

AO 91 (Rev. 11/11) Criminal Complaint

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**UNITED STATES DISTRICT COURT**  
for the  
Eastern District of Michigan

United States of America  
v.  
Joseph Strange

Case No . 25-30160

**CRIMINAL COMPLAINT**

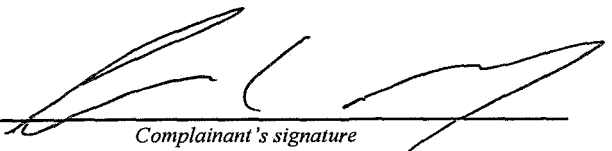
I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 16, 2025 in the county of Oakland in the  
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 2319	Criminal Infringement of a Copyright
17 U.S.C. § 506	Criminal Infringement of a Copyright
18 U.S.C. § 2314	Interstate Transportation of Stolen Goods

This criminal complaint is based on these facts:

Continued on the attached sheet.

  
\_\_\_\_\_  
*Complainant's signature*

Brian Max, Special Agent  
\_\_\_\_\_  
*Printed name and title*

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: March 19, 2025

  
\_\_\_\_\_  
*Judge's signature*

City and state: Detroit, MI

Hon. Anthony P. Patti  
\_\_\_\_\_  
*Printed name and title*

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN

JOSEPH STRANGE, Defendant.

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed since May 2002. I am currently assigned to the Detroit Field Office of the FBI, at the Oakland County Resident Agency. Since becoming a Special Agent with the FBI, I have investigated crimes involving corruption by state and local officials, violent crimes, firearms offenses, bank robberies, drug offenses and money laundering, as well as mail and wire fraud.

**EXECUTIVE SUMMARY**

2. Joseph Strange (DOB 04/29/1978) violated criminal copyright laws through the sale of unreleased music created by the artist Marshall Mathers (AKA Eminem). On or about January 16, 2025, the FBI was contacted by employees of Mathers's music studio in Ferndale, Michigan. The employees recently discovered unreleased music created by Mathers that was available on the internet. This music was still in the process of being developed by Mathers. The employees also obtained an image of a list of the music that Mathers had created, but not released, and was for sale through various internet sites. The employees recognized this as an image taken

directly from a hard drive in the Ferndale studio. The music in question could only have been taken by someone with direct physical access to a secure location in the studio.

3. The FBI was able to identify and locate multiple individuals that purchased the unreleased music. These individuals identified Joseph Strange as the person who was selling the music.

4. Joseph Strange is a 46-year-old male who lives in Holly, Michigan. Joseph Strange was an employee of Marshall Mathers from approximately 2007 until 2021, when he was let go. Joseph Strange worked at the studio in Ferndale and had access to the music that was leaked.

5. The FBI searched the residence of Joseph Strange in Holly, Michigan, pursuant to a warrant, on January 28, 2025 and seized evidence including hard drives containing copies of the unreleased music that was made available on the internet and hand-written notes/lyric sheets created by Mathers.

6. Financial records obtained by the FBI document payment to Joseph Strange for the music that he sold.

7. Affiant believes that evidence exists to support probable cause for the following violations: 18 U.S.C. § 2319 and 17 U.S.C. § 506 (Criminal Infringement of a Copyright), and 18 U.S.C. § 2314 (Interstate Transportation of Stolen Goods), hereinafter Subject Offenses.

### **PURPOSE OF AFFIDAVIT**

8. This affidavit sets forth probable cause in support of a Criminal Complaint for Joseph Strange of Holly, Michigan, for the Subject Offenses. I have not included every fact known to investigators regarding this investigation but only those necessary to establish the probable cause needed to prove the Subject Offenses.

### **PROBABLE CAUSE**

#### **Marshall Mathers**

9. Marshall Mathers is a music artist who goes by the name “Eminem.” Mathers is from Michigan and owns a studio in Ferndale, Michigan, that he uses to create and develop music for future sale and distribution. The studio is not open to the public and is not rented out for profit. Only employees and invited guests are allowed in the studio. The music that Mathers creates is legally owned by Interscope Capital Labels Group via a contractual agreement.

