

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
: :
v. : Crim. No. 25-
: :
EVANGELOS DROSOS : 18 U.S.C. § 1343
: 18 U.S.C. § 1344
: 26 U.S.C. § 7203
: 18 U.S.C. § 2

INFORMATION

The defendant having waived in open court prosecution by indictment, the United States charges:

COUNTS ONE AND TWO
(Wire Fraud)

1. At times relevant to this Information:

a. Defendant EVANGELOS DROSOS (“DROSOS”) was an accountant and tax preparer who resided in New Jersey and managed and operated various entities used to solicit investments from members of the public (the “Victim Investors”), including ADMS Management LLC (“ADMS”); Dinastia Corporation (“Dinastia”), which occasionally did business as WRD Consulting and Investment Group Inc. (“WRD”); Drosos Lorenzo & Associates P.C. (“Lorenzo & Associates”); and Leventes LLC (“Leventes”), among others (collectively, the “DROSOS Entities”). The DROSOS Entities were located in New Jersey.

b. DROSOS had ownership and control over multiple bank accounts held by ADMS, Dinastia, Lorenzo & Associates, and Leventes. The bank accounts were held at Bank-1, Bank-2, Bank-3, Bank-4, and Bank-5, each of which was a

financial institution as defined in Title 18, United States Code, Section 1956(c)(7), and Title 31, United States Code, Section 5312. Banks -1 through -5 were insured by the Federal Deposit Insurance Company (“FDIC”). These banks accounts will be referenced collectively throughout this Information as “the DROSOS Bank Accounts.”

c. Victims -1 through -30 were each residents of New York, New Jersey, or Georgia. These individuals will be referenced collectively throughout this Information as the “Victim Investors.”

d. Victim-31 was a resident of New Jersey.

e. Company-1 was a business owned by Victim-31 which was located in New Jersey.

f. Company 2 was a business that purchased Company-1.

2. From at least as early as 2013 to in or around June 2025, in the District of New Jersey and elsewhere, the defendant,

EVANGELOS DROSOS,

did knowingly and intentionally devise and intend to devise a scheme and artifice to defraud Victims -1 through -30 and others, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, as set forth more fully below.

Goal of the Scheme

3. The goal of the scheme was for DROSOS, individually and through the DROSOS Entities, to profit unlawfully by fraudulently soliciting and accepting funds

from the Victim Investors and to use those funds for personal expenditures and, in certain instances, to pay back prior Victim Investors in a Ponzi-like manner.

Manner and Means of the Scheme

4. It was part of the scheme that:

a. DROSOS induced the Victim Investors to send funds to DROSOS by falsely representing that he would invest the Victim Investors' funds when, in reality, DROSOS diverted those funds for his personal use.

Victim-1

b. In furtherance of the scheme, from in or around August 2013 through in or around August 2018, DROSOS induced Victim-1 to write multiple checks to WRD totaling approximately \$320,000 by falsely representing to Victim-1 that DROSOS would deposit and manage those funds in a retirement account that he would maintain for Victim-1's benefit. After Victim-1 sent Drosos those checks, Drosos deposited them into the Bank-3 Dinastia Account.

c. Despite his representations to Victim-1, DROSOS did not invest the funds that Victim-1 had deposited with WRD nor did DROSOS maintain them in an investment account. Instead, DROSOS co-mingled those funds with other DROSOS Entity bank accounts and used the funds to pay for business and personal expenses.

d. In furtherance of the scheme, DROSOS caused false "quarterly account performance statements" to be sent to Victim-1 to prevent Victim-1 from discovering that DROSOS was diverting Victim-1's money for his personal use. Those

“quarterly account performance statements” purported to show that the monies Victim-1 had deposited with the DROSOS-controlled entity were invested in bona fide investment funds and had an “annual percentage yield” of approximately 9%.

e. Victim-1 made numerous requests to DROSOS to return Victim-1’s money. For example, on or about April 22, 2024, Victim-1 sent a text message to DROSOS asking when Victim-1 could “expect to receive the annuity documents” needed to obtain a full return of funds. In response, DROSOS sent a text message to Victim-1 on or about April 23, 2024 stating that “[t]he documents and the statement will go out tomorrow.”

f. Ultimately, DROSOS did not return to Victim-1 any of the funds that Victim-1 deposited with DROSOS as a result of DROSOS’s fraudulent representations.

Victims -2 through -30

g. In furtherance of the scheme, DROSOS induced Victims -2 through -30 to invest in one or more of the DROSOS Entities under the promise of rates of return varying anywhere from approximately 9% to 20% annually.

h. DROSOS further represented to these Victim Investors that the funds they invested in the DROSOS Entities would be used to finance Merchant Cash Advances (“MCAs”). MCAs are investment vehicles in which an investor provides an upfront lump sum to a business in exchange for an agreed-upon portion of its future credit or debit card sales.

i. To memorialize this arrangement, DROSOS often, but not always, prepared a “Syndication Agreement” for a Victim Investor, which purported to represent a “promise of payment” that a DROSOS entity made to the Victim Investor.

j. Despite his representations, DROSOS did not invest funds provided by the Victim Investors into MCAs. Instead, DROSOS used the Victim Investors’ funds to: (a) finance his own lifestyle and make various personal expenditures, including vacations, payments on a luxury vehicle, and real estate; (b) pay back prior Victim Investors in the manner of a Ponzi scheme; and (c) make various other expenditures unrelated to the investments made by the Victim Investors.

k. After receiving funds from the Victim Investors, DROSOS frequently moved the funds through one or more of the DROSOS Bank Accounts to disguise and conceal the nature, source, and ownership of the funds.

l. DROSOS took various additional steps to hide the fraudulent scheme from the Victim Investors and to maintain their trust, including by: (a) providing Victim Investors false account statements related to their investments; (b) making occasional payments to certain Victim Investors derived from other Victim Investors’ investments that DROSOS falsely indicated reflected a return on their investment in MCAs in the manner of a Ponzi scheme; and (c) providing Victim Investors false explanations for delayed and/or incomplete payments and/or redemptions.

m. In this manner, through false representations, DROSOS caused the Victim Investors to send him more than approximately \$10 million, resulting in aggregate losses of more than approximately \$3 million to the Victim Investors.

