

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

Richmond Division

UNITED STATES OF AMERICA,	)	Criminal No. 3:21-cr-017-HEH
	)	
	)	18 U.S.C. § 2251(a)
	)	Production of Child Pornography
v.	)	(Counts 1 & 3)
	)	
	)	18 U.S.C. § 2252A(a)(2)(A)
JOSHUA CLAYTON BRADY,	)	Receipt of Child Pornography
a.k.a. "Joshua Weston" and	)	(Counts 2, 4 & 5)
"Theo Schwarzman,"	)	
	)	18 U.S.C. § 1341
Defendant.	)	Mail Fraud
	)	(Count 6)
	)	
	)	18 U.S.C. § 1343
	)	Wire Fraud
	)	(Counts 7-10)
	)	
	)	18 U.S.C. § 1344
	)	Bank Fraud
	)	(Counts 11-18)
	)	
	)	18 U.S.C. § 1028A(a)(1)
	)	Aggravated Identity Theft
	)	(Counts 19-21)
	)	
	)	Forfeiture Notice

**SUPERSEDING INDICTMENT**

June 2021 Term — At Richmond, Virginia.

THE GRAND JURY CHARGES THAT:

**Introductory Allegations**

1. Beginning prior to December 2015 and continuing through January 2020, defendant JOSHUA CLAYTON BRADY, also known as "Joshua Weston" and "Theo

Schwarzman,” sought out minor and adult females over the Internet, sometimes using [www.seeking.com](http://www.seeking.com) or [www.SeekingArrangement.com](http://www.SeekingArrangement.com), two Universal Resource Locators (URLs) used to access a website more commonly known as “Seeking Arrangement.” “Seeking Arrangement” is a dating website that generally matches older and wealthier men and women with young men and women.

2. BRADY sometimes assumed false identities in his interactions with the minor and adult females he met. Among the identities he used were “Joshua Weston,” purportedly a member of a wealthy family in the United Kingdom, and “Theo Schwarzman,” who was purportedly the son of Person A (the Chief Executive Officer of Investment Company A, a private equity firm based in New York) and the brother of Person B (Person A’s son and an officer in a film production company).

3. BRADY engaged in on-line sexual activity with some of the minor and adult females he met. The on-line sexual activity was occasionally recorded. On occasion, BRADY induced their participation in these activities by false representations about career opportunities or financial support he could offer them, or by threats and intimidation, including the threat of exposing the females’ participation in the sexual activity or their use of the dating websites.

4. JP Morgan Chase Bank, Discover Bank, and American Express were financial institutions with their deposits insured by the Federal Deposit Insurance Corporation (FDIC).

#### **The Scheme and Artifice to Defraud**

5. Beginning prior to March 2016, and continuing through on or about January 2020, the exact dates being unknown to the Grand Jury, in the Eastern District of Virginia and within the jurisdiction of this Court, as well as elsewhere, BRADY executed and attempt to execute a scheme and artifice to defraud and to obtain property by means of materially false and fraudulent

pretenses and promises from various female victims and from JP Morgan Chase Bank, Discover Bank, and American Express.

**Purpose of the Scheme and Artifice to Defraud**

6. The purpose of the scheme and artifice to defraud was for BRADY to obtain property, money, and services to which he was not entitled from the females mentioned above and from federally insured financial institutions.

**Ways, Manner, and Means of the Scheme and Artifice to Defraud**

7. BRADY induced the minor and adult females to participate in the fraud scheme by the same false representations, threats, and intimidation described above. BRADY, posing as “Theo Schwarzman,” told the minor and adult females that he had a friend named “Joshua Brady” and the false persona introduced the minor and adult females to BRADY. Thereafter, acting at the direction of one of the false personas, the minor and adult females sent funds directly to BRADY, added BRADY as an authorized user of their credit or debit cards, and purchased items for BRADY using those cards. At times, the minor and adult females, acting at BRADY’s direction, opened new credit accounts for use in the scheme, providing false information about their employment and income during the application process.

8. Acting at BRADY’s direction, the minor and adult females often falsely claimed to the financial institutions that issued the credit and debit cards that the charges they incurred were fraudulent and made without their knowledge or consent. The financial institutions then removed the charges at issue from the credit card bills or account statements for the debit cards.

