

UNITED STATES DISTRICT COURT
for the
Northern District of Ohio

FILED
6:49 pm Sep 24 2020
Clerk U.S. District Court
Northern District of Ohio
Toledo

United States of America
v.
Sir Maejor Page aka Tyree Conyers-Page

Case No.
3:20MJ5291

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 2020- September 24, 2020 in the county of Lucas in the
Northern District of Ohio, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Rows include 18 U.S.C. 1343 (Wire Fraud), 18 U.S.C. 1956(a)(1)(B)(i) (Money Laundering), and 18 U.S.C. 1957(a) (Money Laundering).

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet.

Handwritten signature of Matthew Desorbo

Complainant's signature

Matthew Desorbo, Special Agent FBI

Printed name and title

Sworn to via telephone after submission by reliable electronic means. Fed. R. Crim. P. 3, 4(d), and 4.1.

Date: 09/24/2020

Handwritten signature of James R. Knepp, II

Judge's signature

City and state: Toledo, OH

James R. Knepp, II, U.S. Magistrate Judge

Printed name and title

1956(a)(1)(B)(i)- Money Laundering; and 1957(a)- Money Laundering have been committed by SIR MAEJOR PAGE.

PROBABLE CAUSE

A. Background

5. In April 2019, a Cooperating Witness (CW1), submitted a complaint to the FBI's National Threat Operations Center that SIR MAEJOR PAGE was fraudulently utilizing a Black Lives Matter non-profit organization by way of misrepresentations to make money.

6. On June 1, 2020, CW1 provided supplementary information that PAGE was receiving money derived from fundraisers on a Facebook page titled "BLACK LIVES MATTER OF GREATER ATLANTA" (BLMGA). CW1 provided screenshots from the publicly viewable Facebook page of BLMGA that show multiple people donating to this organization. According to the screenshots taken by CW1, from approximately May 25 to May 31, 2020, over \$19,000 was raised for BLMGA.

7. As a result of the complaint filed by CW1, and the subsequent documentation provided, the FBI attempted to verify the legitimacy of CW1's claims through numerous law enforcement techniques.

8. In March 2016, PAGE registered a 501(c)(3) domestic non-profit corporation with the Georgia Secretary of State Corporation's Division called "BLACK LIVES MATTER OF GREATER ATLANTA INC." PAGE assumed the role of president and CEO of the corporation. In addition, PAGE registered his corporation as a tax exempt 501(c)(3) charity with the Internal Revenue Service (IRS).

9. To further his organization, PAGE made a BLMGA Facebook page. FBI confirmed PAGE used his personal Facebook account with display name "Sir Maejor Page,"

Facebook ID _____ to register Facebook username “blmgaonline” with the display name “Black Lives Matter of Greater Atlanta,” Facebook ID _____

10. The BLMGA Facebook page had the following email addresses assigned to it:

@facebook.com, _____ .com, and

@gmail.com.

11. Additionally, PAGE provided documentation to Facebook which detailed BLMGA’s non-profit status. Facebook recognized BLMGA as a non-profit organization thereby allowing users to make donation directly to BLMGA through Facebook and having BLMGA appear alongside legitimate charities in search results.

12. On 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. PAGE was notified via US Mail, per IRS policy, of the revocation in or around August 2019. Similarly, on August 26, 2019 the Georgia Secretary of State Corporations Division administratively dissolved BLMGA’s non-profit corporation for failure to file necessary paperwork. PAGE did not notify Facebook of these revocations or ask that Facebook no longer display BLMGA as a non-profit organization. The FBI confirmed that BMLGA remained listed as a non-profit organization on Facebook as recently as September 18, 2020. As of the same date, BLMGA is also listed as a non-profit organization with the fundraising website Go Fund Me.

13. BLMGA’s non-profit Facebook page was linked to a _____ account ending in 7235 named, “Black Lives Matter of Greater Atlanta, Inc.” This bank account was opened in April 2018 and PAGE was the only signatory on the account. From April 2018 until May 2020, this bank account’s balance ebbed and flowed; however, it never had a balance that exceeded \$5,000. The beginning balance of this account as of May 2020 was negative \$12.42.

B. Influx of donations

14. In June 2020, PAGE used the BLMGA handle to make statements by private messages to other Facebook users. He told at least four other users that the funds donated were being used to fight for George Floyd and told at least one user that none of the “funds have been used for personal items. All movement related.” Additionally, PAGE reposted news articles documenting civil unrest to the public BLMGA page.

