

FILED

OCT 18 2022

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

AT 8:30 2:44 P.M
WILLIAM T. WALSH
CLERK *SPC*

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Criminal No. 22-
	:	
ANNA KLINE	:	18 U.S.C. § 1343
a/k/a "Jordana Weber"	:	18 U.S.C. § 1956(a)(1)(B)(i)
a/k/a "Ana Bourne"	:	18 U.S.C. § 1957(a)
a/k/a "Ana Torres"	:	18 U.S.C. § 1519

INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark, charges:

COUNTS ONE AND TWO
(Wire Fraud)

Introduction

1. From in or around 2017 through in or around July 2019, defendant Anna KLINE a/k/a Jordana Weber a/k/a Ana Bourne a/k/a Ana Torres ("KLINE") conducted a fraudulent advance fee loan scheme, through which KLINE used various shell companies to fraudulently offer lending services to individuals and businesses. Through these shell companies, KLINE required borrowers to pay up to 5% of a potential loan amount as an up-front fee before any loan was funded. In reality, as KLINE well-knew, the shell companies never had the capacity to extend loans, and KLINE simply used the fees paid by potential borrowers for lavish purchases, which included high-priced artwork, luxury vehicles, and personal vacations.

Background

2. At various times relevant to this Indictment:
 - a. KLINE was a resident of California, Wisconsin, and Nevada;
 - b. KLINE controlled the following companies (collectively, the “Subject Companies”):
 - i. Reinhart Holdings, LLC (“Reinhart”), registered in the state of Montana on or about June 8, 2017;
 - ii. Mindful Investments, LLC (“Mindful”), registered in the state of Wyoming on or about March 28, 2018;
 - iii. Global Alliance Ventures, LLC (“GAV”), registered in the state of Wyoming on or about April 11, 2018.
 - iv. Triptych Holdings, LLC (“Triptych”), registered in the state of Wyoming on or about July 23, 2018.
 - c. The Subject Companies were “shell” companies, lacking any actual economic function or business operation, and were established to further Kline’s fraudulent advance fee loan scheme.
 - d. KLINE controlled the following bank accounts: (a) bank accounts ending in 5101, 5440, and 5457 under the name “Reinhart Holdings LLC” at Bank-A; (b) bank accounts ending in 6856 and 8746 under the name Jordana Weber at Bank-A; (c) a bank account ending in 0054 under the name “Mindful Investments LLC” at Bank-B; and (d) bank accounts ending in 0996, 1005, and 6462 under the name “Reinhart Holdings LLC” at Bank-B (the “KLINE Bank Accounts”).
 - e. Jason Torres (“Torres”) resided with KLINE in California from in or around 2018 through in or around July 2019 and maintained a bank

account ending in 5301 under the name “Keystone Montana Group LLC,” at Bank-A (the “KMG Bank-A Account”).

f. KLINE used the Subject Companies to fraudulently offer lending services to individuals and companies in the United States and Canada (collectively, the “Victim Borrowers”), including:

- i. “Victim Borrower-1,” a medicinal cannabis research and cultivating company headquartered in Ontario, Canada;
- ii. “Victim Borrower-2,” a window and door distribution company headquartered in Ontario, Canada;
- iii. “Victim Borrower-3,” a construction projects company headquartered in Brookfield, Connecticut;
- iv. “Victim Borrower-4,” a construction equipment supply and manufacturing company with a location in Texas; and
- v. “Victim Borrower-5,” a bottling and manufacturing company headquartered in Charlotte, North Carolina.

g. Individual-1 resided in Connecticut and was the owner of Victim Borrower-3.

h. Individual-2 resided in Colorado and was a business partner of Individual-1.

i. GAV employed individuals who resided in New Jersey and who performed work for GAV while in New Jersey.

j. Dealership-1 was an auto dealership located in Denver, Colorado.

k. Dealership-2 was a furniture dealership with a location in Commerce, California.

l. Dealership-3 was an auto dealership with locations in San Francisco and Oakland, California.

m. Dealership-4 was an art dealership located in Miami Beach, Florida.

n. Bank-A and Bank-B were financial institutions as defined in Title 18, United States Code, Section 1956(c)(7), and Title 31, United States Code, Section 5312.

