

SEALED

**FILED IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

OCT 20 2016

CLERK, U.S. DISTRICT COURT  
By UNITED STATES OF AMERICA  
Deputy *MCC*

v.

NO. 3:16-MJ-840-BH

**WILLIAM LAURENCE STANLEY**

**CRIMINAL COMPLAINT**

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

Between at least on and about September 6, 2016 and continuing through at least on or about September 28, 2016, in the Dallas Division of the Northern District of Texas and elsewhere, defendant **William Laurence Stanley** with the intent to retaliate, took an action harmful to a person that interfered with the lawful employment and livelihood of a person, for providing to a law enforcement officer truthful information relating to the commission of a Federal offense, in that **Stanley** posted derogatory comments and reviews online about the victim in the Northern District of Texas cause 3-14-CR-00113-N.

In violation of 18 U.S.C. § 1513(e).

This criminal complaint is based on the facts set out in the attached affidavit.

*Jason Ibrahim*  
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Jason Ibrahim  
Special Agent  
Federal Bureau of Investigation

Sworn to before me and signed in my presence in Dallas, Texas, on October 20, 2016

*Irma C. Ramirez*  
\_\_\_\_\_  
IRMA C. RAMIREZ  
UNITED STATES MAGISTRATE JUDGE

**AFFIDAVIT**

I, Jason Ibrahim, a Special Agent with the Federal Bureau of Investigation, being duly sworn, depose and state as follows:

**INTRODUCTION**

1. Affiant, Jason Ibrahim, is a Special Agent with the Federal Bureau of Investigation (FBI) assigned to the FBI's Dallas Violent Crimes Task Force (DVCTF). As part of the DVCTF, Affiant investigates several federal crimes, including bank robberies, commercial robberies, extortions, and kidnappings. Affiant has been a Special Agent with the FBI for over 14 years and has been assigned to the DVCTF since approximately July 2013. This affidavit is made in support of a criminal complaint against William Laurence Stanley, a white male born on XX/XX/1962. This affidavit is based on Affiant's personal knowledge as well as on information provided by other law enforcement officers and other individuals who have participated in or who have knowledge of this investigation. Since this affidavit is being submitted for the limited purpose of establishing probable cause for a criminal complaint, Affiant has not included each and every fact known concerning this investigation.

### OVERVIEW

1. The Federal Bureau of Investigation (FBI) is currently investigating William Laurence Stanley for retaliating against a witness, victim, or informant, in violation of 18 U.S.C. § 1513(e).<sup>1</sup>

### FACTS

2. On or about January 14, 2016, in the case entitled *United States v. Stanley, et al*, Case # 3-14-CR-00113-N, defendant William Laurence Stanley was sentenced to 37 months of imprisonment, three years of supervised release, restitution in the amount of \$174,888.85, and a mandatory special assessment of \$100 following his guilty plea to Hobbs Act-Extortion, in violation of 18 U.S.C. § 1951(a). Stanley's conviction stemmed from his and his sister Lynn Faust's online and telephone threats in 2013 through 2014 to ruin the reputation of the Dallas-based company (referred to herein as GE) if GE refused to pay Stanley approximately \$29,556.20. Stanley threatened to post negative things online about GE, which had the potential to cause GE to lose approximately \$100,000-\$200,000 per week in revenue. Stanley's search engine optimization (SEO) skills caused any items he posted online to rank high on the various search engines. During the early stages of the extortion in 2014, GE notified the Dallas office of the FBI, which initiated an investigation into Stanley's conduct. To further the investigation, several GE officers

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<sup>1</sup> 18 U.S.C. § 1513(e) provides that "[w]hoever knowingly, with the intent to retaliate, takes any action harmful to any person, including interference with the lawful employment or livelihood of any person, for providing to a law enforcement officer any truthful information relating to the commission or possible commission of any Federal offense, shall be fined under this title or imprisoned not more than 10 years, or both."

and employees subsequently provided truthful information to the FBI regarding Stanley's commission of a federal offense, that being violations of 18 U.S.C. §§ 1951(a), the offense to which Stanley ultimately pled guilty.

3. On or about August 8, 2016, after serving the majority of his imprisonment term, the United States Bureau of Prisons (BOP) transferred Stanley to a halfway house called the Leidel Residential Re-Entry Center located at 1819 Commerce Street, Houston, Texas. On or about September 6, 2016, the BOP placed Stanley on home confinement at a residence located on Shady Oaks Drive in Angleton, Texas, which, according to available law-enforcement databases, is the residence of Stanley's daughter (referred to herein as SS).

