

Mod AO 442 (09/13) Arrest Warrant AUSA Name & Telno: Alex Rossmiller/Ryan Finkel, 212-637-2415/-6612

UNITED STATES DISTRICT COURT

for the

Southern District of New York

United States of America

v.

JOHN PIERRE DUPONT,
a/k/a "John Gary Rinaldo,"
a/k/a "John Gary,"

3D,LA@3 53E7 @A, #+Z##) +? <

Case No. 19 Mag.

19MAG . 2493

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) JOHN PIERRE DUPONT, a/k/a "John Gary Rinaldo," a/k/a "John Gary,"
who is accused of an offense or violation based on the following document filed with the court:

- Indictment, Superseding Indictment, Information, Superseding Information, Complaint, Probation Violation Petition, Supervised Release Violation Petition, Violation Notice, Order of the Court

This offense is briefly described as follows:

Wire fraud (18 U.S.C. § 1343, and 2)
Aggravated Identity Theft (18 U.S.C. § 1028A, and 2)

Date: 03/13/2019

City and state: New York, New York

Handwritten signature of Gabriel W. Gorenstein

Issuing officer's signature

Hon. Gabriel W. Gorenstein, U.S. Chief Magistrate Judge

Printed name and title

Return

This warrant was received on (date) , and the person was arrested on (date)
at (city and state)

Date:

Arresting officer's signature

Printed name and title

Approved: Alex Rossmiller / Ryan Finkel  
ALEX ROSSMILLER / RYAN FINKEL  
Assistant United States Attorneys

Before: THE HONORABLE GABRIEL W. GORENSTEIN  
United States Magistrate Judge  
Southern District of New York

19MAG 2493

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	:	<b><u>SEALED COMPLAINT</u></b>
UNITED STATES OF AMERICA	:	
	:	
- v. -	:	Violations of
	:	18 U.S.C. §§ 1343,
JOHN PIERRE DUPONT,	:	1028A, and 2
a/k/a "John Gary Rinaldo,"	:	
a/k/a "John Gary,"	:	COUNTY OF OFFENSE:
	:	NEW YORK
Defendant.	:	
	:	
----- x	:	

SOUTHERN DISTRICT OF NEW YORK, ss.:

JEREMY ROSENMAN, being duly sworn, deposes and says that he is a Special Agent with the United States Attorney's Office, Southern District of New York, and charges as follows:

COUNT ONE  
(Wire Fraud)

1. From in or about 2015, up to and including in or about March 2019, in the Southern District of New York and elsewhere, JOHN PIERRE DUPONT, a/k/a "John Gary Rinaldo," a/k/a "John Gary," 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, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit, DUPONT participated in a scheme to obtain money from victims who believed they were donating to political campaigns and/or political action committees supportive of particular campaigns or causes, when in truth and in fact the donated money was used to enrich DUPONT and to further the fraudulent fundraising scheme.

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

COUNT TWO  
(Aggravated Identity Theft)

2. From in or about 2015, up to and including in or about March 2019, in the Southern District of New York and elsewhere, JOHN PIERRE DUPONT, a/k/a "John Gary Rinaldo," a/k/a "John Gary," the defendant, knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, DUPONT used, transferred, and possessed the names of other individuals, including the names of certain candidates for elective political office, in connection with the offense charged in Count One of this Complaint.

(Title 18, United States Code, Sections 1028A(a)(1),  
1028A(b), and 2.)

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

3. I am a Special Agent with the United States Attorney's Office, Southern District of New York, and I have been personally involved in the investigation of this matter. I am familiar with the information contained in this affidavit based on my own personal participation in the investigation, my review of records, and conversations that I have had with other law enforcement officers and other individuals. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts I have learned during the course of my 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 Fraudulent Scheme**

4. As set forth below, since at least 2015, JOHN PIERRE DUPONT, a/k/a "John Gary Rinaldo," a/k/a "John Gary," the defendant, has defrauded thousands of donors who incorrectly believed they were donating to legitimate political action committees ("PACs"), to the campaigns of candidates in various federal and state elections, and to certain political causes. In truth and in fact, virtually all of the donations to the PACs, candidates or causes, totaling approximately more than \$250,000, were taken by DUPONT himself, or else used to perpetuate the fraud through additional fundraising expenditures. DUPONT never reported any of the donations he received in filings required by the Federal Election Commission ("FEC"), and the donations were

not directed to the campaigns or causes purportedly being supported by the PACs and related websites created by DUPONT.

