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11  
12 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 vs.

16 JORGE ABRAMOVS,

17 Defendant.

**CRIMINAL INDICTMENT**

Case No.: 2:21-cr-27

**VIOLATIONS:**

18 U.S.C. § 1344(2) – Bank Fraud;

18 U.S.C. § 1014 – False Statement to a  
Financial Institution; and

18 U.S.C. § 1957 – Monetary Transactions  
in Criminally Derived Property.

**FORFEITURE ALLEGATIONS**

21  
22  
23 **THE GRAND JURY CHARGES THAT:**  
24

**Background Allegations**

At all times relevant to the Indictment, unless otherwise stated:

1. Defendant JORGE ABRAMOVS (“ABRAMOV”) was a United States citizen, residing in Las Vegas, Nevada.

2. National Investment Group Corporation (“NIGC”) was a domestic corporation formed in the State of Nevada in 2018. Nevada Secretary of State records identified ABRAMOVS as the President, Secretary, Treasurer, and Director of NIGC until on or about October 14, 2020, when a different individual was identified as Secretary and Treasurer with ABRAMOVS still listed as President.

3. National Legal Advisors In Care Corp. (“NLA”) was a domestic corporation formed in the State of Nevada in 2019. Nevada Secretary of State records identified ABRAMOVS as the President, Secretary, Treasurer, and Director of NLA as of on or about July 1, 2019 through at least January 22, 2021. As discussed below, Abramovs submitted loan applications on behalf of NLA and entities with similar names.

4. Financial Institutions A through G (the “Financial Institutions”) were all financial institutions as defined by Title 18, United States Code, Section 20. Deposits at Financial Institutions A, B, D, E, F, and G were insured by the Federal Deposit Insurance Fund. Deposits at Financial Institution C were insured by the National Credit Union Share Insurance Fund.

5. ABRAMOVS controlled, and had sole signatory authority over, Financial Institution F account ending in 9757, Financial Institution F account ending in 9732, and Financial Institution F account ending in 9740, among other accounts.

Paycheck Protection Program

1  
2           6.       The Coronavirus Aid, Relief, and Economic Security (“CARES”) Act was a  
3 federal law enacted in or around March 2020 and designed to provide emergency financial  
4 assistance to the millions of Americans who are suffering the economic effects caused by  
5 the COVID-19 pandemic. One source of relief provided by the CARES Act was the  
6 authorization of up to \$349 billion in forgivable loans to small businesses for job retention  
7 and certain other expenses, through a program referred to as the Paycheck Protection  
8 Program (“PPP”).

9           7.       In order to obtain a PPP loan, a qualifying business submitted a PPP loan  
10 application, which was signed by an authorized representative of the business. The PPP  
11 loan application required the business (through its authorized representative) to  
12 acknowledge the program rules and make certain affirmative certifications in order to be  
13 eligible to obtain the PPP loan. In the PPP loan application, the small business (through its  
14 authorized representative) was required to state, among other things, its: (a) average  
15 monthly payroll expenses; and (b) number of employees. These figures were used to  
16 calculate the amount of money the small business was eligible to receive under the PPP. In  
17 addition, businesses applying for a PPP loan were required to provide documentation  
18 showing their payroll expenses.

19           8.       A PPP loan application was processed by a participating lender, such as a  
20 financial institution. If a PPP loan application was approved, the participating lender  
21 funded the PPP loan using its own monies. While the lender issued the PPP loan, the  
22 Small Business Administration (“SBA”) provided a guarantee to the lender for the PPP  
23 loan. Data from the application, including information about the borrower, the total  
24

1 amount of the loan, and the listed number of employees, was transmitted by the lender to  
2 the SBA in the course of processing the loan.

3 9. PPP loan proceeds were required to be used by the business on certain  
4 permissible expenses—payroll costs, interest on mortgages, rent, and utilities. The PPP  
5 allowed the interest and principal on the PPP loan to be entirely forgiven if the business  
6 spent the loan proceeds on these expense items within a designated period of time and used  
7 a certain percentage of the PPP loan proceeds on payroll expenses.

8 **The Scheme to Defraud**

9 10. Beginning in or around April 2020 and continuing until at least in or around  
10 June 2020, ABRAMOVS knowingly executed, and attempted to execute, a scheme and  
11 artifice to obtain the money and property owned by, and under the custody and control of,  
12 Financial Institutions, namely, Financial Institutions A-G, by means of materially false and  
13 fraudulent pretenses, representations, and promises, as further described below.

14 **Purpose of the Scheme to Defraud**

15 11. It was the purpose of the scheme for ABRAMOVS to unjustly enrich himself  
16 and others by fraudulently obtaining PPP loan proceeds.