The Scheme

3. From in or around April 2017 through in or around July 2019, in the County of Essex, in the District of New Jersey, and elsewhere, the defendant,

ANNA KLINE
a/k/a "Jordana Weber"
a/k/a "Ana Bourne"
a/k/a "Ana Torres"

did knowingly and intentionally devise and intend to devise a scheme and artifice to defraud and to obtain money and property from the Victim Borrowers by means of materially false and fraudulent pretenses, representations, and promises, as set forth more fully below.

Goal of the Scheme

4. The goal of the scheme was for KLINE, individually and as the controlling person of the Subject Companies, to profit unlawfully by fraudulently soliciting and accepting money from the Victim Borrowers through a fraudulent advance fee loan scheme.

Manner and Means of the Scheme

5. It was part of the scheme that:

a. KLINE, through the Subject Companies, falsely represented, or caused to be represented, to the Victim Borrowers, that the Subject Companies were legitimate private lending companies with access to large amounts of capital through the Subject Companies' relationships with fictitious wealthy investors (the "Fictitious Investors"), who did not actually exist.

b. KLINE, through the Subject Companies, required upfront, prepaid interest fees (the "PPI Fees") of up to 5% of the proposed loan amount from prospective Victim Borrowers as a precondition for funding the loans. In reality, the Subject Companies were a sham and did not have access to the capital necessary to fund the proposed loans and no such loans were funded.

c. To convince the Victim Borrowers that the Subject Companies were legitimate and had access to capital, KLINE hired individuals to conduct telephone calls with the Victim Borrowers or their representatives and to pose falsely either as: (i) the Fictitious Investors, or (ii) bank representatives, who told the Victim Borrowers that the Fictitious Investors had adequate funds at particular banks to fund the proposed loans.

d. KLINE, and others at KLINE'S direction, emailed the Victim Borrowers fake bank statements purporting to show that the Fictitious Investors held accounts at banks with balances in excess of \$100 million.

e. KLINE, and others at KLINE'S direction, presented the Victim Borrowers with fraudulent loan documents referred to as "broker

agreements” and “term sheets” that included the terms of, and fees associated with the proposed loan. The fraudulent loan documents stated that, if the Victim Borrower’s loan was not funded within a certain period, typically 30 days, the PPI Fee would be fully refunded within 24 to 48 hours.

f. KLINE, and others at KLINE’S direction, induced the Victim Borrowers to transfer the PPI Fees through interstate wires to one or more of the KLINE Bank Accounts.

g. After the Victim Borrowers were induced into wiring the PPI Fees, KLINE and Torres used the funds to pay for various personal expenditures, including luxury vehicles, vacations, and high-priced artwork. KLINE further used the funds to reimburse previous Victim Borrowers in the manner of a traditional Ponzi scheme.

h. KLINE, and others at KLINE’S direction, provided the Victim Borrowers with bogus explanations for why the funding of the Victim Borrowers’ loans was delayed, including that: (i) the Subject Companies were continuing to conduct due diligence on the loan; and (ii) one of the Fictitious Investors was out of the country.

i. Through this scheme, KLINE obtained funds from at least five Victim Borrowers totaling approximately \$7 million.

8. From at least as early as 2017 to in or around August 2019, in the District of New Jersey and elsewhere, for the purpose of executing and attempting to execute this scheme and artifice to defraud, the defendant,

ANNA KLINE
a/k/a "Jordana Weber"
a/k/a "Ana Bourne"
a/k/a "Ana Torres"

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, as set forth more fully below, each such wire transmission constituting a separate count of this Indictment:

Count	Date	Description
1	7/3/2018	Interstate wire transfer of \$250,000 from Individual-2 to the 6462 Reinhart Holdings Bank-B Account
2	7/20/2018	Interstate wire transfer of \$537,500 from Individual-2 to the 6462 Reinhart Holdings Bank-B Account

All in violation of Title 18, United States Code, Section 1343.