5. JOHN PIERRE DUPONT, a/k/a "John Gary Rinaldo," a/k/a "John Gary," the defendant, used various means and methods to carry out the fraudulent scheme, including but not limited to the following:

a. DUPONT filed paperwork with the FEC to establish three PACs: Businessmen for a Businessman President PAC, Democrats for Congress PAC, and Foundation for Sanity in Politics PAC (collectively, the "Scam PACs").

b. The Scam PACs, along with related website and email solicitations purporting to be associated with or supportive of certain candidates and political causes, targeted victims across the country, including in the Southern District of New York. The Scam PACs and related websites raised funds on the basis of fraudulent representations that the donations would support political candidates, including candidates in certain races for president, the United States Senate, and state governorship. These representations were made, in part, on websites, through online advertisements, and in email communications. Certain of these representations were made using the identities of the relevant candidates.

c. In truth and in fact, the Scam PACs had no active operations, employees, or program activities. They failed to make required filings with the FEC to reflect donations received under their auspices, and they failed to direct any of the donations to or in support of the candidates or causes for which funds were purportedly being raised.

d. In perpetrating the scheme, DUPONT used both his real name and other variants of his name, including "John Gary Rinaldo," a name that he had previously legally used.<sup>1</sup>

#### **Background on PACs and Relevant Entities**

##### *Political Action Committees*

6. Based on my training and experience as a Special Agent, my participation in this investigation and my review of

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<sup>1</sup> Based on my review of records, I have learned that "John Gary Rinaldo" legally changed his name to "John Pierre Dupont" in or about 2012 in the State of California. As further described herein, variants of both of these names were used in connection with the fraudulent scheme.

records, including publicly-available information, I have learned the following:

a. A PAC is a type of political organization that can raise money to direct toward, for example and among other things, political parties, electoral campaigns, or issue-related expenditures. Under federal campaign finance laws and regulations, such committees must register with the FEC and periodically report their financial activities.

b. There are two types of PACs: (1) separate segregated funds, which generally are established by certain organizations and may solicit contributions only from individuals associated with those organizations, and (2) nonconnected PACs, which may solicit donations from the general public. Each of the Scam PACs was registered with the FEC as a nonconnected PAC.

c. Nonconnected PACs can be established by filing a form with the FEC that principally identifies the PAC's name, physical address, email address, internet website, and associated banking institution.

d. FEC rules require periodic public financial disclosures of the amounts of money received by PACs, including itemized disclosure for individuals who donate \$200 or more in a given year. FEC rules also require periodic public disclosures of PACs' expenditures, listed by amount and category of spending.

*Relevant Entities, Websites, and Email Accounts*

7. At least three individual PACs, the Scam PACs, have been associated with the fraudulent scheme, including the following:

a. Businessmen for a Businessman President PAC ("Businessman PAC"), established in September 2015 by JOHN PIERRE DUPONT, a/k/a "John Gary Rinaldo," a/k/a "John Gary," the defendant. In its public FEC filings, Businessman PAC listed "John Pierre duPont" as both its treasurer and its custodian of records.

b. Foundation for Sanity in Politics PAC ("Sanity in Politics PAC"), established by DUPONT in October 2018. In its public FEC filings, Sanity in Politics PAC listed "John duPont" as both its treasurer and its custodian of records.

c. Democrats for Congress PAC ("Democrats Congress PAC"), established by DUPONT in August 2018. In its public FEC filings, Democrats Congress PAC listed "John Pierre Dupont" as its treasurer and "John Gary Rinaldo" as its custodian of records.