#### **Unauthorized Release of Music**

10. Employees of Mathers were alerted that music created by Mathers was being played on various Internet sites including reddit, YouTube and leaked.cx. Employees of Mathers conveyed to the FBI that (1) they listened to these songs and immediately recognized them as music that was not yet released and (2) that they were able to identify the music as having been stored on hard drives in the studio in Ferndale. These hard drives are not connected to the internet for security reasons.

11. To date, over 25 songs have been played/distributed on the internet without the consent of Mathers and/or Interscope Capital Labels Group. These songs were originally created by Mathers between 1999 and 2018 and were in various stages of development.

**Access to music on hard drives**

12. On January 16, 2025, affiant and other FBI agents went to the Ferndale studio and interviewed multiple employees. The following information was obtained through the employee interviews. The studio where the music is kept is the personal studio of Mathers. The public is not allowed in the studio and only employees and invited guests are admitted. Mathers uses the studio to create the music that is ultimately sold and distributed to the public. For security reasons, the music Mathers creates is stored on hard drives that are not accessible to the internet. These hard drives are password protected but the employees that have access to the drives use the same password. These hard drives, when not in use, are also stored in a safe.

13. From 2007 through 2021 only four employees had access to the hard drives in question: sound engineers Anthony (Tony) Campana, Mike Strange, and Joseph (Joseph) Strange, and manager John Fisher. Fisher, Campana and Mike Strange are all current employees at the studio and have all been interviewed by the FBI.

14. Mike Strange is currently employed at the studio as a sound engineer. Mike Strange provided the following information:

- Mike Strange is the uncle of Joseph Strange but the two were raised together and consider themselves brothers.
- Joseph Strange lives in Holly, Michigan.
- Joseph Strange worked at the studio in Ferndale until he was let go in 2021.
- Joseph Strange helped set up and operate the computer/hard drive system that contains the music created by Mathers. This system is not connected to the internet and only a few people have access to the system. Joseph Strange had access to the drives while he was employed at the studio.
- Joseph Strange recently had surgery.
- Joseph Strange is heavily involved in Bitcoin.
- Joseph Strange was working as a delivery driver for a marijuana dispensary after he stopped working at the studio.
- Mike Strange is familiar with the music that was leaked on the internet. This music could have only come from someone who has direct physical access to the hard drives that contain the music.

15. Tony Campana is currently employed as a sound engineer at the studio.

Campana provided the following information:

- Campana is one of a few employees that has access to the hard drives where music created by Mathers is kept. These hard drives are not hooked up to the Internet and are password protected.

- Former employee Joseph Strange also had access to the hard drives during his employment with Mathers.
- Joseph Strange was involved in Bitcoin mining while he worked at the studio.
- Campana is familiar with the music created by Mathers that was leaked on the Internet. Campana has also observed the image of the music listed as it would appear on a hard drive. Campana believes that this music and image could have only come from direct physical access to the hard drives in the studio.

#### **Internet tip from the United Kingdom**

16. Upon realizing that someone was publishing the music without authority, Mathers contacted his business associate Fred Nasser for assistance. Nasser sent out a social media post warning fans of Mathers not to participate in distributing the leaked music. In response to his post, Nasser was contacted by a fan, hereinafter the tipster fan. The tipster fan communicated extensively with Nasser over the next few days via Instagram and electronic messages, these messages were provided to the FBI. The tipster fan also provided Nasser his telephone number in the UK. The tipster fan is a resident of the United Kingdom and has been interviewed by the FBI.

17. The messages provided by the tipster fan were reviewed by the FBI. The messages show chats between the tipster fan and a person using the screen name

Doja Rat. Doja Rat claimed that he (Doja Rat) purchased the songs from a man named Joseph Strange, who used to be an employee of Mathers. Doja Rat claimed to have paid Joseph Strange approximately \$50,000 for the music. Doja Rat stated that Joseph Strange needed the money to fund a surgery that Joseph Strange recently had. Doja Rat also said Joseph Strange is heavily involved in Bitcoin. According to Doja Rat, Joseph Strange claimed to have over 300 songs and hand-written lyric sheets that were created by Mathers. According to Doja Rat, Joseph Strange used the screen name “Dope Edit” when discussing the stolen music on the Internet.