17 **Manner and Means of the Scheme to Defraud**

18 12. It was part of the scheme that from on or about April 16, 2020 until at least  
19 on about June 15, 2020, ABRAMOVS submitted at least six applications for PPP loans for  
20 NIGC. On each loan application, ABRAMOVS provided an EIN, number of employees,  
21 and average monthly payroll for NIGC.

22 13. It was further part of the scheme that between on or about May 10, 2020 and  
23 on or about June 5, 2020, ABRAMOVS submitted at least five more applications for PPP  
24 loans on behalf of NLA or an entity with a similar name, such as National Legal Advisors

1 or National Legal Advisors in Care (collectively, "the NLA entities"). ABRAMOVS signed  
2 each of the loan applications as the authorized representative of the NLA entities. On each  
3 loan application, ABRAMOVS provided an EIN, number of employees, and average  
4 monthly payroll for the NLA entities.

5 14. On or about June 15, 2020, ABRAMOVS submitted a PPP loan application  
6 to Financial Institution G using the entity name of National Investment Group.

7 ABRAMOVS signed the loan application as the authorized representative of National  
8 Investment Group. On the loan application, ABRAMOVS provided an EIN, number of  
9 employees and average monthly payroll for National Investment Group.

10 15. In order to qualify for the above loans, ABRAMOVS submitted materially  
11 false information about NIGC and NLA, including the number of employees and average  
12 monthly payroll of the businesses. At times, ABRAMOVS also submitted false and  
13 fraudulent supporting documentation with the loan applications, including fraudulent tax  
14 documents. ABRAMOVS falsely certified that the loan proceeds would be used retain  
15 workers and maintain payroll or make mortgage interest payments, lease payments, and  
16 utility payments, when in fact ABRAMOVS intended to use the funds for personal  
17 expenses.

18 16. In addition, on each loan application, ABRAMOVS certified that during the  
19 period beginning on or about February 15, 2020 and ending on or about December 1, 2020,  
20 the Applicant had not and would not receive another loan under the PPP. Instead, contrary  
21 to these certifications, ABRAMOVS received multiple loans in the name of NIGC and  
22 multiple loans in the name of NLA.

23 17. It was part of the scheme that, in order to obtain multiple PPP loans for the  
24 same company, ABRAMOVS and others known and unknown to the Grand Jury created

1 multiple EINs with the IRS, using different company names in order to obtain the EINs.  
2 ABRAMOVS then used the various EINs on the loan applications and falsely claimed that  
3 they were associated with the relevant business.

4 18. In total, ABRAMOVS received approximately \$1,986,737 in PPP funds via  
5 applications submitted to seven financial institutions.

6 19. ABRAMOVS spent proceeds of this fraud on luxury purchases for himself,  
7 including two condominiums located in the Veer Towers in Las Vegas, Nevada, the  
8 purchase of a 2020 Bentley, the purchase of a 2020 Tesla, and to pay off the mortgage on  
9 an existing home in Nevada.

10 **COUNTS ONE THROUGH FIVE**

11 *Bank Fraud*

(18 U.S.C. § 1344(2))

12 20. The allegations in paragraphs 1 through 19 are re-alleged and incorporated as  
13 if fully set forth herein.

14 21. From in or around April 2020 through at least in or around June 2020, in the  
15 State and Federal District of Nevada and elsewhere,

16 **JORGE ABRAMOVS,**

17 defendant herein, knowingly executed, and attempted to execute, a scheme and artifice to  
18 obtain moneys, funds, credits, assets, securities, and property owned by, and under the  
19 custody and control of, the Financial Institutions, by means of materially false and  
20 fraudulent pretenses, representations, and promises.

21 22. On or about the dates identified below, in the State and Federal District of  
22 Nevada, and elsewhere,

23 **JORGE ABRAMOVS,**

1 defendant herein, knowingly executed and attempted to execute the above-described  
 2 scheme, each execution constituting a separate violation of Title 18, United States Code,  
 3 Section 1344(2).

COUNT	APPROXIMATE DATE	DESCRIPTION OF EXECUTION
ONE	April 16, 2020	Submission to Financial Institution A of PPP loan application on the name of National Investment Group Corporation seeking a loan in the amount of \$134,662
TWO	May 21, 2020	Submission to Financial Institution B of PPP loan application in the name of National Legal Advisors In Care Corp., seeking a loan in the amount of \$136,200
THREE	May 22, 2020	Submission to Financial Institution B of PPP loan application in the name of National Investment Group Corporation seeking a loan in the amount of \$138,000
FOUR	June 1, 2020	Submission to Financial Institution C of PPP loan application in the name of National Legal Advisors seeking a loan in the amount of \$215,624
FIVE	June 2, 2020	Submission to Financial Institution D of PPP loan application in the name of National Investment Group Corporation seeking a loan in the amount of \$199,276.04

14 All in violation of Title 18, United States Code, Section 1344(2).

15 **COUNT SIX**

16 *False Statement to a Financial Institution*  
 (18 U.S.C. § 1014)

17 23. The allegations in paragraphs 1 through 19 are re-alleged and incorporated as  
 18 if fully set forth herein.