8. At least approximately 15 individual websites (collectively, the "Websites") have been associated with the fraudulent scheme, including the following, each of which identified itself in website text as being associated with "Democrats For Congress" and/or the Democrats Congress PAC, unless otherwise specified:

a. DemocratsForCongress.com (the "Democrats Congress Website"), which purported to be raising money to support Democratic candidates for the United States House of Representatives;

b. DemocratsForSenate.org (the "Democrats Senate Website"), which purported to be raising money to support Democratic candidates for the United States Senate;

c. Beto4Senate.org (the "Beto Website"), BredesenForSenate.website, DonnellyForSenate.website, ManchinForSenate.website, McCaskillForSenate.website, HeitkampForSenate.website, StabenowForSenate.website, Nelson4Senate.org, RosenForSenate.website, and SinemaForSenate.website, each of which respectively purported to be raising money to support particular candidates for the United States Senate;

d. GillumForFloridaGovernor.org, which purported to be raising money to support a particular candidate for Governor of Florida (and together with the websites identified in subsection 8(c) above, collectively the "Candidate Websites");

e. Sanders2016Campaign.com (the "Sanders Website"), which was created in 2015 and identified itself as being associated with "The Sanders Organization," and which purported to be raising money to support the 2016 candidacy of Senator Bernie Sanders for president of the United States; and

f. ImmigrantChildrenReunited.org (the "Immigrant Children Website"), which identified itself as being associated with Sanity in Politics PAC, and which purported to be raising money "to unite immigrant families" and provide services in connection with certain United States immigration policies.



9. At least two email accounts have been used by JOHN PIERRE DUPONT, a/k/a "John Gary Rinaldo," a/k/a "John Gary," the defendant, in connection with the fraudulent scheme, including the following:

a. DUPONT has utilized an email account for which the username is JohnGary, the combined first and middle name of DUPONT's former name, John Gary Rinaldo (the "Rinaldo Email Account").

b. DUPONT has also utilized an email account for which the username is "DemocratsForCongress2018" and which is subscribed to in the name "John duPont" (the "Congress Email Account").

**False and Misleading Representations by the Scam PACs, Related Websites and Solicitations, and the Defendant**

10. Based on my participation in this investigation, and my review of records, including thousands of emails from several accounts used by JOHN PIERRE DUPONT, a/k/a "John Gary Rinaldo," a/k/a "John Gary," the defendant, or otherwise associated with the scheme as further described below, obtained pursuant to judicially-authorized search warrants on several email accounts (the "Email Search Warrant Returns"); financial, payment, and banking records; publicly-available information including FEC records; and interviews of individuals who donated to certain of the Scam PACs and through certain of the Websites conducted by myself and other law enforcement officers, I have learned the following:

*False and Misleading Representations in Websites*

a. As described above, numerous of the Websites purported to be associated with "Democrats For Congress" and/or the Democrats Congress PAC. The Immigrant Children Website purported to be associated with Sanity in Politics PAC.

b. Based on my review of records obtained from an online website hosting entity, I have learned that each of the Websites, except the Sanders Website, was registered under the same customer account (the "Hosting Account").<sup>2</sup> The Hosting

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<sup>2</sup> The Hosting Account has also registered the following websites, which do not yet appear to have received and processed donations: bidenforpresident.website; takebackthesenate.website; biden2020.website; joeformpresident.website; joebiden2020.website; gillibrandforpresident.website; and

Account customer information had the contact name "John DuPont/Rinaldo." Based on my review of records from a separate online website hosting entity, I have learned that payment records for registration of the Sanders Website listed "John duPont" in shipping and billing contact information.

c. The Democrats Congress Website claimed to raise money in support of certain federal congressional campaigns and contained a form in which individuals could, based on representations made on the Democrats Congress Website, supposedly donate money to, or in support of, certain congressional candidates. As further described below, those representations were false, and available bank and financial records do not reflect any of the donated money being provided to, or used to support, congressional candidates.