COUNTS THREE THROUGH THIRTEEN

(Money Laundering)

1. The allegations in paragraphs 1 and 2 and 4 and 5 of Counts One and Two of this Indictment are re-alleged here.

2. On or about the dates set forth below, in the District of New Jersey and elsewhere, defendant

ANNA KLINE
a/k/a "Jordana Weber"
a/k/a "Ana Bourne"
a/k/a "Ana Torres"

did knowingly conduct and attempt to conduct the following financial transactions affecting interstate commerce, which involved the proceeds of specified unlawful activity, that is, wire fraud, 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 the specified unlawful activity and that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, as set forth more fully below, each such transaction constituting a separate count of this Indictment:

Count	Date	Description
3	4/3/2018	Interstate wire transfer of \$625,100 from the 0054 Mindful Investments Bank-B Account to the KMG Bank-A Account
4	7/13/2018	Interstate wire transfer of \$40,755 from the 0054 Mindful Investments Bank-B Account to the 6856 Jordana Weber Bank-A Account
5	7/13/2018	Interstate wire transfer of \$100,000 from the 0054 Mindful Investments Bank-B Account to the KMG Bank-A Account

6	7/20/2018	Online banking transfer of \$250,000 from the 0054 Mindful Investments Bank-B Account to the 6462 Reinhart Holdings Bank-B Account
7	12/4/2018	Online banking transfer of \$1,050,000 from the 0996 Reinhart Holdings Bank-B Account to the 6462 Reinhart Holdings Bank-B
8	12/4/2018	Online banking transfer of \$737,500 from the 0996 Reinhart Holdings Bank-B Account to the 0054 Mindful Investments Bank-B Account
9	12/4/2018	Interstate wire transfer of \$99,600 from the 6462 Reinhart Holdings Bank-B Account to the 8746 Jordana Weber Bank-A Account
10	12/4/2018	Interstate wire transfer of \$350,050 from the 6462 Reinhart Holdings Bank-B Account to the KMG Bank-A Account
11	3/5/2019	Online banking transfer of \$765,000 from the 1005 Reinhart Holdings Bank-B Account to the 0996 Reinhart Holdings Bank-B Account
12	3/5/2019	Online banking transfer of \$500,000 from the 1005 Reinhart Holdings Bank-B Account to the 0054 Mindful Investments Bank-B Account
13	3/5/2019	Interstate wire transfer of \$150,000 from the 0054 Mindful Investments Bank-B Account to the 8746 Jordana Weber Bank-A Account

All in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNTS FOURTEEN THROUGH SEVENTEEN
(Engaging in Monetary Transactions in Property
Derived from Specified Unlawful Activity)

1. The allegations set forth in paragraphs 1 and 2 and 4 and 5 of Counts One and Two of this Indictment are re-alleged here.
2. On or about the dates set forth below, in the District of New Jersey and elsewhere, defendant

ANNA KLINE
a/k/a "Jordana Weber"
a/k/a "Ana Bourne"
a/k/a "Ana Torres"

did knowingly engage and attempt to engage in the monetary transactions set forth below, by, through, and to a financial institution, in and affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, derived from a specified unlawful activity, that is, wire fraud, each such transaction constituting a separate count of this Indictment:

Count	Date	Description
14	8/13/2018	Interstate wire transfer of \$50,000 from the 0054 Mindful Investments Bank-B Account to Dealership-1 for the purchase of a 2018 Ford F-150 Raptor
15	12/4/2018	Interstate wire transfer of \$41,003.24 from the 6462 Reinhart Holdings Bank-B Account to Dealership-2 for the purchase of furniture
16	3/5/2019	Interstate wire transfer of \$245,269.00 from the 0996 Reinhart Holdings Bank-B Account to Dealership-3 for the purchase of a 2019 Lamborghini Urus
17	3/5/2019	Interstate wire transfer of \$35,000 from the 0054 Mindful Investments Bank-B Account to Dealership-4 for the purchase of artwork

All in violation of Title 18, United States Code, Section 1957(a).

COUNTS EIGHTEEN AND NINETEEN

(Falsification of Records in a Federal Investigation)

1. The allegations in paragraphs 1 and 2 and 4 and 5 of Counts One and Two of this Indictment are re-alleged here.

2. At various times relevant to Counts Eighteen and Nineteen of this Indictment:

a. Attorney-1 was a licensed attorney retained to represent KLINE in connection with criminal charges filed in the District of New Jersey relating to KLINE's participation in the advance fee loan scheme alleged in Counts One and Two of this Indictment.

b. Cellebrite was a digital forensics company that provided tools for the collection, analysis, and management of digital data, including data retrieved from cellular phones. Cellebrite tools could be used to extract data from digital devices, including cellular phones, and generate a report of the extraction, known as a Cellebrite report.