19 24. On or about May 25, 2020, in the State and Federal District of Nevada,

20 **JORGE ABRAMOV,**

21 defendant herein, knowingly made a false statement and report for the purposes of  
 22 influencing the action of a financial institution, namely, Financial Institution E, whose  
 23 accounts were insured by the Federal Deposit Insurance Corporation, upon an application,  
 24 agreement, and loan, to wit: false statements on a Borrower Application Form for a

1 \$93,403.16 loan under the Paycheck Protection Program from Financial Institution E about  
 2 the number of employees, the amount of monthly payroll, the EIN and tax filing history for  
 3 ABRAMOV'S' business, National Investment Group Corporation, and the intended use of  
 4 the loan proceeds, in violation of Title 18, United States Code, Section 1014.

5 All in violation of Title 18, United States Code, Section 1014.

6 **COUNTS SEVEN THROUGH ELEVEN**  
 7 Monetary Transactions in Criminally Derived Property  
 8 (18 U.S.C. § 1957)

9 25. The allegations in paragraphs 1 through 19 are re-alleged and incorporated as  
 10 if fully set forth herein.

11 26. From in or around April 2020 through at least in or around August 2020, in  
 12 the State and Federal District of Nevada and elsewhere,

13 **JORGE ABRAMOV'S,**

14 defendant herein, knowingly engaged and attempted to engage in the following monetary  
 15 transactions by, through, and to a financial institution, in and affecting interstate and  
 16 foreign commerce, in criminally derived property of a value greater than \$10,000, that is  
 17 the deposit, withdrawal, transfer, and exchange of United States currency, such property  
 18 constituting and having been derived from a specified unlawful activity, that is, the bank  
 19 fraud scheme and artifice alleged herein in paragraphs 1 through 19, in violation of 18  
 20 U.S.C. § 1344(2), all in violation of Title 18, United States Code, Section 1957:

COUNT	APPROXIMATE DATE	DESCRIPTION OF TRANSACTION
SEVEN	May 29, 2020	\$222,638.59 wire from Financial Institution F account ending in 9732 to Lawyer's Title of Nevada Inc
EIGHT	June 1, 2020	\$251,024.21 wire from Financial Institution F account ending in 9732 to Towbin Motorcars.



1	NINE	June 9, 2020	\$403,906.29 wire from Financial Institution F account ending in 9740 to Lawyer's Title of Nevada Inc
2	TEN	June 16, 2020	\$95,000 Electronic Withdrawal from Financial Institution F account ending in 9757 to PENNYMAC
3	ELEVEN	June 19, 2020	\$54,804.25 Electronic Withdrawal from Financial Institution F account ending in 9732 to Tesla Motors.
4			
5			

6 All in violation of Title 18, United States Code, Section 1957

7 **FORFEITURE ALLEGATION ONE**

8 *Bank Fraud*

9 1. The allegations contained in Counts One through Five of this Criminal  
10 Indictment are hereby realleged and incorporated herein by reference for the purpose of  
11 alleging forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) with 28 U.S.C. § 2461(c) and 18  
12 U.S.C. § 982(a)(2)(A).

13 2. Upon conviction of any of the felony offenses charged in Counts One  
14 through Five of this Criminal Indictment,

15 **JORGE ABRAMOV,**

16 defendant herein, shall forfeit to the United States of America, any property, real or  
17 personal, which constitutes or is derived from proceeds traceable to a violation of 18 U.S.C.  
18 § 1344, or a conspiracy to commit such offense:

19 defendant herein, shall forfeit to the United States of America, any property, real or  
20 personal, which constitutes or is derived from proceeds traceable to a violation of 18 U.S.C.  
21 § 1344, a specified unlawful activity as defined in 18 U.S.C §§ 1956(c)(7)(A) and  
22 1961(1)(B), or a conspiracy to commit such offense:

23 defendant herein, shall forfeit to the United States of America, any property  
24 constituting, or derived from, proceeds obtained directly or indirectly, as the result of

1 violations of 18 U.S.C. § 1344, or a conspiracy to violate such offense, affecting a financial  
2 institution:

- 3 1. an in personam criminal forfeiture money judgment including, but not  
4 limited to, at least \$1,986,737.46;
- 5 2. real property located at 3726 South Las Vegas Boulevard, Unit 509,  
6 Las Vegas, Nevada; and