18. Doja Rat provided an image of a list of songs that Joseph Strange said he has access to. This image looks like an older model computer file structure with approximately 50 sub files that are listed with the title of the song in alphabetical order. Employees of Mathers recognized this as the file structure from the hard drives that are kept in the studio where the unreleased music was stored.

19. Employees of the studio conducted a review of the hard drives at the studio after they were made aware of the leak. On a hard drive entitled “RAID 1” they found the exact listing of songs that were posted on the Internet and provided to the FBI. This hard drive was in a safe and had not been accessed in several years. A review of the log on this hard drive shows files being removed after the attachment of an external drive on October 16, 2019, and on January 16, 2020, during the time that Joseph Strange was employed at the studio. Employee John Fisher provided



affiant with the access log and images in question. Fisher believes the removal of these files was not in the normal course of business and that these files contained unpublished music created by Mathers. Fisher also provided the FBI images of a list of songs taken directly from the “Raid 1” hard drive. These images were reviewed, and they appear to be identical to the list of songs that were offered for sale to Doja Rat.

**Information provided by music buyers**

20. “Doja Rat” was ultimately identified as a 31-year-old male who is a resident of Ontario, Canada. Doja Rat’s identity was confirmed by, and he was interviewed by, the FBI. He admitted to being the person using the name Doja Rat that was involved in buying leaked songs from Joseph Strange and involved in the chats provided by the tipster fan. Doja Rat said he first met Joseph Strange when Strange was running a YouTube site under the name Dope Edit.

21. Doja Rat is a fan of Mathers’s music. The YouTube site Dope Edit would play unique versions of Mathers’s songs. Doja Rat started his contacts with Joseph Strange through the Dope Edit site. Doja Rat did not initially know the identity of Joseph Strange. Doja Rat and Joseph Strange started to have private chats on the platform Discord and then moved to the platform Signal. Joseph Strange then indicated to Doja Rat that he (Strange) had unpublished music created by Mathers for sale.

22. Over the course of a series of chats on Signal, Joseph Strange told Doja Rat that he was a former employee of Marshall Mathers. Doja Rat confronted Joseph Strange with information sourced from the internet that pointed to his true identity. Joseph Strange then acknowledged his true identity and that he used to work as a sound engineer for Mathers. Joseph Strange and Doja Rat then began to negotiate for the sale of unreleased music.

23. The first purchase of music from Joseph Strange took place in August of 2024. Doja Rat agreed to buy approximately four songs for \$8500. Joseph Strange would only accept Bitcoin as payment. Doja Rat, with the help of a group of Mathers's fans online, raised the money and sent the payment in Bitcoin as requested. Doja Rat works at a bank and would take lines of credit to purchase the Bitcoin. Doja Rat would then be repaid by the aforementioned group of fans through PayPal.

24. Over the next few months Doja Rat and his group purchased more songs from Joseph Strange. Each time the songs were purchased Doja Rat would send the payment to Joseph Strange via Bitcoin. Doja Rat believes he sent approximately \$50,000 worth of Bitcoin payments to Joseph Strange over a six-month period. Doja Rat purchased approximately 25 songs from Joseph Strange. Doja Rat believes that these songs were made public on the internet by a member of the group of fans who were helping to pay for the music.

25. Joseph Strange also had lyric sheets hand-written by Mathers for sale. Joseph Strange asked Doja Rat to help sell these items. Joseph Strange sent images of these hand-written sheets to show they were authentic. Joseph Strange told Doja Rat that he obtained these sheets during a flood at the studio where he worked for Mathers. During the flood and cleanup, Joseph Strange was able to take these items. Joseph Strange also provided Doja Rat an image of a list of songs to which he had access.

26. Joseph Strange told Doja Rat he needed the money from the sale of the music for expenses related to a surgery he was planning. During their communications about the sale of the music Joseph Strange used several different screen names and email address to obscure his identity. Joseph Strange used one of the email addresses (email address 1) to send links to Doja Rat so Doja Rat could download the unreleased music that was purchased from Joseph Strange.