d. The Democrats Congress Website contained certain indicia indicating that the website is fraudulent; for example, a portion of the Democrats Congress Website contained purported copyright information that misspelled the word "democrat." Additionally, a section of the Democrats Congress Website touted that it represented a coalition of organizations, none of which appears to exist as described, based on my review of publicly-available information.

e. The Democrats Senate Website claimed to raise money for certain federal Senate campaigns and contained a form in which individuals could, based on representations made on the Democrats Senate Website, supposedly donate money to, or in support of, Democratic candidates for the U.S. Senate. As further described below, those representations were false, and available bank and financial records do not reflect any of the donated money being provided to, or used to support, Senate candidates. The Democrats Senate Website also contained links to various other of the Websites.

f. The Immigrant Children Website, which identified itself in website text as being associated with Sanity in Politics PAC, purported to be raising money in connection with certain United States immigration policies relating to the separation of undocumented immigrant family members in the course of immigration proceedings.

g. In particular, the Immigrant Children Website claimed that: "Our volunteer attorneys, doctors, nurses

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bredesenforpresident.com. Additionally, several of the Websites described herein remain actively soliciting donations as of in or about March 2019.



and social workers are working day and night to liberate these children." It further claimed that: "Donations will go to help pay our volunteer attorneys', doctors', nurses' and social workers' costs and pay for transportation to unite immigrant families." In truth and in fact, and as further described below, Sanity in Politics PAC has no such volunteers, or any other employees or operations, and neither Sanity in Politics PAC nor DUPONT made any expenditures toward any such volunteer, transportation, or other related efforts.

h. Each of the Candidate Websites purported to support its respective candidate for office by, among other things, including the text "Support [Candidate] TODAY" above a link with the text "DONATE" that led to an online donation page. Each of the Candidate Websites stated that it was paid for by the Democrats Congress PAC, and each stated that: "Your donations are collected by DFC [Democrats for Congress PAC] and combined with other donations and allocated by DFC to support [candidate's] campaign within 72 hours." In truth and in fact, and as further described below, the donations made through the Candidate Websites were not transferred to campaigns or used to support candidates or their campaigns apart from being used to create further fraudulent solicitations.

i. Approximately six of the Candidate Websites ascribed part or all of the same lengthy quote to the relevant respective candidates. Based on a review of publicly-available information, I do not believe that any of the relevant candidates have been associated with the portions of the quote attributed to them on the Candidate Websites.

j. DUPONT registered the Sanders Website in or about October 2015. The Sanders Website stated, among other things, that: "We are a non profit corporation (The Sanders Organization)" that was "organized to support the candidacy of Bernie Sanders for President" and that "[y]our money will support Progressive Democrat Presidential Candidate Bernie Sanders." In truth and in fact, as further described below, none of the money sent to DUPONT through The Sanders Organization went to support the candidacy of Senator Bernie Sanders.

k. Each of the candidates for whom one of the Candidate Websites was created was a candidate for office as claimed in the Candidate Websites. The true names of the relevant candidates were used in solicitation materials, including but not limited to the Candidate Websites, in relation to and in furtherance of the scheme described herein.

*Victim Donations and Communications with DUPONT by Email*

11. I have identified approximately more than 1,000 donations to the Scam PACs and campaigns, including through the Websites discussed herein, and including from donors in the Southern District of New York. In addition, as detailed below, I have learned that JOHN PIERRE DUPONT, a/k/a "John Gary Rinaldo," a/k/a "John Gary," the defendant, falsely represented himself in emails to donors and prospective donors as being associated with the campaigns of certain of the electoral candidates in whose names he established the false and fraudulent Candidate Websites.