7 MORE PARTICULARLY DESCRIBED AS:

8 PARCEL 1:

9 UNIT 509 IN BUILDING WEST IN VEER TOWERS, AS SHOWN ON THAT  
10 CERTAIN FINAL MAP OF THE VEER TOWERS, A RESORT  
11 CONDOMINIUM SUBDIVISION ON FILE IN BOOK 142 OF PLATS, PAGE 42  
12 AND AS SET FORTH IN THE DECLARATION OF COVENANTS,  
13 CONDITIONS, AND RESTRICTIONS AND RESERVATION OF  
14 EASEMENTS FOR VEER TOWERS RECORDED MAY 03, 2010 IN BOOK  
15 20100503 AS INSTRUMENT NO. 0002036, BOTH IN THE OFFICE OF THE  
16 COUNTY RECORDER, CLARK COUNTY, NEVADA.

14 PARCEL 2:

15 AN ALLOCATED INTEREST AS A TENANT-IN-COMMON IN THE  
16 COMMON ELEMENTS OF VEER TOWERS (INCLUDING ANY  
17 ANNEXATIONS THERETO), AS SHOWN BY THE MAP AND AS SET  
18 FORTH IN THE DECLARATION.

17 PARCEL 3:

18 AN EXCLUSIVE EASEMENT APPURTENANT TO PARCELS 1 AND 2  
19 DESCRIBED ABOVE, OVER AREAS DEFINED AND DESCRIBED AS  
20 LIMITED COMMON ELEMENTS, IF ANY, ALLOCATED TO PARCELS 1  
21 AND 2 IN THE DECLARATION AND AS SHOWN AND DELINEATED  
22 UPON THE MAP REFERRED TO ABOVE.

21 PARCEL 4:

22 NON-EXCLUSIVE EASEMENTS FOR ACCESS, INGRESS, EGRESS, USE AND  
23 OTHER PURPOSES ALL DESCRIBED IN THE DECLARATION AND IN THAT  
24 CERTAIN (A) DECLARATION OF CENTRAL PLANT EASEMENTS, DATED  
DECEMBER 01, 2009 AND RECORDED DECEMBER 01, 2009 IN BOOK  
20091201 AS INSTRUMENT NO. 0002884 OF OFFICIAL RECORDS, AND AS  
AMENDED BY THAT CERTAIN FIRST AMENDMENT TO DECLARATION

1 OF CENTRAL PLANT EASEMENTS, DATED JANUARY 07, 2010 AND  
2 RECORDED JANUARY 07, 2010 IN BOOK 20100107 AS INSTRUMENT NO.  
3 0000577 OF OFFICIAL RECORDS; (B) PARKING AND ACCESS AGREEMENT,  
4 DATED APRIL 28, 2010 AND RECORDED MAY 03, 2010 IN BOOK 20100503 AS  
5 INSTRUMENT NO. 0000515 OF OFFICIAL RECORDS; (C) DECLARATION OF  
6 SUPPORT AND ENCROACHMENT EASEMENTS, DATED DECEMBER 01,  
7 2009 AND RECORDED DECEMBER 01, 2009 IN BOOK 20091201 AS  
8 INSTRUMENT NO. 0002885 OF OFFICIAL RECORDS, AND AS AMENDED BY  
9 THAT CERTAIN FIRST AMENDMENT TO DECLARATION OF SUPPORT  
10 AND ENCROACHMENT EASEMENTS, DATED JANUARY 07, 2020 AND  
11 RECORDED JANUARY 07, 2010 IN BOOK 20100107 AS INSTRUMENT NO.  
12 0000578 OF OFFICIAL RECORDS; AND (D) DECLARATION OF LIFE SAFETY  
13 SYSTEMS EASEMENTS, DATED DECEMBER 01, 2009 AND RECORDED  
14 DECEMBER 01, 2009 IN BOOK 20091201 AS INSTRUMENT NO. 0002886 OF  
15 OFFICIAL RECORDS, AND AS AMENDED BY THAT CERTAIN FIRST  
16 AMENDMENT TO DECLARATION OF LIFE SAFETY SYSTEM EASEMENTS  
17 DATED JANUARY 07, 2010 AND RECORDED JANUARY 07, 2010 IN BOOK  
18 20100107 AS INSTRUMENT NO. 0000579 OF OFFICIAL RECORDS, AND ALL  
19 IMPROVEMENTS AND APPURTENANCES THEREON, APN: 162-20-714-020.

