

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA :

- v. - :

SEALED SUPERSEDING  
INDICTMENT

IRINA DILKINSKA, :

S14 17 Cr. 630 (ER)

Defendant. :

- - - - - X

COUNT ONE  
(Conspiracy to Commit Wire Fraud)

The Grand Jury charges:

1. From in or about 2014 through in or about 2019, in the Southern District of New York and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular state or District, IRINA DILKINSKA, the defendant, who is expected to be first brought to and arrested in the Southern District of New York, and whose point of entry in the United States is expected to be the Southern District of New York, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Section 1343.

2. It was a part and an object of the conspiracy that IRINA DILKINSKA, the defendant, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and

property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit, DILKINSKA helped to operate an international fraud scheme involving the sale of a purported cryptocurrency known as "OneCoin" - by, among other things, managing the scheme's proceeds and evading law enforcement investigations into the scheme - as part of which false statements and misrepresentations were made to solicit individuals throughout the world, including in the Southern District of New York, to invest in OneCoin, thereby causing individuals to send interstate and international wires representing their OneCoin investments.

(Title 18, United States Code, Sections 1349 and 3238.)

**COUNT TWO**  
**(Conspiracy to Commit Money Laundering)**

The Grand Jury further charges:

3. From at least in or about 2014 through at least in or about 2019, in the Southern District of New York and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular state or District, IRINA DILKINSKA, the

defendant, who is expected to be first brought to and arrested in the Southern District of New York, and whose point of entry in the United States is expected to be the Southern District of New York, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit money laundering, in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 1956(a)(2)(B)(i).

4. It was a part and an object of the conspiracy that IRINA DILKINSKA, the defendant, and others known and unknown, knowing that the property involved in certain financial transactions represented the proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such financial transactions which in fact involved the proceeds of specified unlawful activity, to wit, proceeds of the wire-fraud scheme alleged in Count One of this Indictment, in violation Title 18, United States Code, Section 1343, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, all in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

5. It was further a part and an object of the conspiracy that IRINA DILKINSKA, the defendant, and others known and

unknown, would and did transport, transmit, and transfer, and attempt to transport, transmit, and transfer a monetary instrument and funds from a place in the United States to and through a place outside the United States, and to a place in the United States from and through a place outside the United States, knowing that the monetary instrument and funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, to wit, proceeds of the wire-fraud scheme alleged in Count One of this Indictment, in violation Title 18, United States Code, Section 1343, all in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i).

(Title 18, United States Code, Sections 1956(h) and 3238.)

**FORFEITURE ALLEGATIONS**

6. As a result of committing the offense alleged in Count One of this Indictment, IRINA DILKINSKA, the defendant, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the

commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense that the defendant personally obtained.

7. As a result of committing the offense alleged in Count Two of this Indictment, IRINA DILKINSKA, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in said offense, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offense.

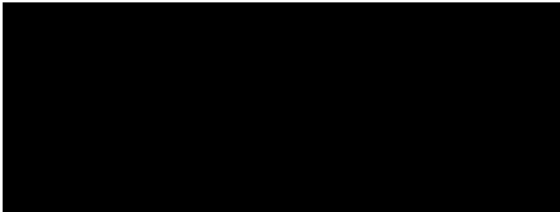
**Substitute Asset Provision**

8. If any of the above-described forfeitable property, 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 subdivided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981 and 982;  
Title 21, United States Code, Sections 853; and  
Title 28, United States Code, Section 2461.)



Audrey Strauss  
AUDREY STRAUSS  
Acting United States Attorney

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(Title 18, United States Code,  
Sections 1349, 1956(h), and 3238)

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A TRUE BILL