4. On or about September 21, 2016, a review/blog about GE was posted on www.yelp.com, whose author was listed as "William S., Angleton, TX." In the review, the author further identified himself as "William L. Stanley" and discussed black-hat SEO work which GE purportedly paid him to perform in the past against some of GE's competitors. The review had a link to a blog at www.wordpress.com, which had a header and footer entitled "G[redacted] E[redacted] Complaints, R[redacted] B[redacted], J[redacted] B[redacted], and D[redacted] B[redacted]." "The Acquisition Scam Exposed!"<sup>2</sup> with a sub-header of "The Acquisition Scam: We Have a Buyer For Your Company! Pay Fees Upfront. Got Scammed?" The blog had links to approximately 67

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<sup>2</sup> JB is the Chairman/Chief Executive Officer (CEO) of GE, and RB is GE's President.

articles/blogs/complaints which were intended to portray GE in a bad light. Several of the articles/blogs/complaints had titles and photographs added to them to place GE in a more negative light. Samples of the added headlines, some of which merely reposted content from the body of the article/blog/complaints, included, among other headlines, the following: “100% total scam. G[redacted] e[redacted] complaints”; “The whole thing is a SCAM. . . .”; and “Acquisition Scam: G[redacted] E[redacted] People”.

5. That same day, a negative workplace review of GE was posted on www.glassdoor.com, wherein the author claimed to be a “former employee.” The review, which included comments of “Doesn’t Recommend,” “Negative Outlook,” and “Disapproves of CEO,” stated:

**Pros[:]** Easy money. Had to do a lot of illegal stuff. I cannot put a link here but there is a wordpress blog with a LOT of information[.] Just google “g[redacted] E[redacted] Truth” and it will all come up. **Cons[:]** To[o] many to mention here. Probably Jail. I know the FBI is interested because I talked to them about it.  
**Advice to Management[:]** Run

6. That same day, an individual utilizing a username of “G[redacted]truth,” posted a derogatory blog about GE, very similar if not identical to the blogs on www.yelp.com and www.wordpress.com, in a thread on the website www.shaggytexas.com. The blog was entitled “G[redacted] E[redacted] Truth,” and the author identified himself as “William L Stanley.” In subsequent postings on that same thread, the author, among other things, provided the uniform resource locator (URL) address for the blog about GE at www.wordpress.com, referred to GE’s business model

as an “Acquisition Scam,” and encouraged others to duplicate the negative content about GE online in as many places as possible.

7. On or about September 24, 2006, the BOP had Stanley return to the halfway house. On or about September 28, 2016, the individual with the username “G[redacted]truth” made two more postings to the same thread on www.shaggytexas.com at approximately 4:27 a.m. and 4:38 a.m., wherein the individual stated that he wanted to tell his side of the story and get the “truth told.”

8. Due to the early-morning hours of the posts and the fact that Stanley was supposed to be at the halfway house at the time, Affiant contacted the director of Stanley’s halfway house to determine if Stanley could have made those posts. The director explained that the halfway house had a room where residents had monitored internet access but that the room was not open or accessible at the time the early-morning posts were made. When asked if it were possible that Stanley had a cellular telephone with internet access, the director explained that the halfway house’s regulations prohibited residents from having them and that it would be considered contraband if Stanley had one. Later that same day, the halfway house’s chief of security searched Stanley pursuant to halfway-house rules and regulations and located a smart phone in a pocket on Stanley’s person. When the chief of security seized the smart phone, Stanley remarked, “They owe me some money. I didn’t do anything wrong.”

9. The FBI subsequently served a subpoena on www.wordpress.com to obtain information about the derogatory blog about GE found at that website. The subpoena

results indicated, among other things, the following: (1) that site's URL address was g[redacted]e[redacted]truth.wordpress.com; (2) that the site was created on September 15, 2019, at approximately 2:50 p.m. Coordinated Universal Time (UTC), a time during which Stanley was on home confinement at SS's residence on Shady Oaks Drive in Angleton, TX; and (3) the internet protocol (IP) address captured at the time the site was created was 104.56.61.214.

10. An initial check of IP address 104.56.61.214 indicated that it resolved to an AT&T IP address. Subpoenaed AT&T records subsequently indicated that the listed subscriber for that IP address at the date and time the www.wordpress.com site at issue was created was SS at the Shady Oaks Drive, Angleton, Texas address.

11. The recent derogatory online postings about GE were initially brought to the attention of the FBI by an attorney retained by GE on the matter. The FBI interviewed the attorney, who indicated that GE had already lost two sales as a result of the online postings with a consequent loss of revenue of approximately \$75,000. The attorney also stated that the derogatory online postings had the potential to cost GE approximately \$50,000 per day in revenue.

### CONCLUSION


12. Based on the foregoing facts and circumstances, Affiant believes there is probable cause showing that William Laurence Stanley, a white male born on XX/XX/1962, has violated 18 U.S.C. § 1513(e), which criminalizes retaliation against a

witness, victim, or an informant who provides truthful information to a law enforcement officer about the commission or possible commission of a federal offense.

Respectfully submitted,

  
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JASON IBRAHIM  
Special Agent, FBI

Subscribed and sworn to before me on the 20<sup>th</sup> day of October, 2016.

  
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IRMA C. RAMIREZ  
United States Magistrate Judge