11 3. real property located at 3726 South Las Vegas Boulevard, Unit 1803,  
12 Las Vegas, Nevada

13 MORE PARTICULARLY DESCRIBED AS:

14 PARCEL I:

15 UNIT ONE THOUSAND EIGHT HUNDRED THREE (1803) IN BUILDING  
16 "W" IN VEER TOWERS, AS SHOWN ON THAT CERTAIN FINAL MAP OF  
17 THE VEER TOWERS, A RESORT CONDOMINIUM SUBDIVISION ON FILE  
18 IN BOOK 142 OF PLATS, PAGE 42 (THE "MAP") AND AS SET FORTH IN  
19 THE DECLARATION OF COVENANTS, CONDITIONS, AND  
20 RESTRICTIONS AND RESERVATION OF EASEMENTS FOR VEER  
21 TOWERS (THE "DECLARATION") RECORDED MAY 03, 2010 IN BOOK  
22 20100503 AS INSTRUMENT NO. 0002036, BOTH IN THE OFFICE OF THE  
23 COUNTY RECORDER, CLARK COUNTY, NEVADA (THE "OFFICIAL  
24 RECORDS").

21 PARCEL II:

22 AN ALLOCATED INTEREST AS A TENANT-IN-COMMON IN THE  
23 COMMON ELEMENTS OF VEER TOWERS (INCLUDING ANY  
24 ANNEXATIONS THERETO), AS SHOWN BY THE MAP AND AS SET  
FORTH IN THE DECLARATION.

1 PARCEL III:

2 AN EXCLUSIVE EASEMENT APPURTENANT TO PARCELS ONE (1) AND  
3 TWO (2) DESCRIBED ABOVE, OVER AREAS DEFINED AND DESCRIBED  
4 AS LIMITED COMMON ELEMENTS, IF ANY, ALLOCATED TO PARCELS  
ONE (1) AND TWO (2) IN THE DECLARATION AND AD SHOWN AND  
DELINEATED UPON THE MAP REFFERED TO ABOVE.

5 PARCEL IV:

6 NON-EXCLUSIVE EASEMENTS FOR ACCESS, INGRESS, EGRESS, USE AND  
7 OTHER PURPOSES ALL DESCRIBED IN THE DECLARATION AND IN THAT  
8 CERTAIN (A) DECLARTION OF CENTRAL PLANT EASEMENTS, DATED  
9 DECEMBER 01, 2009 AND RECORDED DECEMBER 01, 2009 IN BOOK  
10 20091201 AS INSTRUMENT NO. 0002884 OF OFFICIAL RECORDS, AND AS  
11 AMENDED BY THAT CERTAIN FIRST AMENDMENT TO DECLARATION  
12 OF CENTRAL PLANT EASEMENTS, DATED JANUARY 07, 2010 AND  
13 RECORDED JANUARY 07, 2010 IN BOOK 20100107 AS INSTRUMENT NO.  
14 0000577 OF OFFICIAL RECORDS; (B) PARKING AND ACCESS AGREEMENT,  
15 DATED APRIL 28, 2010 AND RECORDED MAY 03, 2010 IN BOOK 20100503 AS  
16 INSTRMENT NO. 0000515 OF OFFICIAL RECORDS; (C) DECLARATION OF  
17 SUPPORT AND ENCROACHMENT EASEMENTS, DATED DECEMBER 01,  
18 2009 AND RECORDED DECEMBER 01, 2009 IN BOOK 20091201 AS  
INSTRUMENT NO. 0002885 OF OFFICIAL RECORDS, AND AS AMENDED BY  
THAT CERTAIN FIRST AMENDMENT TO DECLARATION OF SUPPORT  
AND ENCROACHMENT EASEMENTS, DATED JANUARY 07, 2010 AND  
RECORDED JANUARY 07, 2010 IN BOOK 20100107 AS INSTRUMENT NO.  
0000578 OF OFFICIAL RECORDS; AND (D) DECLARATION OF LIFE SAFETY  
SYSTEMS EASEMENTS, DATED DECEMBER 1, 2009 AND RECORDED  
DECEMBER 1, 2009 IN BOOK 20091201 AS INSTRUMENT NO. 0002886 OF  
OFFICIAL RECORDS, AND AS AMENDED BY THAT CERTAIN FIRST  
AMENDMENT TO DECLARATION OF LIFE SAFETY SYSTEM EASEMENTS  
DATED JANUARY 07, 2010 AND RECORDED JANUARY 7, 2010 IN BOOK  
20100107 AS INSTRUMENT NO. 0000579, AND ALL IMPROVEMENTS AND  
APPURTENANCES THEREON, APN: 162-20-714-153.

19 (all of which constitutes property).

20 3. If any property being subject to forfeiture pursuant to 18 U.S.C. §  
21 981(a)(1)(C) with 28 U.S.C. § 2461(c) and 18 U.S.C. § 982(a)(2)(A), as a result of any act or  
22 omission of the defendant -

- 23 a. cannot be located upon the exercise of due diligence;
- 24 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;

it is the intent of the United States of America, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant for the property listed above.