27. Doja Rat was assisted with the purchase of the music from Joseph Strange by a man using the screen name "Kali Kush." Doja Rat used this individual to help organize the group of fans to purchase the music. Kali Kush also has records of much of the interaction that the group had with Joseph Strange. The identity of Kali Kush has been confirmed by, and he has been interviewed by, the FBI. Kali Kush is a resident of the State of Massachusetts. Kali Kush provided a statement that is consistent with the information provided by Doja Rat. Kali Kush also provided the FBI images of online chats/conversations with Doja Rat and Joseph Strange. These

records were reviewed by the FBI and corroborate the information provided in the interviews of Doja Rat. This individual also provided the FBI with images of the hand-written lyric sheets and song files that Joseph Strange was trying to sell.

28. Kali Kush also provided the following information:

- Kali Kush was also involved with another group of music purchasers that purchased music from Joseph Strange. This group purchased a small amount of unreleased music from Joseph Strange prior to the purchase involving Doja Rat. Kali Kush stated that this first group was organized by an individual using the screen name “ATL,” ATL and Kali Kush arranged for the purchase of a couple unreleased songs from Joseph Strange. The purchased price for these songs was approximately \$1000.
- Joseph Strange requested payment for the music via Venmo. To further this payment, Strange sent his Venmo account information to ATL who, in turn, gave the information to Kali Kush (ATL did not have access to Venmo at the time). The Venmo account used by Strange was in the name “Hal Finney.” To make sure the Venmo transaction would go through the parties agreed to do a \$1.00 test payment. Kali Kush sent the \$1.00 test payment to Strange at approximately 11:00pm on August 3, 2024. Kali Kush provided the FBI the information related to the Venmo transaction.

29. Affiant has reviewed records provided by Venmo related to the above-described test payment. The records confirm the payment went to an account used by Joseph Strange. The account has a false name associated with it, but the subscriber information contains the known residence for Strange, as well as his real social security number. Furthermore, the email address linked to the Venmo account is the email 1.

30. The FBI was able to identify, and interview, the individual using the screen name ATL. ATL is a resident of the State of Connecticut. ATL was the individual who organized the first group of Mathers's fans that purchased a few songs from Strange.

31. ATL Provided the following information:

- ATL said he first met Joseph Strange through a YouTube site called "Dope Edit." ATL is a fan of Mathers's music and the Dope Edit site had information about Mathers. ATL started messaging Strange through the Dope Edit YouTube site. Initially, ATL did not know the true identity of Joseph Strange. After numerous contacts ATL was able to determine Dope Edit was Joseph Strange.
- ATL and Joseph Strange began emailing each other directly, Joseph Strange using email address 2. Joseph Strange indicated that he had unreleased Mathers music to sell as well as some original hand-written items from

Mathers. Joseph Strange sent images of the hand-written items, and a list of music, to ATL via email. ATL provided these images to the FBI.

- In July of 2024, ATL negotiated the purchase of three Mathers songs, and a portion of a fourth song, from Joseph Strange. This was Mathers music that had not been released. The price for the unreleased music was \$1000. Joseph Strange wanted the money sent via Venmo to an account in the name “Hal Finney.” ATL did not have a Venmo account, so he asked another member of the Mathers fan group, Kali Kush, to arrange the test payment via Venmo described above. Joseph Strange, however, ultimately decided he wanted the payment for the music via Bitcoin.

32. To facilitate the Bitcoin payment, Joseph Strange emailed ATL with the wallet address that Joseph Strange wanted the Bitcoin sent to. ATL provided the FBI with this email and wallet address. This email, and other emails from Joseph Strange came from email address 2. The FBI obtained financial records for this transaction.