15. In June 2020, BLMGA’s Facebook page received approximately \$36,493.80 in donations. In July 2020, it received approximately \$370,933.69, and in August 2020, it received an additional \$59,914.69. All of this money was transferred from Facebook to BLMGA’s account ending in 7235.

C. Personal Spending of Donations

16. The FBI tracked PAGE’s spending from this account and found PAGE used these donations for his own personal use.

17. In June, July, and August 2020, PAGE repeatedly used a debit card ending in 3846 linked to the BLMGA account. He used the debit card to make purchases related to food, dining, entertainment, clothing, furniture, and a home security system.

18. Specifically, on July 20, 2020, PAGE purchased a doorbell camera and a six camera security system totaling \$1,310. On July 27, 2020, PAGE purchased tailored suits and accessories totaling \$2,065.

19. On August 24, 2020, PAGE utilized debit card ending in 3846 to make purchases at: Furniture Palace totaling \$12,542.70; Home Depot totaling \$2,125.67; and Walmart totaling \$3,706.73. On August 27, 2020, PAGE made another purchase at Walmart totaling \$1,413.52.

20. Throughout this time frame, PAGE routinely transferred funds from the BLMGA account to a personal cash application identified as: "maejorpage," via Square [Cash] App; and "SIR MAEJOR," via CASH App. In June and July 2020, he transferred approximately \$8,281.00 to these applications. Similarly, in August 2020 he transferred approximately \$5,212 to these applications.

21. PAGE spent the largest sum of this donation money on the purchase of a personal residence located in Toledo, Ohio. On August 27, 2020, the FBI queried the Lucas County Auditor's Office website which showed Hi-Frequency Ohio (HFO)¹ purchased a property located on Glenwood Avenue, Toledo, Ohio and a vacant lot directly behind it located on Maplewood Avenue, Toledo, Ohio. The total purchase price for both properties was approximately \$112,000. The closing statement for the property purchase showed a balance due from HFO of \$108,499.83. This balance was paid by a single wire transfer from the BLMGA bank account on August 21, 2020 to Greater Metropolitan Title.

22. PAGE attempted to conceal his ownership of this property by having an identified individual, serving as the general counsel and treasurer of HFO, sign the purchase documents for the property and present a non-disclosure agreement to the selling agent.² Specifically, the non-disclosure agreement stated that the agreement was to be entered "by and between Hi Frequency Ohio via Sir Maejor Page" and the seller's agent.

¹ HFO is a Toledo based group lead by PAGE with the stated mission to fight for the lives of marginalized communities. According to the Ohio Secretary of State Business Records, PAGE is the CEO of HFO.

² Based on the affiant's training and experience, the inclusion of a non-disclosure agreement is not normal practice with regards a real estate transaction concerning the purchase of a residential property. The effect of this non-disclosure agreement appears none other than to be PAGE's continued effort to conceal or disguise the nature of the transaction and origin of the funds to support it.

23. Since the purchase, PAGE has indicated publicly and in government documents that his residence is the house on Glenwood Avenue. On August 31, 2020, PAGE went to a licensed firearms dealer in Oregon, Ohio. PAGE wanted to purchase a pistol and two rifles. On the Alcohol, Tobacco, Firearms, and Explosive 4473 form PAGE listed his address as on Glenwood Avenue, Toledo, Ohio.

24. On August 17, 2020, PAGE opened a personal checking account ending in 9448. Between August and September 2020, PAGE moved \$4,500.00 from the BLMGA bank account to this personal bank account. There is no other source of money in this account other than this transfer from BLMGA's account. On September 1 and September 8, 2020, PAGE used his personal account to conduct two transactions at a licensed firearms dealer in Oregon, Ohio totaling \$2,914.18 for the purchase of the above described pistol and two rifles.

25. Furthermore, on September 1, 16, 23, and 24, 2020, FBI physical surveillance observed PAGE at the house on Glenwood Ave, Toledo, Ohio. On September 16, 2020 PAGE was observed accepting a UPS delivery at that address.

26. In sum, PAGE has spent over \$200,000 on personal items generated from donations received through BLMGA Facebook page with no identifiable purchase or expenditure for social or racial justice.

D. PAGE's Statements

27. Throughout July and August 2020, PAGE livestreamed and posted to his personal Facebook (not the BLMGA Facebook page) multiple videos of himself wherein he appeared to be sharing newly purchased clothing, hotel rooms, and office space in the Atlanta area. PAGE also appeared to be attempting to respond to questions about his new affluence. PAGE falsely stated that he is employed by a law firm.