All pursuant to 18 U.S.C. § 981(a)(1)(C) with 28 U.S.C. § 2461(c); 18 U.S.C. § 982(a)(2)(A); 18 U.S.C. § 1344; and 21 U.S.C. § 853(p).

**FORFEITURE ALLEGATION TWO**  
*False Statement to a Financial Institution*

1. The allegations contained in Count Six of this Criminal Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) with 28 U.S.C. § 2461(c) and 18 U.S.C. § 982(a)(2)(A).

2. Upon conviction of the felony offense charged in Count Six of this Criminal Indictment,

**JORGE ABRAMOV,**

defendant herein, shall forfeit to the United States of America, any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of 18 U.S.C. § 1014, or a conspiracy to commit such offense:

defendant herein, shall forfeit to the United States of America, any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of 18 U.S.C. § 1014, a specified unlawful activity as defined in 18 U.S.C. § 1956(c)(7)(D), or a conspiracy to commit such offense:

1 defendant herein, shall forfeit to the United States of America, any property  
2 constituting, or derived from, proceeds obtained directly or indirectly, as the result of  
3 violations of 18 U.S.C. § 1014, or a conspiracy to violate such offense, affecting a financial  
4 institution:

5 an in personam criminal forfeiture money judgment including, but not limited to, at  
6 least \$93,403.16 (property).

7 3. If any property being subject to forfeiture pursuant to 18 U.S.C. §  
8 981(a)(1)(C) with 28 U.S.C. § 2461(c) and 18 U.S.C. § 982(a)(2)(A), as a result of any act or  
9 omission of the defendant -

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

16 it is the intent of the United States of America, pursuant to 21 U.S.C. § 853(p), to seek  
17 forfeiture of any other property of the defendant for the property listed above.

18 All pursuant to 18 U.S.C. § 981(a)(1)(C) with 28 U.S.C. § 2461(c); 18 U.S.C. §  
19 982(a)(2)(A); 18 U.S.C. § 1014; and 21 U.S.C. § 853(p).

20 **FORFEITURE ALLEGATION THREE**  
21 *Engaging in Transactions in Unlawful Proceeds*

22 1. The allegations contained in Counts Seven through Eleven of this Criminal  
23 Indictment are hereby realleged and incorporated herein by reference for the purpose of  
24 alleging forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) with 28 U.S.C. § 2461(c); 18 U.S.C.

1 § 981(a)(1)(C) with 28 U.S.C. § 2461(c); and 18 U.S.C. § 982(a)(1).

2 2. Upon conviction of any of the felony offenses charged in Counts Seven  
3 through Eleven of this Criminal Indictment,

4 **JORGE ABRAMOV,**

5 defendant herein, shall forfeit to the United States of America, any property, real or  
6 personal, involved in transactions or attempted transactions in violation of 18 U.S.C. §  
7 1957, or any property traceable to such property:

8 defendant herein, shall forfeit to the United States of America, any property, real or  
9 personal, which constitutes or is derived from proceeds traceable to a violation of 18 U.S.C.  
10 § 1957, a specified unlawful activity as defined in 18 U.S.C §§ 1956(c)(7)(A) and  
11 1961(1)(B), or a conspiracy to commit such offense:

12 defendant herein, shall forfeit to the United States of America, any property, real or  
13 personal, involved in violations of 18 U.S.C. § 1957, or any property traceable to such  
14 property:

- 15 1. an in personam criminal forfeiture money judgment including, but not  
16 limited to, at least \$978,834.31;
- 17 2. real property located at 3726 South Las Vegas Boulevard, Unit 509,  
18 Las Vegas, Nevada; and

19 MORE PARTICULARLY DESCRIBED AS:

20 PARCEL 1:

21 UNIT 509 IN BUILDING WEST IN VEER TOWERS, AS SHOWN ON THAT  
22 CERTAIN FINAL MAP OF THE VEER TOWERS, A RESORT  
23 CONDOMINIUM SUBDIVISION ON FILE IN BOOK 142 OF PLATS, PAGE 42  
24 AND AS SET FORTH IN THE DECLARATION OF COVENANTS,  
CONDITIONS, AND RESTRICTIONS AND RESERVATION OF  
EASEMENTS FOR VEER TOWERS RECORDED MAY 03, 2010 IN BOOK

1 20100503 AS INSTRUMENT NO. 0002036, BOTH IN THE OFFICE OF THE  
2 COUNTY RECORDER, CLARK COUNTY, NEVADA.

3 PARCEL 2:

4 AN ALLOCATED INTEREST AS A TENANT-IN-COMMON IN THE  
5 COMMON ELEMENTS OF VEER TOWERS (INCLUDING ANY  
6 ANNEXATIONS THERETO), AS SHOWN BY THE MAP AND AS SET  
7 FORTH IN THE DECLARTION.