33. An FBI agent trained and experienced in cryptocurrency transactions obtained and reviewed the records for the Bitcoin transaction between ATL and Joseph Strange. The review confirms that in July of 2024, Bitcoin in the amount of approximately \$1000, was sent to the wallet as instructed by Joseph Strange. In January of 2025, this Bitcoin wallet transferred the funds to a Coinbase account. Records obtained by the FBI from Coinbase confirm the Coinbase account/address

the Bitcoin in question was sent to, is held by Joseph Strange with the address listed as Joseph Strange's known residence. The account information also includes the true social security number for Joseph Strange.

34. John Fisher, manager for Mathers, was shown several images of screen grabs of music files that Joseph Strange was offering to sell to ATL, Dope Edit, and Kali Kush. These files contain the titles to over 100 songs created by Mathers. Fisher was able to identify these as images that were taken directly off the hard drive in the studio labeled "Raid 1." Fisher confirms that Joseph Strange did not have permission to possess/sell these items. Fisher was also played one of the audio recordings sold to ATL. Fisher confirmed the music contained a version of a Mathers song. The version Strange sold to ATL had not been released to the public.

#### **Search of Joseph Strange's Residence**

35. On January 28, 2025, the FBI searched, pursuant to a warrant, the residence of Joseph Strange. Joseph Strange was present at the time the warrant was executed.

36. During the search, FBI agents located numerous original hand-written lyric sheets and notes that were made by Marshall Mathers in a safe in the home. These hand-written items contained the original documents that were imaged and offered for sale to individuals buying music from Joseph Strange.

37. Agents also located a VHS tape that contained an unreleased music video made by Mathers. An image of this tape was also sent to Doja Rat and ATL.

38. The above items were shown to John Fisher, a manager for Mathers who works at the studio in Ferndale. Fisher confirmed that these items are property of Mathers that were stored in a safe at the studio in Ferndale and that Joseph Strange did not have permission to be in possession of these items.

39. Also located during the search of Joseph Strange's known residence were numerous hard drives that contain thousands of audio files. An initial review of one of the hard drives that was seized from Strange identified approximately 12,000 audio files. Some of these files contain music created by Mathers, and by other artists working with Mathers.

40. These files contain audio of Mathers music in various stages of development including "stem sessions." Stem sessions are audio files that contain portions of songs that are ultimately mixed together to create a song that is releasable to the public. Mathers manager John Fisher confirms that Joseph Strange did not have authority to possess these audio files.

#### **Non-Disclosure/Severance Agreement**

41. Prior to terminating his employment with Mathers, Joseph Strange signed a non-disclosure agreement (NDA) as part of a severance package. A copy of the agreement was provided to the FBI. The NDA was signed by Joseph Strange on January 12, 2021. The agreement restricts Joseph Strange from disclosing any information related to Mathers and other artists working with Mathers. Specifically,

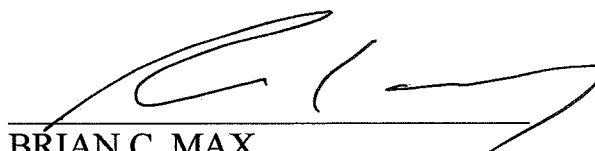


the agreement reads that Strange shall not “post, transmit, or otherwise circulate via any electronic means . . . any photos, videos or audio, of or concerning Company, Artist, and/or Artist Associate or any other confidential Information or information concerning Company, Artist, and/or an Artist Associate . . .”

42. The agreement further reads “you are hereby expressly acknowledge [sic] that you understand the importance of protecting Company’s, Artist’s and any Artist Associates’ intellectual property (including any masters embodying Artist’s performances and any photographs and/or videos embodying Artist’s likeness, activities and/or performances . . .) and you hereby agree to take all necessary and appropriate security measures towards that end”.

### CONCLUSION

43. Based on the above affiant believes that probable cause exists that Joseph Strange has committed the following offenses: 18 U.S.C. § 2319 and 17 U.S.C. § 506 (Criminal Infringement of a Copyright), and 18 U.S.C. § 2314 (Interstate Transportation of Stolen Goods)

  
BRIAN C. MAX  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to before me and signed  
in my presence and/or by reliable electronic means



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HON. ANTHONY P. PATTI  
UNITED STATES MAGISTRATE JUDGE  
Detroit, Michigan

March 19, 2025