9. BRADY himself successfully and unsuccessfully filed applications for credit cards, making false representations about his income and employment.

10. On March 11, 2016, BRADY successfully obtained credit card number xxxx xxxx xxxx 3612 from Discover Bank with a credit line of \$2,500.

11. Between March 12 and March 31, 2016, BRADY made purchases totaling over \$5,600 on credit card number xxxx xxxx xxxx 3612. BRADY was able to exceed the credit limit on that card by making purchases while payments were pending that were later rejected because of insufficient funds in the account used for payment. BRADY defaulted on this debt.

#### **Victim 2**

12. Victim 2 is a resident of Illinois with whom BRADY engaged in on-line sexual activity when she was sixteen years old. In or around September 2018, BRADY, using the false persona “Theo Schwarzman,” re-initiated contact with Victim 2, who was then a college freshman. “Theo Schwarzman” told Victim 2 that BRADY was a friend of “Schwarzman’s,” and that if she did not send BRADY money, “Schwarzman” would expose videos of Victim 2 engaged in sexually explicit activity. “Schwarzman” also claimed that he could intervene with federal immigration authorities to assist some of Victim 2’s family members, who were not United States citizens, with changing their immigration status, and provide other financial assistance to Victim 2 and her family.

13. Thereafter, acting at “Schwarzman’s” direction, Victim 2 made periodic payments to BRADY using Walmart payment transfer systems.

14. Acting at “Schwarzman’s” direction, Victim 2 allowed BRADY to make purchases using a debit card number issued in connection with her account numbered xxxxx3869 at JP Morgan Chase Bank. On December 10, 2018, Victim 2 also opened new accounts numbered xxxxx5935 and -6363 with JP Morgan Chase Bank for BRADY to use.

15. BRADY successfully used Victim 2's debit card number xxxxx3869 to purchase goods and services. Thereafter, acting at BRADY's request, Victim 2 falsely reported to JP Morgan Chase Bank that those purchases were fraudulent and had been made without her knowledge and consent.

### **Victim 3**

16. Victim 3 is a resident of New Jersey who lived in New York City. In or around Fall 2018, BRADY, using the false persona "Theo Schwarzman," had on-line contact with Victim 3 though "Seeking Arrangements." In or around November 2018, "Schwarzman" told Victim 3 that BRADY was a friend of "Schwarzman's," and that if she did not act as BRADY's personal assistant and make purchases of clothing and other items for BRADY, "Schwarzman" would expose Victim 3's involvement in on-line dating websites to Victim 3's father.

17. Thereafter, acting at "Schwarzman's" direction, Victim 3 purchased approximately \$1,300 worth of clothing at a Nordstrom Rack store in New York City for BRADY and shipped the clothing to BRADY's home address, 19820 Oak River Drive, South Chesterfield, Virginia 23803 using United Parcel Service.

18. Acting at "Schwarzman's" direction, Victim 3 added BRADY to her American Express credit cards numbered 2-6005 and 5-62004 and also created other American Express accounts for use in the scheme.

19. BRADY successfully used Victim 3's American Express accounts, including 5-62004, to purchase goods and services. Thereafter, acting at BRADY's request, Victim 3 falsely reported to American Express that those purchases were fraudulent and had been made without her knowledge and consent.

20. In December 2018, Victim 3 unsuccessfully applied for a Discover Card, falsely reporting that she was employed with Investment Group A, and that her annual income there was \$144,000.

21. On December 19, 2018, Victim 3 successfully applied for JP Morgan Chase Bank account number xxxxx9587, falsely reporting that that her annual income was \$144,000. On December 21, 2018, BRADY was added as an authorized user to account number xxxxx9587. Between December 24 and 29, 2018, BRADY incurred over \$8,000 worth of charges that Victim 3 later reported as fraudulent.