12. For example, based on my review of financial records, payment processing records, records of donation and donation confirmation materials, and my interviews of two individuals who donated through certain of the Websites ("Victim-1" and "Victim-2"), I have learned the following:

a. Records obtained in connection with a certain payment processing account associated with JOHN PIERRE DUPONT, a/k/a "John Gary Rinaldo," a/k/a "John Gary," show that Victim-1 contributed \$100 through the Beto Website in or about October 2018.

b. In or about December 2018, I interviewed Victim-1, who stated, in substance and in part, that Victim-1 intended to donate \$100 to the Senate campaign of Beto O'Rourke through the Beto Website. Victim-1 paid the \$100 with a credit card. Victim-1 resides in the Southern District of New York.

c. Victim-1 provided law enforcement officers a copy of a receipt ("Receipt-1") that Victim-1 received via email in or about October 2018 after making the \$100 donation. Receipt-1 stated, in substance and in part, "[t]hank you for your donation" and was signed, "Sincerely, Robert Francis 'Beto' O'Rourke (D) U.S. Senator For Texas." Receipt-1 was emailed to Victim-1 from the Rinaldo Email Account.

d. Records obtained in connection with a certain payment processing account associated with DUPONT show that Victim-2 contributed \$200 through the Beto Website in or about October 2018.

e. In or about December 2018, I interviewed Victim-2.<sup>3</sup> After reviewing personal records, Victim-2 stated that Victim-2 donated \$200 to what Victim-2 believed to be the Senate campaign of Beto O'Rourke through the Beto Website. Victim-2 paid the \$200 with a credit card. Victim-2 resides in the Southern District of New York.

f. Victim-2 provided law enforcement officers a copy of a receipt ("Receipt-2") that Victim-2 received via email in or about October 2018 after making the \$200 donation. Receipt-2 stated, in substance and in part, "[t]hank you for your donation" and was signed, "Sincerely, Robert Francis 'Beto' O'Rourke (D) U.S. Senator For Texas." Receipt-2 was emailed to Victim-2 from the Rinaldo Email Account.

13. Based on my review of the Email Search Warrant Returns and certain financial and website registration records, I have learned the following:

a. On or about August 16, 2018, the Rinaldo Email Account received an email from the Congress Email Account"). The subject of the email was "test." The content of the August 16, 2018 email referred to certain electoral candidates and districts, and included a link to the Democrats Congress Website.

b. That same day, after the "test" email, the Congress Email Account sent approximately 20 emails to approximately more than 180 total email addresses (collectively, the "August 16 Emails"). The August 16 Emails described certain congressional races and directed recipients of the email to the Democrats Congress Website, which contained further solicitation materials.

c. In addition to solicitation emails, the Congress Email Account, like the Rinaldo Email Account, was used to communicate directly with donors. For example:

i. One email to a donor, signed by "John Dupont, Director" falsely claimed that a donation "went directly to the Heirkamp [sic] campaign," which, based on my participation in this investigation and my review of publicly-available information, I believe refers to the 2018 U.S. Senate campaign of Heidi Heitkamp. That email also falsely claimed that "we have utilized the donations to support our ground

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<sup>3</sup> Victim-2 did not immediately recall making a donation to Beto O'Rourke during my initial interview, but recalled the donation after reviewing records.

activities" and that "[w]e have deployed an attorney and three volunteers" in connection with the campaign. In fact, DUPONT disbursed no funds to the Heitkamp campaign, and there were no such ground activities, attorneys, or volunteers being paid for by the Democrats Congress PAC, by DUPONT himself, or by any other organization associated with, or receiving funds from, DUPONT.

ii. Another email to a donor, signed by "John Dupont," falsely claimed that a particular donation had gone to the "Beto Campaign," which, based on my participation in this investigation and my review of publicly-available information, I believe refers to the 2018 U.S. Senate campaign of Beto O'Rourke. The email stated that Democrats for Congress "is bundling your donation and within 72 hours allocates the funds donated to the Beto O'Rourke campaign" and that "we have disbursed your funds to the Beto advertising campaign." In fact, DUPONT disbursed no funds to the O'Rourke Campaign, or to any advertisements other than solicitations utilized to further perpetuate the fraud.

d. On or about October 25, 2018, the Rinaldo Email Account sent an email to an individual who self-identified as an "online marketing consultant" with the subject "Re: 1st Page of GOOGLE." The email stated: "Is there a way to get me to the top of the search right now? I don't care if google or microsoft BING bars me. We are running a political campaign which will be over in 12 days. So I only need to be there for 7 days. We will pay very, very well!"

