

FILED

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION

2020 JUN 17 PM 5:52

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO, FLORIDA

UNITED STATES OF AMERICA

v.

CASE NO. 6:20-cr-97-Orl-31LRH

18 U.S.C. § 2261A(2)

JOEL MICAH GREENBERG

18 U.S.C. § 1028(a)(7)

**INDICTMENT**

The Grand Jury charges:

**COUNT ONE**

**(Stalking)**

**A. Introduction**

At times relevant to this Indictment:

1. The defendant, JOEL MICAH GREENBERG, was the elected Tax Collector of Seminole County, Florida, in the Middle District of Florida. JOEL MICAH GREENBERG used the mail, an interactive computer service, an electronic communication service, an electronic communication system of interstate commerce, and a facility of interstate commerce to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to a political opponent who worked at a school located in the Middle District of Florida (referred to herein as the “school employee”).

2. JOEL MICAH GREENBERG caused letters to be sent by the United States Mail to the school located in the Middle District of Florida where the school employee worked. The letters falsely represented that they were being sent by an anonymous “very concerned student” of the school who had information that the school employee had engaged in sexual misconduct with a particular student, when in truth and in fact, as JOEL MICAH GREENBERG then and there well knew, the allegations were false.

3. JOEL MICAH GREENBERG caused a Twitter account to be set up using the name and photograph of the school employee. JOEL MICAH GREENBERG caused postings to be made using that account that represented that the school employee was a segregationist and in favor of white supremacy, when in truth and in fact, as JOEL MICAH GREENBERG then and there well knew, JOEL MICAH GREENBERG caused the Twitter account to be established without the school employee’s knowledge, consent, or authorization. The Internet was used to establish the Twitter account and to make the postings for that account.

4. JOEL MICAH GREENBERG caused a Facebook account to be set up that claimed to belong to a “very concerned teacher” at the school located in the Middle District of Florida where the school employee worked. JOEL MICAH GREENBERG caused postings to be made using that account that

alleged that the school employee had engaged in sexual misconduct with a student, when in truth and in fact, as JOEL MICAH GREENBERG then and there well knew, the allegations were false. The Internet was used to establish the Facebook account and to make the postings for that account.

5. Facebook and Twitter were each an interactive computer service, an electronic communication service, and an electronic communication system of interstate commerce. The Internet was a facility of interstate commerce.

**B. Course of Conduct**

6. Beginning on or about a date unknown to the Grand Jury, but not later than on or about October 10, 2019, and continuing through and including on or about November 15, 2019, in the Middle District of Florida, and elsewhere, the defendant,

**JOEL MICAH GREENBERG,**

with the intent to harass and intimidate, did knowingly use the mail, an interactive computer service, an electronic communication service, an electronic communication system of interstate commerce, and a facility of interstate commerce to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to a person, that is, the school employee.

In violation of 18 U.S.C. § 2261A(2) and 18 U.S.C. § 2.

**COUNT TWO**

**(Unlawful Use of Means of Identification of Another Person)**

1. The Grand Jury hereby realleges paragraphs one through five of Count One of this Indictment and incorporates such paragraphs by this reference as though fully set forth herein.

2. On or about November 2, 2019, in the Middle District of Florida, and elsewhere, the defendant,

**JOEL MICAH GREENBERG,**

did knowingly transfer, possess, and use in and affecting interstate commerce, without lawful authority, a means of identification of another person, specifically, the name of the school employee on a Twitter account, knowing that such means of identification belonged to an actual person, with the intent to commit, to aid and abet, and in connection with, any unlawful activity that constitutes a violation of Federal law, namely, a violation of 18 U.S.C. § 2261A(2), as charged in Count One of this Indictment.

In violation of 18 U.S.C. § 1028(a)(7) and 18 U.S.C. § 2.

**FORFEITURE**

1. The allegations contained in Count Two are incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. §§ 982(a)(2)(B) and 1028(b)(5).

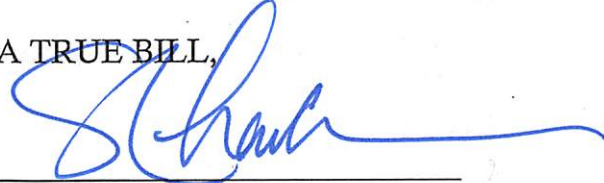
2. Upon conviction of a violation of 18 U.S.C. § 1028, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(B), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation, and pursuant to 18 U.S.C. § 1028(b)(5), any personal property used or intended to be used to commit the offense.

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,


the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. §§ 982(b)(1) and 1028(g).


A TRUE BILL,



Foreperson

MARIA CHAPA LOPEZ  
United States Attorney

By:   
Roger B. Handberg  
Assistant United States Attorney  
Chief, Orlando Division

By:   
Josephine W. Thomas  
Assistant United States Attorney  
Chief, Criminal Division

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**UNITED STATES DISTRICT COURT**  
Middle District of Florida  
Orlando Division

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THE UNITED STATES OF AMERICA

vs.

JOEL MICAH GREENBERG

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**INDICTMENT**

Violations:

18 U.S.C. § 2261A(2)  
18 U.S.C. § 1028(a)(7)

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A true bill,

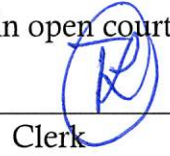


\_\_\_\_\_  
Foreperson

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Filed in open court this 17th day of June, 2020.



\_\_\_\_\_  
Clerk

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Bail \$ \_\_\_\_\_

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