28. In a video posted on or about July 24, 2020, PAGE interacted with an unidentified male (UIM) at what appears to be a bar or club in Atlanta, GA. The UIM asked where PAGE has been and PAGE replied, “making money.” PAGE then attempted to obscure the video from the phone and is heard stating a comment to the effect of: when you get a \$300,000 (inaudible), you know you’re doing good.

29. PAGE was additionally observed making a comment that highlights his financial gain. In a video recorded on or about July 27, 2020, PAGE is riding in an SUV with a UIM that PAGE references to be his “security.” The UIM told PAGE that he needs to be more humble and that PAGE was reckless during a previous visit to a bar in the Atlanta area. The UIM told PAGE “you better learn the lieutenants and generals in your city.” PAGE replied, “the general stepped on my shoes . . . black lives matter all day but don’t step on my god damn shoes.”

30. In a video posted on or about August 7, 2020, PAGE stated “I work for a dope ass law firm, they pay me well...well...really well.” In a video posted on or about August 11, 2020, PAGE continued to flaunt his financial gain, “they say he gets money this way- you don’t know how I get mother fucking money, because if I showed you my account, you would kill yourself, if I showed you *my* account you’d kill yourself.” “I could buy you, your daddy, your mammy, and your bitch...I mean if we are talking numbers...I’m wearing tailored suits, nice cufflinks, 100 dollar ties...I’m sorry 150 dollar ties...”

31. In the same video, taken on or about August 11, 2020, PAGE showed the entrance to a building the FBI has identified as the Marriott Marquis in Atlanta, Georgia. PAGE commented, “these are the types of buildings I’m walking into every fucking day.” PAGE continued, “let me tell you the difference between me and a lot of mother fuckers...they still back in Toledo, can’t catch a flight when they feel like it, can’t make a phone call to get what

they want, can't call 400 people to show up at any given time...they don't have access to capital, they don't have access to the attorneys." PAGE then walked into the hotel filming the interior of the lobby and stated, "my room way up at the top...at the top top." PAGE then lowers the camera to show the lower levels and stated, "they put the bottom feeders on these floors...my room all the way to the top cause I'm bougie...there aint never gonna be a nigga like me."

32. PAGE is unemployed and has no other known sources of income other than from BLMGA bank account.

E. Facebook Users Questioned BLMGA's Legitimacy

33. After BLMGA's Facebook donation significantly increased in May 2020, PAGE posted on June 2, 2020, "We said it once and we will say it again BLMGA is no longer a non-profit org we are a social media grass roots org." Despite this public pronouncement, PAGE never attempted to remove BLMGA from Facebook's listing of non-profit organization.

34. Several Facebook users replied to this post questioning BLMGA's authenticity. FB user 1 posted, "How are you affiliated with BLM in ATL? Who are the people behind this page?" No response was publicly posted from BLMGA.

35. FB user 2 posted: "Where are you located?? On the BLM website there is not Atlanta Georgia Chapter" No response was publicly posted from BLMGA.

36. FB user 3 posted: "i say this to 'BLM of greater atlanta'-you are co-opting the name/title 'BLM' to trick people into donating money to you. they think you are BLM. you are not BLM. you are a scam. you need to change the name of your for-profit company." No response was publicly posted from BLMGA.

37. In reply to the comment posted by FB user 3, FB user 1 posted, "I hope the organizers of this page respond to you because I have the same concern."

38. FB user 3 also messaged several individuals whom had presumably donated to BLMGA fundraiser advising them, "I just found out this is possibly a fake page!!...i messaged them with a complaint that i had set up donations thinking they were indeed black lives matter. i havent heard back."

39. CW1 stated that the above described comments were removed from the BLMGA Facebook page without any answers.

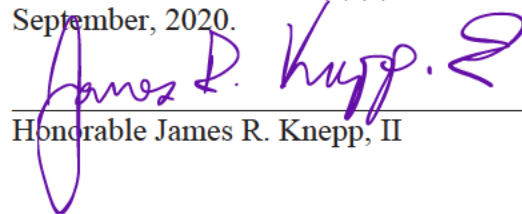
CONCLUSION

52. Based on the foregoing, your Affiant respectfully submits that there is probable cause that SIR MAEJOR PAGE has violated Title 18 U.S.C. §§ 1343- Wire Fraud; 1956(a)(1)(B)(i)- Money Laundering; and 1957(a)- Money Laundering.



Special Agent Matthew Desorbo (FBI)

Subscribed and sworn to me telephonically after submission by reliable electronic means, pursuant to Fed.R.Crim.P. 4.1 & 41(d)(3), this 24th day of September, 2020.



Honorable James R. Knepp, II