5. On or about the dates listed below, in the District of New Jersey and elsewhere, for the purpose of executing and attempting to execute the scheme and artifice to defraud described above, the defendant,

EVANGELOS DROSOS,

did knowingly and intentionally transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce certain writings, signs, signals, pictures, and sounds, each such wire transmission constituting a separate count of this Information:

Count	Date	Description
1	April 23, 2024	Interstate text message from DROSOS to Victim-1
2	May 10, 2024	Interstate wire transfer of \$150,000 from Victim-2's bank account to the Bank-2 Dinastia Account

In violation of Title 18, United States Code, Section 1343 and Section 2.

COUNT THREE
(Wire Fraud)

1. The allegations in paragraph 1 of Counts One and Two are re-alleged here.

2. In or around early 2021, Victim-31 sought accounting assistance from DROSOS in connection with a New Jersey state tax audit. At or around the same time, Victim-31 was seeking to sell Company-1 to Company-2.

3. DROSOS induced Victim-31 to instruct Company-2 to deposit approximately \$2.7 million into an account DROSOS controlled in partial satisfaction of its purchase of Company-1 by falsely representing to Victim-31 that DROSOS would maintain \$761,000 of those funds in escrow while DROSOS was assisting Victim-31 with the New Jersey sales tax audit.

4. In or around May 2021, Company-2 wired approximately \$2.7 million to an account at Bank-5, as directed by DROSOS.

5. Despite his representations to Victim-31, DROSOS did not maintain the approximately \$761,000 in escrow. Instead, DROSOS co-mingled the money with other business and personal funds and used the money for personal and unrelated business expenses.

6. On or about May 3, 2021, in the District of New Jersey and elsewhere, for the purpose of executing and attempting to execute the scheme and artifice to defraud described above, the defendant,

EVANGELOS DROSOS,

did knowingly and intentionally transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce certain writings, signs, signals, pictures, and sounds, namely, an interstate wire of approximately \$2.7 million from a bank account controlled by Company-2 to an account at Bank-5 controlled by DROSOS.

In violation of Title 18, United States Code, Section 1343 and Section 2.

COUNT FOUR
(Bank Fraud)

1. The allegations in paragraph 1 of Counts One and Two of this Information are re-alleged here.

2. Beginning on approximately June 28, 2024 and continuing through approximately July 23, 2024, DROSOS prepared twelve self-issued checks from accounts under his control at several financial institutions, including accounts at Bank-1 and Bank-4, and then deposited those checks into multiple bank accounts at Bank-2.

3. DROSOS deposited these checks at Bank-2 while knowing that the issuing accounts did not have funds to cover the amounts listed on the checks.

4. Nonetheless, in the manner of a check-kiting scheme, DROSOS rapidly withdrew and transferred non-existent funds from the accounts at Bank-2, leveraging provisional credit on the Bank-2 accounts. That is, DROSOS deposited the checks into Bank-2 accounts to create an artificial balance and proceeded to withdraw those funds prior to the checks bouncing due to insufficient funds in the source accounts.

5. In this manner, DROSOS fraudulently obtained approximately \$496,788.88 from Bank-2.

6. On or about June 28, 2024, in the District of New Jersey and elsewhere, the defendant,

EVANGELOS DROSOS,

knowingly executed and attempted to execute a scheme and artifice to defraud a financial institution, Bank-2, whose deposits were insured by the Federal Deposit

Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of Bank-2, by means of materially false and fraudulent pretenses, representations, and promises.

In violation of Title 18, United States Code, Section 1344(1) and (2) and Section 2.

COUNT FIVE
(Failure to File Individual Tax Return)

1. The allegations in paragraph 1 of Counts One and Two of this Information are re-alleged here.

2. During calendar year 2023, DROSOS had and received gross income exceeding \$30,000. By reason of such gross income, he was required by law, following the close of calendar year 2023 and on or before April 15, 2024, to make an income tax return to the United States Department of Treasury, Internal Revenue Service (“IRS”), stating specifically the items of his gross income and any deductions and credits to which he was entitled.

3. On or about April 15, 2024, the defendant,

EVANGELOS DROSOS,

knowing and believing the facts described in paragraph 2 above, did knowingly and willfully fail to make an income tax return to the IRS,

In violation of Title 26, United States Code, Section 7203 and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION AS TO COUNTS ONE THROUGH FOUR

Upon conviction of one or more of the offenses alleged in Counts One, Two, Three, and Four of this Information, DROSOS 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), all property, real and personal, that constitutes or is derived, directly and indirectly, from gross proceeds traceable to the commission of the offenses, which in the aggregate, was approximately \$5,383,732.55.

Substitute Assets Provision

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 person;
- (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), as incorporated by 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-described forfeitable property.

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APPROVED:



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