

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 10-  
 :  
 v. :  
 :  
 VLADE STOJCHEVSKI : 18 U.S.C. §§ 1343, 2

I N F O R M A T I O N

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges:

- 1. At various times relevant to this Information:
  - a. Defendant VLADE STOJCHEVSKI ("defendant" or "STOJCHEVSKI") was a resident of Lake Hiawatha, New Jersey.
  - b. "D & L" was a law firm headquartered in New York, New York, with several international offices, including an office in Moscow, Russia.
  - c. Alfa Bank was a privately-owned Russian bank.

THE SCHEME TO DEFRAUD

2. From at least in or about January 2007 through at least in or about March 2009, in the District of New Jersey and elsewhere, the defendant

VLADE STOJCHEVSKI

knowingly and intentionally devised and intended to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be

transmitted by means of wire, radio, or television communication in interstate or foreign commerce, a writing, sign, signal, picture, and sound for the purpose of executing such scheme or artifice.

THE OBJECT OF THE SCHEME TO DEFRAUD

3. The primary object of the scheme and artifice was for defendant VLADE STOJCHEVSKI to induce victim J.K., through various false representations and promises, to invest money with STOJCHEVSKI. Rather than investing J.K.'s money, STOJCHEVSKI kept and used J.K.'s monies for his personal use.

THE MANNER AND MEANS OF THE SCHEME TO DEFRAUD

4. Among the manner and means used by defendant VLADE STOJCHEVSKI to carry out his scheme to defraud were those set forth in paragraphs 5 through 10 below:

a. J.K.'s Initial Investment - 1998 and 1999

5. In or about December 1998, STOJCHEVSKI represented to J.K. that he was a broker soliciting investments. In reliance upon STOJCHEVSKI'S representations, J.K. provided STOJCHEVSKI with a \$10,000 bank check dated December 24, 1998, a \$17,000 bank check dated January 21, 1999, and \$5,000 in cash.

6. STOJCHEVSKI thereafter informed J.K. that he had invested J.K.'s funds in various investments in Russia. On several occasions thereafter, J.K. inquired of STOJCHEVSKI regarding the status of his investment, and STOJCHEVSKI assured

J.K. that the investment was secure. In fact, by as early as approximately 2001, STOJCHEVSKI's investment of J.K.'s funds had failed and J.K.'s investment was practically worthless.

b. STOJCHEVSKI Solicits Additional Investments - 2007-2009

7. In approximately 2007, STOJCHEVSKI incurred several outstanding debts he was unable to pay, including attorney's fees, child support payments, and personal loans. As a result, STOJCHEVSKI solicited further monies from J.K. In order to accomplish this, STOJCHEVSKI told J.K. that J.K.'s initial investment from 1998 and 1999 had performed well and multiplied exponentially, but the investment was under the control of the Russian government. As a result, STOJCHEVSKI told J.K. that in order to recover J.K.'s investment, he needed more money from J.K. to pay off liens and debts that had been placed on J.K.'s account.

8. In order to induce J.K. to pay him further monies, STOJCHEVSKI perpetrated various frauds and deceits:

Impersonation of D & L

a. In or around 2007, STOJCHEVSKI falsely told J.K. that he had hired D & L to counsel and assist J.K. and STOJCHEVSKI in reclaiming J.K.'s investment, and that STOJCHEVSKI needed money from J.K. to help pay the attorney's fees. In order to further perpetrate his scheme, STOJCHEVSKI opened a bank account in the name of D & L at a Citibank branch in Fort Lee,

New Jersey. STOJCHEVSKI thereafter asked J.K. to make checks payable to D & L.

b. In order to perpetrate his scheme, Defendant STOJCHEVSKI created false D & L documentation, including false D & L letterhead and correspondence appearing to be authored by an actual member of the firm. Some of these letters referenced a false account number at Alfa Bank and falsely advised J.K. that, among other things, the firm had conducted an investigation of his account, and that his funds would be released once he paid off the fees and liens owed to Alfa Bank. These letters were intended to, and resulted in, J.K. paying STOJCHEVSKI further monies.

c. As a result of STOJCHEVSKI's misrepresentations, J.K. thereafter made and arranged for several payments to D & L. For example, in 2008, J.K.'s parents, T.K. and K.K., wrote two checks to D & L on J.K.'s behalf; one check for \$150,000, and another for \$50,000. J.K. gave these checks to STOJCHEVSKI, who deposited the checks into the D & L account he had opened, and used these monies for personal expenses and debt.

#### Impersonation of Alfa Bank

9. As part of STOJCHEVSKI's efforts to further his fraud, STOJCHEVSKI falsely impersonated employees of Alfa Bank. Defendant STOJCHEVSKI created false Alfa Bank documentation,

including false letterhead and correspondence appearing to be authored by an actual Alfa Bank employee.

10. Some of these letters STOJCHEVSKI drafted made it appear that J.K.'s investment was being held in an account at Alfa Bank. Furthermore, these letters referenced a false account number at Alfa Bank and informed J.K. that the money in his account would not be released until certain "liens" were paid off. In reliance thereon, J.K. thereafter arranged for payments to be made to D & L, which STOJCHEVSKI then used for his own benefit.

11. On or about February 26, 2009, for the purpose of executing the scheme and artifice described above, and attempting to do so, in the District of New Jersey and elsewhere, defendant

VLADimir STOJCHEVSKI

did knowingly and willfully cause to be transmitted by means of wire \$150,000 from the bank account of J.K.'s parents, T.K and K.K., by depositing a check from their checking account, maintained in East Meadow, New York, to his D & L account, maintained in Fort Lee, New Jersey.

All in violation of Title 18, United States Code, Sections 1343 and 2.

  
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PAUL J. FISHMAN  
United States Attorney

CASE NUMBER: 2009R00935

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District of New Jersey**

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**UNITED STATES OF AMERICA**

**v.**

**VLAD E STOJCHEVSKI**

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**INFORMATION**

18 U.S.C. §§ 1343 and 2

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**PAUL J. FISHMAN**

*U. S. ATTORNEY*

*NEWARK, NEW JERSEY*

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**JOSEPH MACK**

*ASSISTANT U. S. ATTORNEY*

*NEWARK, NEW JERSEY*

*(973) 645-2824*

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