**The Scam PACs Used Donations Exclusively to Enrich the Defendant and to Continue the Fraudulent Scheme**

14. Based on my review of records, including the Email Search Warrant Returns, FEC records, bank account data for several accounts affiliated with the Scam PACs and JOHN PIERRE DUPONT, a/k/a "John Gary Rinaldo," a/k/a "John Gary," the defendant, and other records described below, I have learned the following:

a. The Scam PACs appear to have little or no operations whatsoever beyond their associated websites, online and email solicitations, and donation processing. Other law enforcement officers and I have reviewed thousands of emails contained in the Email Search Warrant Returns; bank account data for several accounts affiliated with the Scam PACs and the defendant; and a variety of other records pertinent to the Scam PACs. Those materials revealed no advocacy campaigns; no political operations; no employees of the Scam PACs; no

volunteers associated with the Scam PACs or the causes espoused in the Websites; no outreach to political organizations, media, or other advocacy organizations; and no political contributions made to candidates or issue-based organizations.

b. The Scam PACs and their associated Websites received donations via credit card payments processed through multiple payment-processing entities.

c. In particular, one payment processing entity ("Processor-1") processed donations made through certain of the Websites.

i. In email communications with Processor-1, using the Congress Email Account, an individual purporting to be "John Dupont, Custodian of Records and Treasurer" falsely represented to Processor-1 that Democrats Congress PAC was raising money to, among other things, "put volunteers [. . .] in registering Democrats in [certain] districts and provide advertising such as bill boards, yard signs and bumper stickers. . . . We are knocking on doors and registering thousands of Hispanic voters." As described above, Democrats Congress PAC had no such operations.

ii. Processor-1 processed approximately more than \$3,000 of donations intended for Democrats Congress PAC, through various of the Websites, from approximately more than 30 donors in or about September 2018.

iii. In or about September 2018, Processor-1 issued two checks payable to "Democrats for Congress," both of which were endorsed by "John Rinaldo" and deposited into a checking account held in the name of John Gary Rinaldo (the "Rinaldo Bank Account").

iv. In or about September 2018, Processor-1 closed the payment account associated with DUPONT due to what Processor-1 believed was misleading content in certain of the Websites.

d. Another payment processing entity ("Processor-2") processed donations made through certain of the Websites.

i. Democrats Congress Website's account with Processor-2 was registered with the business name of Sanity in Politics PAC, and was described as being to "[p]romote various political and social campaigns" and to "[p]rovide



volunteer and other opportunities and requests for help and donations from registered Democrats."

ii. DUPONT communicated via email with Processor-2 regarding payment processing matters. Among other things, DUPONT stated to Processor-2, in connection with issues regarding the payment processing, that "[m]y donors are complaining that there [sic] donations are not going through."

iii. In or about 2018, Processor-2 processed approximately more than \$100,000 from approximately more than 1,000 individual donations made through various of the Websites. The donations generally were small-dollar donations of \$100 or less.

iv. In or about 2018, Processor-2 transferred approximately more than \$95,000 to the Rinaldo Bank Account.

e. As described above, one of the fraudulent Websites was the Sanders Website, which identified itself as being associated with "The Sanders Organization," and which purported to be raising money to support Bernie Sanders' 2016 candidacy for president. Based on my review of records, including the Email Search Warrant Returns and certain bank records, I have learned the following:

i. In or about January 2016, DUPONT established an email account with the username "TheSandersOrganization" and also established a bank account with the title "The Sanders Organization" (the "Sanders Organization Bank Account") listing "John Gary Rinaldo" as "President/Secretary."

