

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Hon. Leda Dunn Wettre  
 :  
 v. : Mag. No. 26-13078  
 :  
 PAUL RICHARD JOHNSON : **CRIMINAL COMPLAINT**

I, Daniella Ganiaris, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the Federal Bureau of Investigation ("FBI"), and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

continued on the attached page and made a part hereof.



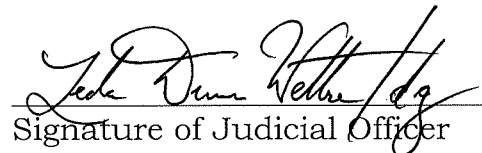
Daniella Ganiaris  
Special Agent  
Federal Bureau of Investigation

\*Agent Ganiaris attested to this Complaint by telephone pursuant to FRCP 4.1(b)(2)(A).

Sworn to and subscribed  
this 6<sup>th</sup> day of May, 2026

NEWARK, NEW JERSEY  
County and State

HONORABLE LEDA DUNN WETTRE  
UNITED STATES MAGISTRATE JUDGE

  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT 1**

**(Fraudulent Use of a Government Seal)**

In or about October 2024, in Bergen County, in the District of New Jersey and elsewhere, defendant

**PAUL RICHARD JOHNSON**

knowingly used, affixed and impressed upon a letter to an automotive manufacturer with corporate offices based in New Jersey dated October 15, 2024, a fraudulently made, forged, counterfeited and altered seal, and facsimile thereof, of a department and agency of the United States, namely, a seal of the United States Department of Justice.

In violation of Title 18, United States Code, Section 506(a)(2).

**ATTACHMENT B**

I, Daniella Ganiaris, a Special Agent with the Federal Bureau of Investigation (“FBI”), having personally participated in an investigation of the conduct of defendant PAUL RICHARD JOHNSON (“JOHNSON”), and having spoken with other law enforcement officers and individuals, have knowledge of the following facts. Because this Complaint is submitted for the limited purpose of establishing probable cause, I have not included all facts known to me concerning this investigation. The contents of documents and the actions, statements, and conversations of individuals referenced below are provided in substance and in part, unless otherwise indicated. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. At all times relevant to this Complaint:
  - a. JOHNSON was a resident of Miami, Florida. At no time had Johnson been employed by the United States Department of Justice (“DOJ”).
  - b. In approximately 2011, defendant JOHNSON was convicted in the Northern District of Illinois for the fraudulent use of a Government seal, in violation of Title 18, United States Code, Section 506(a)(2). As charged in Count One of the Information to which JOHNSON pled guilty, he had sent a letter dated December 6, 2006 to a certain automobile manufacturer (“Automobile Company 1”) bearing the seal of the DOJ even though he was not employed by the DOJ.
  - c. There was an automobile manufacturer with corporate offices based in, among other locations, Bergen County, New Jersey and central Ohio (“Automobile Company 2”).

2. Beginning in or around July 2024, JOHNSON began corresponding with Automobile Company 2 to try to resolve a dispute related to a delinquent balance on JOHNSON’s automobile lease. Due to the length of the delinquency, Automobile Company 2 had referred the matter to collections and wrote off JOHNSON’s debt, which ultimately resulted in JOHNSON receiving negative credit report entries.

3. In his correspondence, JOHNSON offered to pay his outstanding debt and requested that Automobile Company 2 take steps to repair his credit history. As is set forth more fully below, JOHNSON affixed the seal of the DOJ

to letters he sent to Automobile Company 2 to try to convince the company to resolve the dispute.

4. For example, on or about July 11, 2024, JOHNSON sent a letter to Automobile Company 2's corporate offices in central Ohio which featured the seal of the DOJ on the letterhead along with a heading of "US Department of Justice" underneath which was written the subheading "National Security Division." JOHNSON wrote this letter to complain that Automobile Company 2 had "reported me to all three credit bureaus for a loan write-off." Further, JOHNSON wrote that "DOJ's internal security team which monitors my, and other, personal information" had purportedly confirmed that Automobile Corporation 2 had reported a delinquency which had led to the notification of the three credit bureaus. JOHNSON indicated that he had accrued the debt because he had changed addresses several times and would like to arrange to repay his debt and have the delinquency removed. JOHNSON signed the letter underneath which he described his position as "Supervising Attorney, Criminal Division." He also listed an e-mail address which consisted of his name followed by "@usdoj.gov." JOHNSON was not at that time employed by the DOJ nor did the DOJ maintain an e-mail account on his behalf.

5. On or about August 8, 2024, JOHNSON wrote a second letter to Automobile Corporation 2's corporate offices in central Ohio wherein he referenced his earlier letter of July 11, 2024 which "outlines the confusion over the original write-off." This letter likewise included the DOJ seal as well as a heading of "US Department of Justice" underneath which was listed "National Security Division." In this August 8, 2024 letter, JOHNSON indicated that he had paid off the outstanding debt and was requesting that the "delinquency be removed." Beneath his signature, JOHNSON listed his position as "Assistant United States Attorney," and once again listed the same non-existent e-mail account consisting of his name followed by "@usdoj.gov."

6. On or about August 29, 2024, JOHNSON wrote a third letter to Automobile Corporation's corporate office in central Ohio which he addressed to the "Disputes Department." Once again, this letter included the DOJ seal as well as a heading of "US Department of Justice" underneath which was listed "National Security Division" as part of the letterhead. In the letter, JOHNSON acknowledged Automobile Corporation's "August 7<sup>th</sup> response to my August 3<sup>rd</sup> dispute," and stated that "[a]lthough it does not resolve my issue regarding the charge-off to the three credit reporting bureaus (CRBs), I believe this letter and my request to provide your bank routing information so that I can make a final payment will reverse that decision." As with the previous letter, JOHNSON listed his position as "Assistant United States Attorney," and yet again listed the same fictitious e-mail account consisting of his name followed by "@usdoj.gov." As part of the mailing, JOHNSON enclosed a number of items with the letter including what appears to be an off-center photocopy of JOHNSON's purported DOJ credentials with only a portion of those credentials visible. The photocopy

of these credentials shows a photograph of JOHNSON's face as well as a badge which is emblazoned with "US DEPT. OF JUSTICE" and the eagle insignia of the United States in the center of the badge's shield. The top of the badge above the shield consists of an eagle holding a banner in its beak which reads "ATTORNEY."

7. On or about October 15, 2024, JOHNSON wrote a fourth letter to Automobile Corporation 2's corporate offices in Bergen County, New Jersey. As with the three earlier letters, JOHNSON used a letterhead featuring the DOJ seal and referred to the "US Department of Justice" under which appeared the subheading "National Security Division." The letter was addressed to the General Counsel of Automobile Corporation 2's North American division, and the letter began with the following sentence: "My name is Paul Johnson." JOHNSON then rehashed many of the statements and requests from his earlier two letters. In the concluding paragraph, JOHNSON wrote that "[i]f there is anything you can do to facilitate an alternative outcome, I can categorically state that your actions will be looked upon both favorably by me, including but not limited to, the 94 other US Attorneys' offices." Beneath his signature, JOHNSON listed his occupation as "Assistant United States Attorney," and listed the same fake e-mail account consisting of his name followed by "@usdoj.gov." At the time JOHNSON mailed this letter – which was stamped "RECEIVED" by Automobile Corporation 2's New Jersey corporate offices on or about October 21, 2024 - he held no employment with the DOJ and had never been an Assistant United States Attorney.