2020 from BLMGA's bank account to Greater Metropolitan Title Company, headquartered in Toledo, Ohio. Defendant attempted to conceal the purchase of the real property by titling the property to "Hi Frequency Ohio" and requested that the seller's realtor enter into a nondisclosure agreement, thereby preventing the seller from disclosing Defendant as the true buyer and disclosing that he used BLMGA's funds.

COUNT 1
(Wire Fraud, 18 U.S.C. § 1343)

The Grand Jury further charges:

21. The factual allegations set forth in paragraphs 1 through 20 of this Indictment are realleged and incorporated as if fully rewritten herein.

22. From in or around May 2020 to on or about September 25, 2020, in the Northern District of Ohio, Western Division, and elsewhere, Defendant SIR MAEJOR PAGE devised and intended to devise a scheme or artifice to defraud and obtain money from Facebook users, by means of false and fraudulent pretenses, representations, promises, and material omissions.

23. For the purpose of executing and attempting to execute the scheme and artifice to defraud described above, Defendant transmitted and caused to be transmitted by means of wire communication in interstate commerce, writings, signs, signals, pictures and sounds from the Northern District of Ohio, Western Division, and elsewhere, by using BLMGA's Facebook page to make public and private communications with other Facebook users, as alleged in paragraphs 9 through 16 herein.

All in violation of Title 18, United States Code, Section 1343.

COUNT 2

(Money Laundering, 18 U.S.C. § 1956(a)(1)(B)(i))

The Grand Jury further charges:

24. The factual allegations set forth in paragraphs 1 through 20 of this Indictment are realleged and incorporated as if fully rewritten herein.

25. On or about August 21, 2020, in the Northern District of Ohio, Western Division, and elsewhere, Defendant SIR MAEJOR PAGE, knowing that the property involved in the financial transaction of the wire transfer of \$108,499.83 from the BLMGA account ending in 7235 to Greater Metropolitan Title as payment for real property, to wit: a house and adjoining vacant lot on Glenwood Avenue and Maplewood Avenue, in Toledo, Ohio, represented the proceeds of some form of unlawful activity, knowingly and intentionally conducted and caused to be conducted the financial transaction designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of a specified unlawful activity, which was Wire Fraud, in violation of 18 U.S.C. § 1343, as alleged in Count 1, and the transaction involved the use of a financial institution engaged in and the activities of which affected interstate commerce, in that Defendant issued and caused to be issued the wire transfer from the BLMGA account in California.

All in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNT 3

(Money Laundering, 18 U.S.C. § 1957)

The Grand Jury further charges:

26. The factual allegations set forth in paragraphs 1 through 20 of this Indictment are realleged and incorporated as if fully rewritten herein.

27. On or about August 20, 2020, in the Northern District of Ohio, Western Division, and elsewhere, Defendant SIR MAEJOR PAGE, did knowingly engage in a monetary transaction, by, through, and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000; that is, Defendant caused a wire transfer in the amount of \$108,499.83 from BLMGA's Bank of America bank account in North Carolina to Greater Metropolitan Title Company, headquartered in Toledo, Ohio, such property having been derived from a specified unlawful activity, that is, Wire Fraud, in violation of Title 18, United States Code, Section 1343, as alleged in Count 1.

All in violation of Title 18, United States Code, Section 1957.

COUNT 4

(Money Laundering, 18 U.S.C. § 1957)

The Grand Jury further charges:

28. The factual allegations set forth in paragraphs 1 through 20 of this Indictment are realleged and incorporated as if fully rewritten herein.

29. On or about August 24, 2020, in the Northern District of Ohio, Western Division, and elsewhere, Defendant SIR MAEJOR PAGE, did knowingly engage in a monetary transaction, by, through, and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000; that is, Defendant caused a wire transfer to in the amount of \$11,481.00 from BLMGA Bank of America bank account in North Carolina, to a Furniture Palace in Toledo, Ohio, such property having been derived from a specified unlawful activity, that is, Wire Fraud, in violation of Title 18, United States Code, Section 1343, as alleged in Count 1.

All in violation of Title 18, United States Code, Section 1957.

FORFEITURE

The Grand Jury further charges:

30. The allegations of Counts 1 through 4 are hereby re-alleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c). As a result of the foregoing offense, SIR MAEJOR PAGE, Defendant herein, shall forfeit to the United States all property, real and personal, which constitutes, or is derived from, proceeds traceable to the commission of such offense; including, but not limited to, the following:

a.) \$263,318.37 seized pursuant to the execution of a federal seizure warrant on or about September 24, 2020, from Bank of America account number: **** * 7235, in the name of Black Lives Matter of Greater Atlanta, Inc. SIR MAEJOR PAGE is the signatory on the account.

b.) The real property located at 2057 Glenwood Avenue, Toledo, Ohio (Permanent Parcel Number: 01535013 – single family dwelling) and 2104 Maplewood Avenue, Toledo, Ohio (Permanent Parcel Number: 01535024 – vacant land behind 2057 Glenwood Avenue). SIR MAEJOR PAGE purchased the property on or about August 25, 2020, and titled it to Hi Frequency Ohio, an Ohio Corporation.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.