#### **Victim 4**

22. Victim 4 is a resident of Ohio who also attends college in that state at University A. BRADY, using the false persona “Theo Schwarzman,” had on-line contact with Victim 4 though “Seeking Arrangements,” and BRADY also met her in-person using that persona. “Schwarzman” told Victim 4 that he was an attorney, while also relating to her that he was enrolled in classes at Carnegie Mellon University in Pittsburgh, Pennsylvania. “Schwarzman” promised Victim 4 that he would assist her with paying her tuition, various student fees, and procuring an apartment for her.

23. Victim 4 provided “Schwarzman” with her social security number and also provided him with her debit card number xxxxx6176 for her account numbered xxxx0121 with JP Morgan Chase Bank. Furthermore, Victim 4 registered in her name a telephone assigned the number 646-xxx-xx36 for “Schwarzman’s” use.

24. As of February 2020, Victim 4 had an outstanding balance of 767.78 with University A. “Schwarzman” convinced Victim 4 to place a waiver on file with University A’s Office of Financial Aid so “Schwarzman” could discuss her outstanding balance with that office.

“Schwarzman” then contacted University A’s Office of Financial Aid, specifically identifying himself as the son of Person A, the CEO of Investment Group A. “Schwarzman” stated that he was seeking financial aid for Victim 4 and requested that she be awarded one of several scholarships. “Schwarzman” also advised that his family intended to fund a substantial scholarship at University A. When the financial aid officer inquired why “Schwarzman” didn’t simply pay Victim 4’s balance directly, “Schwarzman” falsely replied that Victim 4’s father worked for him, and was too proud to allow “Schwarzman” to make the payment directly. The financial aid officer ultimately provided funds to satisfy Victim 4’s debt. “Schwarzman” did not provide the promised scholarship.

25. BRADY used Victim 4’s debit card on JP Morgan Chase Bank account number xxxxx0121 to purchase goods and services. Victim 4 subsequently contacted JP Morgan Chase Bank and claimed that the transactions were made without her knowledge or consent.

**COUNT ONE**

(Production of Child Pornography)

From on or about December 29, 2015, to on or about June 12, 2016, in the Eastern District of Virginia and within the jurisdiction of this Court, defendant JOSHUA CLAYTON BRADY, also known as “Joshua Weston” and “Theo Schwarzman,” employed, used, persuaded, induced, enticed, and coerced a minor (Victim 1) to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct and for the purpose of transmitting a live visual depiction of such conduct, knowing or having reason to know that such visual depiction would be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed; and that visual depiction was produced or transmitted using materials that have been mailed, shipped, or

transported in or affecting interstate or foreign commerce by any means, including by computer; and such visual depiction has actually been transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed.

(In violation of Title 18, United States Code, Section 2251(a).)

**COUNT TWO**  
(Receipt of Child Pornography)

From on or about December 29, 2015, to on or about June 12, 2016, in the Eastern District of Virginia, defendant JOSHUA CLAYTON BRADY, also known as “Joshua Weston” and “Theo Schwarzman,” did knowingly receive one or more visual depictions that had been mailed, and using any means or facility of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, where the production of such visual depiction(s) involved the use of a minor (Victim 1) engaging in sexually explicit conduct as defined by Title 18, United States Code, Section 2256(2)(A), and the visual depiction(s) was of such conduct.

(In violation of Title 18, United States Code, Section 2252A(a)(2)(A).)

**COUNT THREE**  
(Production of Child Pornography)

From on or about February 15, 2016, to on or about June 18, 2016, in the Eastern District of Virginia and within the jurisdiction of this Court, defendant JOSHUA CLAYTON BRADY, also known as “Joshua Weston” and “Theo Schwarzman,” employed, used, persuaded, induced, enticed, and coerced a minor (Victim 2) to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct and for the purpose of transmitting a live visual depiction of such conduct, knowing or having reason to know that such visual depiction would be transported or transmitted using any means or facility of interstate or foreign



commerce or in or affecting interstate or foreign commerce or mailed; and that visual depiction was produced or transmitted using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer; and such visual depiction has actually been transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed.

(In violation of Title 18, United States Code, Section 2251(a).)