8 PARCEL 3:

9 AN EXCLUSIVE EASEMENT APPURTENANT TO PARCELS 1 AND 2  
10 DESCRIBED ABOVE, OVER AREAS DEFINED AND DESCRIBED AS  
11 LIMITED COMMON ELEMENTS, IF ANY, ALLOCATED TO PARCELS 1  
12 AND 2 IN THE DECLARATION AND AS SHOWN AND DELINEATED  
13 UPON THE MAP REFERRED TO ABOVE.

14 PARCEL 4:

15 NON-EXCLUSIVE EASEMENTS FOR ACCESS, INGRESS, EGRESS, USE AND  
16 OTHER PURPOSES ALL DESCRIBED IN THE DECLARATION AND IN THAT  
17 CERTAIN (A) DECLARTION OF CENTRAL PLANT EASEMENTS, DATED  
18 DECEMBER 01, 2009 AND RECORDED DECEMBER 01, 2009 IN BOOK  
19 20091201 AS INSTRUMENT NO. 0002884 OF OFFICIAL RECORDS, AND AS  
20 AMENDED BY THAT CERTAIN FIRST AMENDMENT TO DECLARATION  
21 OF CENTRAL PLANT EASEMENTS, DATED JANUARY 07, 2010 AND  
22 RECORDED JANUARY 07, 2010 IN BOOK 20100107 AS INSTRUMENT NO.  
23 0000577 OF OFFICIAL RECORDS; (B) PARKING AND ACCESS AGREEMENT,  
24 DATED APRIL 28, 2010 AND RECORDED MAY 03, 2010 IN BOOK 20100503 AS  
INSTRMENT NO. 0000515 OF OFFICIAL RECORDS; (C) DECLARATION OF  
SUPPORT AND ENCROACHMENT EASEMENTS, DATED DECEMBER 01,  
2009 AND RECORDED DECEMBER 01, 2009 IN BOOK 20091201 AS  
INSTRUMENT NO. 0002885 OF OFFICIAL RECORDS, AND AS AMENDED BY  
THAT CERTAIN FIRST AMENDMENT TO DECLARATION OF SUPPORT  
AND ENCROACHMENT EASEMENTS, DATED JANUARY 07, 2020 AND  
RECORDED JANUARY 07, 2010 IN BOOK 20100107 AS INSTRUMENT NO.  
0000578 OF OFFICIAL RECORDS; AND (D) DECLARATION OF LIFE SAFETY  
SYSTEMS EASEMENTS, DATED DECEMBER 01, 2009 AND RECORDED  
DECEMBER 01, 2009 IN BOOK 20091201 AS INSTRUMENT NO. 0002886 OF  
OFFICIAL RECORDS, AND AS AMENDED BY THAT CERTAIN FIRST  
AMENDMENT TO DECLARATION OF LIFE SAFETY SYSTEM EASEMENTS  
DATED JANUARY 07, 2010 AND RECORDED JANUARY 07, 2010 IN BOOK  
20100107 AS INSTRUMENT NO. 0000579 OF OFFICIAL RECORDS, AND ALL  
IMPROVEMENTS AND APPURTENANCES THEREON, APN: 162-20-714-020.

3. real property located at 3726 South Las Vegas Boulevard, Unit 1803,



1 Las Vegas, Nevada

2 MORE PARTICULARLY DESCRIBED AS:

3 PARCEL I:

4 UNIT ONE THOUSAND EIGHT HUNDRED THREE (1803) IN BUILDING  
5 "W" IN VEER TOWERS, AS SHOWN ON THAT CERTAIN FINAL MAP OF  
6 THE VEER TOWERS, A RESORT CONDOMINIUM SUBDIVISION ON FILE  
7 IN BOOK 142 OF PLATS, PAGE 42 (THE "MAP") AND AS SET FORTH IN  
8 THE DECLARATION OF COVENANTS, CONDITIONS, AND  
9 RESTRICTIONS AND RESERVATION OF EASEMENTS FOR VEER  
10 TOWERS (THE "DECLARATION") RECORDED MAY 03, 2010 IN BOOK  
11 20100503 AS INSTRUMENT NO. 0002036, BOTH IN THE OFFICE OF THE  
12 COUNTY RECORDER, CLARK COUNTY, NEVADA (THE "OFFICIAL  
13 RECORDS").

14 PARCEL II:

15 AN ALLOCATED INTEREST AS A TENANT-IN-COMMON IN THE  
16 COMMON ELEMENTS OF VEER TOWERS (INCLUDING ANY  
17 ANNEXATIONS THERETO), AS SHOWN BY THE MAP AND AS SET  
18 FORTH IN THE DECLARATION.