ii. The Sanders Website stated that: "EVERY TIME WE PROCESS YOUR CREDIT CARD DONATION, THE BIG BANKS TAKE UP TO 40% OF THE DONATIONS JUST FOR PROCESSING YOUR CREDIT CARD DONATION. . . . THAT IS WHY WE ARE GIVING YOU THE OPTION . . . TO MAKE YOUR DONATIONS IN CASH OR CHECK BY SENDING YOUR DONATION" to a particular address. The Sanders Website also received donations made online, via credit card.

iii. In or about 2015 and 2016, DUPONT received donations totaling more than \$140,000 from donations to the Sanders Organization, including donations made electronically and via check. DUPONT deposited approximately more than 800 checks into the Sanders Organization Bank Account. Certain of the checks deposited were made payable to, among



other payees, "The Sanders Campaign," "Bernie Sanders Pres. Campaign," and "Bernie Sanders for President."

15. Based on my review of account statements and my training and experience, the Rinaldo Bank Account and the Sanders Organization Bank Account appear to be utilized as personal banking accounts, *i.e.*, not accounts associated with any political candidate or political committee. In particular:

a. Expenditures from the Sanders Organization Bank Account appear to be primarily for personal purchases or for expenditures in connection with facilitating the fraud. For example, in February 2016, JOHN PIERRE DUPONT, a/k/a "John Gary Rinaldo," a/k/a "John Gary," the defendant, using the name John Rinaldo, wrote two checks from the Sanders Organization Bank Account totaling approximately \$25,300 to an auto dealership for a Mercedes-Benz sedan. Several checks written from the Sanders Organization Bank Account have memo lines that include the word "Rent," and other memo entries include "IT" or "website." DUPONT also used the Sanders Organization Bank Account to purchase internet advertisements, and made significant cash withdrawals.

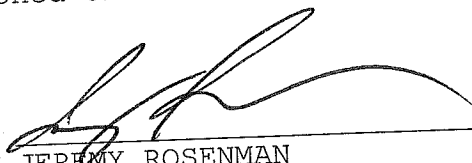
b. Expenditures from the Rinaldo Bank Account appear to be primarily for personal purchases or for expenditures in connection with facilitating the fraud. For example, approximately more than 30 checks written from the Rinaldo Bank Account include the word "Rent" in the memo entry, and other checks are written in connection with, for example, a Mercedes-Benz dealership, the payment of traffic and parking tickets, and car insurance payments. DUPONT also used the Rinaldo Bank Account to purchase internet advertisements and to make credit card payments, and made significant cash withdrawals.

c. Bank account and payment processor account records for the Scam PACs and other related entities, including for the Rinaldo Bank Account and the Sanders Organization Bank Account, reveal no payments to campaigns or to organizations for political, marketing, or other purposes that would traditionally be associated with PACs or political causes or efforts.

16. Based on my review of financial records associated with JOHN PIERRE DUPONT, a/k/a "John Gary Rinaldo," a/k/a "John Gary," the defendant, I have learned that DUPONT received approximately more than \$250,000 of funds donated to the various candidates and causes purportedly supported by the Scam PACs and the Websites.


17. Based on my review of publicly-available FEC records, I have learned that none of the Scam PACs filed public FEC reports reflecting donations received through the Websites associated with the Scam PACs, as required under relevant election and campaign laws and regulations.

WHEREFORE, the deponent respectfully requests that a warrant be issued for the arrest of JOHN PIERRE DUPONT, a/k/a "John Gary Rinaldo," a/k/a "John Gary," the defendant, and that he may be arrested and imprisoned or bailed, as the case may be.

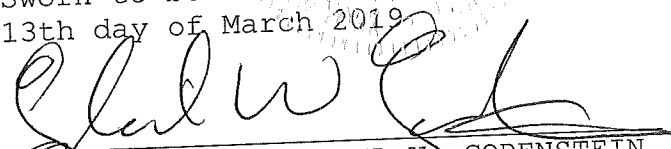


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JEREMY ROSENMAN  
Special Agent  
United States Attorney's Office  
Southern District of New York



Sworn to before me this  
13th day of March 2019



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THE HONORABLE GABRIEL W. GORENSTEIN  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK