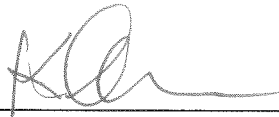


Approved: 
KIERSTEN A. FLETCHER
JESSICA K. FENDER
Assistant United States Attorneys

Before: THE HONORABLE FRANK MAAS
United States Magistrate Judge
Southern District of New York

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UNITED STATES OF AMERICA : SEALED COMPLAINT
- v. - : Violations of 18 U.S.C.
§§ 514, 912, 1343, and 2
BRANDON JONES, :
a/k/a "Brandon McGeer," : COUNTY OF OFFENSE:
a/k/a "Brandon Jones-McGeer," : NEW YORK
Defendant. :

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SOUTHERN DISTRICT OF NEW YORK, ss.:

ASHLEY L. BOROFSKY, being duly sworn, deposes and says that she is a Postal Inspector with the United States Postal Inspection Service ("USPIS") and charges as follows:

COUNT ONE
(Impersonating an Officer or Employee of the United States)

1. From at least in or about November 2015 up to and including at least July 2016, in the Southern District of New York and elsewhere, BRANDON JONES, a/k/a "Brandon McGeer," a/k/a "Brandon Jones-McGeer," the defendant, falsely assumed and pretended to be an officer and employee acting under the authority of the United States and a department, agency and officer thereof, and acted as such, and in such pretended character demanded and obtained money and things of value, to wit, JONES claimed to be a Commissioner with the Office of the Commissioner, an organization associated with the United States government.

(Title 18, United States Code, Sections 912 and 2.)

COUNT TWO
(Wire Fraud)

2. From at least in or about November 2015 up to and including at least in or about July 2016, in the Southern District of New York and elsewhere, BRANDON JONES, a/k/a "Brandon McGeer," a/k/a "Brandon Jones-McGeer," 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 communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit, JONES sent emails falsely representing that he was a government official and attaching purchase orders for the purpose of obtaining things of value, including accommodations.

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

COUNT THREE
(Conspiracy to Commit Wire Fraud)

3. From at least in or about November 2015 up to and including in or about July 2016, in the Southern District of New York and elsewhere, BRANDON JONES, a/k/a "Brandon McGeer," a/k/a "Brandon Jones-McGeer," the defendant, and others known and unknown, willfully and knowingly, did combine, conspire, confederate, and agree together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

4. It was a part and object of the conspiracy that BRANDON JONES, a/k/a "Brandon McGeer," a/k/a "Brandon Jones-McGeer," the defendant, and others known and unknown, 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, would and did transmit and cause 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, in violation of Title 18, United States Code, Section 1343.

(Title 18, United States Code, Section 1349.)

COUNT FOUR
(Fictitious Obligations)

5. From at least in or about November 2015 up to and including at least in or about July 2016, in the Southern District of New York and elsewhere, BRANDON JONES, a/k/a "Brandon McGeer," a/k/a "Brandon Jones-McGeer," the defendant, willfully and knowingly, and with intent to defraud, did draw, print, process, produce, publish and otherwise make, and attempt and cause the same, within the United States, a false and fictitious instrument, document, and other item appearing, representing, purporting, and contriving through scheme and artifice, to be an actual security and other financial instrument issued under the authority of the United States, a foreign government, a State, and other political subdivision of the United States, and an organization, to wit, JONES created and tendered false and fictitious purchase orders and government travel requests purporting to be issued under the authority of the United States government.

(Title 18, United States Code, Sections 514 and 2.)

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

6. I am a Postal Inspector with the USPIS. My duties and responsibilities include the investigation of fraud offenses including wire fraud and mail fraud. The information contained in this affidavit is based upon my personal knowledge and my review of documents and records gathered during the course of this investigation, as well as information obtained, directly or indirectly, from other sources. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all of the facts that I have learned during the course of the 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 of the Investigation

7. Based on my participation in this investigation, I have become familiar with an organization known as the "Office of the Commissioner, An IGO" (the "Organization"). The Organization purports to be an intergovernmental organization with the United Nations (the "UN") and the United States

government, which "promotes international peace and security," among other goals.

8. The Organization has a publicly accessible website, accessible at www.ocaun.org (the "Organization's website"). At all times relevant to this Complaint, the Organization's website listed a group of "Constitutionally Affirmed Executive Principals." BRANDON JONES, a/k/a "Brandon McGeer," a/k/a "Brandon Jones-McGeer," the defendant, is represented as having been "Appointed & Affirmed" as the "Commissioner and Head of Delegation" of the Organization; the Organization's website also includes a photograph of JONES in which he appears to wear an official uniform.

9. Based upon my participation in this investigation, my conversations with other law enforcement officers involved in this investigation, and my review of reports prepared by those officers, I have learned that the Organization is not affiliated with the UN or the United States government. Instead, BRANDON JONES, a/k/a "Brandon McGeer," a/k/a "Brandon Jones-McGeer," the defendant, together with others known and unknown, operates the Organization as a means to defraud various businesses. As set forth in more detail below, this fraud is perpetrated through the use of fake government purchase orders, government travel requests, and other documents that JONES and others tender to businesses in exchange for goods or services.

10. Law enforcement officials have confirmed with the UN that BRANDON JONES, a/k/a "Brandon McGeer," a/k/a "Brandon Jones-McGeer," the defendant, is not employed in any capacity by, nor is he officially associated with any Member State of, the UN.

11. Law enforcement officials have confirmed with the Diplomatic Security Service that BRANDON JONES, a/k/a "Brandon McGeer," a/k/a "Brandon Jones-McGeer," the defendant, does not have any diplomatic status in the United States and is not employed by or associated with the Department of State in any way.

The Organization's Fraud

12. Based on my review of records obtained from an international electronics retailer (the "Electronics Store"), conversations with an employee of the Electronics Store (the

"Delaware Store Employee"), and review of email communications¹ involving BRANDON JONES, a/k/a "Brandon McGeer," a/k/a "Brandon Jones-McGeer," the defendant, I have learned, among other things, the following:

a. On or about November 10, 2015, JONES emailed a representative of a branch of the Electronics Store located in New York, New York, (the "New York Store"), asking to "officially place an order" for various electronic products, and attaching a purported government purchase order (the "Purchase Order").

b. The Purchase Order, which is signed by "Dr. Brandon Jones, Commissioner," purports to authorize the purchase of up to \$25,000 in products from the Electronics Store. The Purchase Order bears a stamp purporting to be an "Official Seal" of the Organization, and provides a "Federal Exempt" number. The Purchase Order also instructs the bearer to send two copies of the Purchase Order to the "Department of Finance Government Services," and provides an associated email address.

c. On or about November 18, 2015, JONES emailed the New York Store, stating in part that he was enclosing "a copy of the U.S Department of State Streamed-lined tax exemption form." JONES attached a document entitled "Certificate of Exemption" which listed the Organization as the purchaser of the goods (the "Tax Exemption Form"). The Tax Exemption Form indicates that the Organization is associated with the Federal government via the "U.S Dep-Of State."

d. Based upon these representations and others, on or about November 20, 2015, the New York Store provided the Organization with over \$22,000 worth of electronic goods.

e. On or about November 29, 2015, JONES and a co-conspirator not charged herein entered a branch of the Electronics Store located in Newark, Delaware, and presented a document purporting to be a United States government-issued purchase order, similar in appearance to the Purchase Order described in Paragraph 13(b), as payment for electronics products. JONES told the Delaware Store Employee that he had previously used such purchase orders to purchase goods from the Electronics Store.

¹ All email communications referenced herein were obtained pursuant to judicially authorized search warrants.

f. To date, JONES and other members of the Organization have obtained approximately \$60,000 in products from the Electronics Store by presenting alleged government purchase orders similar to those described above at various branch locations of the Electronics Store throughout the United States.

13. Based on my review of law enforcement records, records obtained from a commercial airline (the "Airline"), communications with employees of the Airline (the "Airline Employee"), and records from the Queens County District Attorney's Office, I have learned, among other things, the following:

a. On or about March 27, 2016, BRANDON JONES, a/k/a "Brandon McGeer," a/k/a "Brandon Jones-McGeer," the defendant, and a second co-conspirator not charged herein approached the Airline's ticket counter at LaGuardia Airport and presented a document entitled "Government Travel Request" as payment for airline tickets. The Airline Employee issued the tickets to JONES, but reported JONES's request to, among others, the Airline's security team, who, in turn, flagged the tickets that were issued to JONES.

b. On or about March 29, 2016, JONES presented an Airline ticket he had obtained prior to March 27, 2016 by use of a fraudulent Government Travel Request at LaGuardia Airport. The Airline alerted New York/New Jersey Port Authority Police (the "Port Authority Police"), who arrested JONES.

c. Following that arrest, JONES told the Port Authority Police, among other things, that JONES is employed by the Organization, and that he resides at 845 United Nations Plaza in New York, New York.

d. In connection with JONES's arrest, the Port Authority Police contacted the UN and learned that JONES had no affiliation with the UN and had been barred from entering or remaining on UN property.

e. The Property Manager of 845 United Nations Plaza in New York, New York has confirmed that neither JONES nor the Organization are residents of that property.

f. On or about May 4, 2016, JONES pleaded guilty to petit larceny, in violation of New York Penal Law Section 155.25, a Class A misdemeanor, in relation to the Government Travel Requests submitted to the Airline.

g. To date, the Airline has identified over \$100,000 in tickets purchased by JONES or other members of the Organization using fraudulent Government Travel Requests.


14. Based on my conversations with a salesperson (the "Salesperson") at a New York City-based long-term apartment rental facility (the "Rental Company") as well as my review of communications between BRANDON JONES, a/k/a "Brandon McGeer," a/k/a "Brandon Jones-McGeer," the defendant, and the Salesperson, I have learned, among other things, the following:

a. On or about June 10, 2016, the Salesperson emailed JONES in response to an inquiry JONES submitted to the Rental Company's website regarding a potential long-term apartment rental. In response, JONES sent an email claiming that the rental was "for official and Governmental Business" and that the "budget for ... this request is 8900.00USD and would not be based upon my personal credit but the Government's." The email was signed "Dr. Brandon Jones, Commissioner & Head Of Delegation."

b. The Salesperson subsequently sent JONES a questionnaire requesting additional information. On or about June 13, 2016, JONES emailed a reply in which JONES indicated that he would reside in the apartment, and that rent would be paid by the "Department of Treasury." JONES also provided the Salesperson with a purchase order number and indicated that he would provide a separate Tax Exemption number.

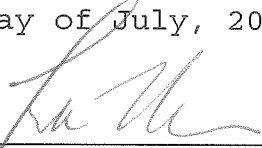
15. Based on my review of email communications from BRANDON JONES, a/k/a "Brandon McGeer," a/k/a "Brandon Jones-McGeer," the defendant, as well as my communications with an email hosting service (the "Hosting Service"), I have learned that the Hosting Service hosts the email accounts used by JONES (the "JONES Accounts") in connection with the communications referenced in this Complaint. I have also learned that email communications sent or received by the JONES Accounts are transmitted through servers maintained by the Hosting Service outside the State of New York.

WHEREFORE, deponent prays that an arrest warrant be issued for BRANDON JONES, a/k/a "Brandon McGeer," a/k/a "Brandon Jones-McGeer," the defendant, and that he be arrested and imprisoned or bailed, as the case may be.



ASHLEY L. BOROFSKY
Postal Inspector
United States Postal Inspection
Service

Sworn to before me this
13th day of July, 2016



THE HONORABLE FRANK MAAS
United States Magistrate Judge
Southern District of New York