**COUNT FOUR**  
(Receipt of Child Pornography)

From on or about February 15, 2016, to on or about June 18, 2016, in the Eastern District of Virginia defendant JOSHUA CLAYTON BRADY, also known as “Joshua Weston” and “Theo Schwarzman,” did knowingly receive one or more visual depictions that had been mailed, and using any means or facility of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, where the production of such visual depiction(s) involved the use of a minor (Victim 2) engaging in sexually explicit conduct as defined by Title 18, United States Code, Section 2256(2)(A), and the visual depiction(s) was of such conduct.

(In violation of Title 18, United States Code, Section 2252A(a)(2)(A).)

**COUNT FIVE**  
(Receipt of Child Pornography)

From on or about September 27, 2015, to on or about October 6, 2015, in the Eastern District of Virginia defendant JOSHUA CLAYTON BRADY, also known as “Joshua Weston” and “Theo Schwarzman,” did knowingly receive one or more visual depictions that had been mailed, and using any means or facility of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by

computer, where the production of such visual depiction(s) involved the use of a minor (Victim 5) engaging in sexually explicit conduct as defined by Title 18, United States Code, Section 2256(2)(A), and the visual depiction(s) was of such conduct.

(In violation of Title 18, United States Code, Section 2252A(a)(2)(A).)

**COUNT SIX**  
(Mail Fraud)

1. The Introductory Allegations in paragraphs 1-25 are realleged and incorporated by reference as if fully set forth here.

2. On or about December 20, 2018, to execute and attempt to execute the scheme and artifice to defraud described above, defendant JOSHUA CLAYTON BRADY, also known as “Joshua Weston” and “Theo Schwarzman,” caused Victim 3 to send various items of clothing purchased in New York, New York, for delivery by United Parcel Service, a commercial interstate carrier, to BRADY at 19820 Oak River Drive, South Chesterfield, Virginia 23803 in the Eastern District of Virginia.

(In violation of Title 18, United States Code, Section 1341.)

**COUNTS SEVEN THROUGH TEN**  
(Wire Fraud)

1. The Introductory Allegations in paragraphs 1-25 are realleged and incorporated by reference as if fully set forth here.

2. On or about the following dates, in the Eastern District of Virginia and within the jurisdiction of this Court, as well as elsewhere, for the purpose of executing and attempting to execute the scheme and artifice to defraud, defendant JOSHUA CLAYTON BRADY, also known as “Joshua Weston” and “Theo Schwarzman,” caused Victim 2 to send and deliver in

interstate and foreign commerce via wire communication the signs, signals, and writings set forth below:

Count	Approximate Date	Wire Communication
7	10/1/2018	Transfer of \$1,000 via Walmart Ria from Walmart in Forest Park, Illinois to BRADY at Walmart in Newport News, Virginia
8	10/25/2018	Transfer of \$400 via Walmart Ria from Walmart in Forest Park, Illinois to BRADY at Walmart in Petersburg, Virginia
9	10/29/2018 <i>MLM</i>	Transfer of \$392 via Walmart Ria from Walmart in Forest Park, Illinois to BRADY at Walmart in Colonial Heights, Virginia
10	11/21/2018 <i>HD</i>	Transfer of \$392 via Walmart Ria from Walmart in Forest Park, Illinois to BRADY at Walmart in Colonial Heights, Virginia

(In violation of Title 18, United States Code, Section 1343.)

**COUNTS ELEVEN THROUGH EIGHTEEN**  
(Bank Fraud)

1. The Introductory Allegations in paragraphs 1-25 are realleged and incorporated by reference as if fully set forth here.
  
2. Beginning prior to March 2016 and continuing through on or about January 2020, the exact dates being unknown to the Grand Jury, in the Eastern District of Virginia and within the jurisdiction of this Court, as well as elsewhere, defendant JOSHUA CLAYTON BRADY, also known as “Joshua Weston” and “Theo Schwarzman,” did knowingly, unlawfully, and with intent to defraud, execute and attempt to execute a scheme and artifice to defraud and to obtain money, funds, and property owned by and under the custody and control of Discover Bank, JP Morgan Chase Bank, and American Express, all of which are financial institutions (as that term is defined in Title 18, United States Code, Section 20), by means of materially false and fraudulent pretenses and promises.

**Execution of the Scheme and Artifice to Defraud**

On or about the dates set forth below, to execute and attempt to execute the scheme and artifice to defraud, BRADY committed and caused the commission of the following acts in the Eastern District of Virginia:

<b>Count</b>	<b>Date</b>	<b>Description of Transaction</b>
11	3/7/2016	Credit card application to Discover Bank falsely claiming employment at Whittington Investments and annual income of \$480,000
12	11/13/2018	Purchase in amount of \$26.22 at Panda Express in Richmond, Virginia using Victim 2's JP Morgan Chase Bank account number xxxxx3869
13	12/7/2018	Purchase in amount of \$51.86 at Valentino's Pizza in Richmond, Virginia using Victim 2's JP Morgan Chase Bank account number xxxxx3869
14	12/21/2018	Purchase in amount of \$776.54 at Best Buy in Colonial Heights, Virginia using Victim 3's American Express account number xxxxx5-62004
15	12/24/2018	Purchase in amount of \$3,256.33 at Best Buy in Colonial Heights, Virginia using Victim 3's JP Morgan Chase Bank account number xxxxx9587
16	7/12/2019	Credit card application to Discover Bank falsely claiming employment at Whittington Investments and annual income of \$118,000
17	10/12/2019	Credit card application to Discover Bank falsely claiming annual income of \$240,000
18	12/23/2019	Purchase in amount of \$25.71 through Postmates using Victim 4's JP Morgan Chase Bank Card account number xxxxx6176

(In violation of Title 18, United States Code, Section 1344.)

**COUNTS NINETEEN THROUGH TWENTY-ONE**

(Aggravated Identity Theft)

On or about the dates set forth below, in the Eastern District of Virginia and within the jurisdiction of this Court, as well as elsewhere, defendant JOSHUA CLAYTON BRADY, also

known as “Joshua Weston” and “Theo Schwarzman,” did knowingly and unlawfully possess and use, without lawful authority, the means of identification of others (set forth in more detail below), during and in relation to violations of Title 18, United States Code, Section 1344, as charged in Counts Eleven through Eighteen of this Superseding Indictment:

Count	Date	Means of Identification
19	12/7/2018	Victim 2’s JP Morgan Chase Bank account number xxxxx3869
20	12/24/2018	Victim 3’s JP Morgan Chase Bank account number xxxxx9587
21	12/23/2019	Victim 4’s JP Morgan Chase Bank Card account number xxxxx6176

(In violation of Title 18, United States Code, Section 1028A(a)(1).)

#### **FORFEITURE NOTICE**

Pursuant to Rule 32.2(a) FED. R. CRIM. P., the defendant is notified that:

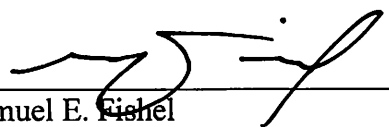
1. If convicted of any of any of Counts One through Five the defendant shall forfeit to the United States his interest in any visual depiction produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Sections 2251 *et seq.*, and any property, real or personal, constituting or traceable to gross profits or other proceeds, or used or intended to be used to commit or promote the commission of such offense(s), including, but not limited to the following: **One (1) Asus Laptop, black in color, model number X555L.**
2. If convicted of any of Counts Six through Eighteen, the defendant shall forfeit to the United States any property constituting, or derived from, proceeds obtained directly or indirectly as the result of such violations.
3. If the property subject to forfeiture cannot be located, the United States will seek an order forfeiting substitute assets.

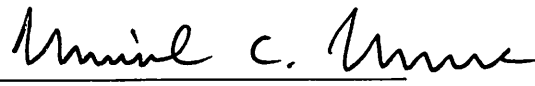
(All in accordance with Title 18, United States Code, Sections 982(a)(2) and 981(a)(1)(C) as incorporated by 28 U.S.C. § 2461(c) and Section 2253 and Title 21 United States Code Section 853(p).)

A TRUE BILL:

  
FOREPERSON

RAJ PAREKH  
ACTING UNITED STATES ATTORNEY

By:   
Samuel E. Fishel  
Special Assistant United States Attorney

  
Michael C. Moore  
Assistant United States Attorney