19 PARCEL III:

20 AN EXCLUSIVE EASEMENT APPURTENANT TO PARCELS ONE (1) AND  
21 TWO (2) DESCRIBED ABOVE, OVER AREAS DEFINED AND DESCRIBED  
22 AS LIMITED COMMON ELEMENTS, IF ANY, ALLOCATED TO PARCELS  
23 ONE (1) AND TWO (2) IN THE DECLARATION AND AS SHOWN AND  
24 DELINEATED UPON THE MAP REFERRED TO ABOVE.

PARCEL IV:

NON-EXCLUSIVE EASEMENTS FOR ACCESS, INGRESS, EGRESS, USE AND  
OTHER PURPOSES ALL DESCRIBED IN THE DECLARATION AND IN THAT  
CERTAIN (A) DECLARATION OF CENTRAL PLANT EASEMENTS, DATED  
DECEMBER 01, 2009 AND RECORDED DECEMBER 01, 2009 IN BOOK  
20091201 AS INSTRUMENT NO. 0002884 OF OFFICIAL RECORDS, AND AS  
AMENDED BY THAT CERTAIN FIRST AMENDMENT TO DECLARATION  
OF CENTRAL PLANT EASEMENTS, DATED JANUARY 07, 2010 AND  
RECORDED JANUARY 07, 2010 IN BOOK 20100107 AS INSTRUMENT NO.  
0000577 OF OFFICIAL RECORDS; (B) PARKING AND ACCESS AGREEMENT,  
DATED APRIL 28, 2010 AND RECORDED MAY 03, 2010 IN BOOK 20100503 AS  
INSTRUMENT NO. 0000515 OF OFFICIAL RECORDS; (C) DECLARATION OF  
SUPPORT AND ENCROACHMENT EASEMENTS, DATED DECEMBER 01,  
2009 AND RECORDED DECEMBER 01, 2009 IN BOOK 20091201 AS

1 INSTRUMENT NO. 0002885 OF OFFICIAL RECORDS, AND AS AMENDED BY  
2 THAT CERTAIN FIRST AMENDMENT TO DECLARATION OF SUPPORT  
AND ENCROACHMENT EASEMENTS, DATED JANUARY 07, 2010 AND  
3 RECORDED JANUARY 07, 2010 IN BOOK 20100107 AS INSTRUMENT NO.  
0000578 OF OFFICIAL RECORDS; AND (D) DECLARATION OF LIFE SAFETY  
4 SYSTEMS EASEMENTS, DATED DECEMBER 1, 2009 AND RECORDED  
DECEMBER 1, 2009 IN BOOK 20091201 AS INSTRUMENT NO. 0002886 OF  
5 OFFICIAL RECORDS, AND AS AMENDED BY THAT CERTAIN FIRST  
AMENDMENT TO DECLARATION OF LIFE SAFETY SYSTEM EASEMENTS  
6 DATED JANUARY 07, 2010 AND RECORDED JANUARY 7, 2010 IN BOOK  
20100107 AS INSTRUMENT NO. 0000579, AND ALL IMPROVEMENTS AND  
APPURTENANCES THEREON, APN: 162-20-714-153.

7 (all of which constitutes property).

8 3. If any property being subject to forfeiture pursuant to 18 U.S.C. §  
9 981(a)(1)(A) with 28 U.S.C. § 2461(c); 18 U.S.C. § 981(a)(1)(C) with 28 U.S.C. § 2461(c);  
10 and 18 U.S.C. § 982(a)(1), as a result of any act or omission of the defendant -

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

17 it is the intent of the United States of America, pursuant to 21 U.S.C. § 853(p), to seek  
18 forfeiture of any other property of the defendant for the property listed above.

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

1 All pursuant to 18 U.S.C. § 981(a)(1)(A) with 28 U.S.C. § 2461(c); 18 U.S.C. §  
2 981(a)(1)(C) with 28 U.S.C. § 2461(c); 18 U.S.C. § 982(a)(1); 18 U.S.C. § 1957; and 21  
3 U.S.C. § 853(p).

4  
5 DATED this 27<sup>th</sup> day of January, 2021.

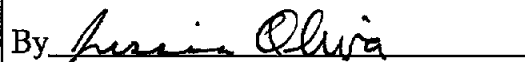
6 A TRUE BILL:

7  
8 /S/  
9 FOREPERSON OF THE GRAND JURY

10 DANIEL S. KAHN  
Acting Chief, Fraud Section

11   
12 JOSEPH MCFARLANE  
13 Trial Attorney

14 NICHOLAS A. TRUTANICH  
15 United States Attorney

16 By   
17 JESSICA OLIVA  
18 Assistant United States Attorney

19 Attorneys for Plaintiff  
UNITED STATES OF AMERICA