3. Between in or around April 2020 and in or around November 2021, in the District of New Jersey and elsewhere, the defendant,

ANNA KLINE
a/k/a "Jordana Webcr"
a/k/a "Ana Bourne"
a/k/a "Ana Torres"

did knowingly and intentionally alter, conceal, cover up, falsify, and make false entry in records and documents, described in the table below, with the intent to impede, obstruct, or influence the investigation or proper administration of a matter within the jurisdiction of a department or agency of the United States,

namely, the United States Attorney's Office for the District of New Jersey and the Federal Bureau of Investigation, each instance constituting a separate count of this Indictment:

Count	Approximate Date(s)	Description
18	January 23, 2021	KLINE provided the Government with a fraudulent Celebrite Report through Attorney-1
19	November 3, 2021	KLINE provided the Government with a Dell Inspiron laptop computer containing falsified data through Attorney-1

In violation of Title 18, United States Code, Section 1519.

FORFEITURE ALLEGATION AS TO COUNTS ONE AND TWO

1. As the result of committing the offenses constituting specified unlawful activity as defined in 18 U.S.C. § 1956(c)(7), as alleged in Counts One and Two of this Indictment, defendant

ANNA KLINE
a/k/a "Jordana Weber"
a/k/a "Ana Bourne"
a/k/a "Ana Torres"

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 from proceeds traceable to the commission of the offenses charged in Counts One and Two, and all property traceable thereto, which includes, but is not limited to, all right, title, and interest of the defendant in the following:

- A. Approximately \$20,181.81 in United States Currency, formerly held in Bank of the West Account #057-066474, seized on or about July 31, 2019;
- B. Approximately \$8,776.02 in United States Currency, formerly held in Bank of the West Account #057-066482, seized on or about July 31, 2019;
- C. Approximately \$35,000 in United States Currency seized on or about August 2, 2019 from British Motor Car Distributors representing a down payment for a 2019 Lamborghini LP700 Aventa, VIN# ZHWUM 6ZD7K LA08607;
- D. 2018 Mercedes Benz AMG E63S, VIN# WDDZH 8KB5J A391922, seized on or about July 31, 2019;
- E. 2018 Ducati Hypermotard 939, VIN# ZDM1Y BJS6J B013600, seized on or about July 31, 2019;

- F. 2017 Ducati 1299-Panigale Superleggera, VIN# ZDMHA AJW2H B000028, seized on or about July 31, 2019;
- G. 2018 Sea-Doo RXT-X300, VIN# CA-YDV09776B818, seized on or about July 31, 2019;
- H. 2018 Sea-Doo RXT-X300, VIN# CA-YDV12029C818, seized on or about July 31, 2019;
- I. 2019 Lamborghini Urus, VIN# ZPBUA 1ZL3K LA01980, seized on or about August 2, 2019;
- J. 2018 Mercedes Benz GLS 63W4, VIN# 4JGDF 7FE0J B081384, seized on or about August 2, 2019;
- K. 2018 Tesla Model X, VIN# 5YJXC BE47J F142958, seized on or about July 31, 2019;
- L. 2017 Can-Am Maverick, VIN# 3JBVN AW29H K000849, seized on or about July 31, 2019;
- M. 2018 Ford F-150 Raptor, VIN# 1FTFW 1RG9J FB64179, seized on or about July 31, 2019;
- N. 2018 GMC Yukon XL, VIN# 1GKS2 HKJ3J R275578, seized on or about July 31, 2019;
- O. 2018 BMW HP4 Race, VIN# WB10E 3305J ZG32617, seized on or about July 31, 2019;
- P. Artwork titled "Love Circle Love," seized on or about July 31, 2019 from 721 Modesto Avenue, South Lake Tahoe, California 96150;
- Q. Artwork titled "Speed of Love," seized on or about July 31, 2019 from Spring Mountain Motorsports Ranch, 3601 NV-160, Pahrump, NV 89048;
- R. Artwork titled "Race Car," seized on or about July 31, 2019 from Spring Mountain Motorsports Ranch, 3601 NV-160, Pahrump, NV 89048;

- S. Artwork titled "Happy Memories Blue," seized on or about July 31, 2019 from Spring Mountain Motorsports Ranch, 3601 NV-160, Pahrump, NV 89048.

(the "Specific Property").

FORFEITURE ALLEGATION AS TO COUNTS THREE THROUGH SEVENTEEN

2. As a result of committing the money laundering offenses charged in Counts Three through Seventeen of this Indictment, defendant

ANA KLINE
a/k/a "Jordana Weber"
a/k/a "Ana Bourne"
a/k/a "Ana Torres"

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), all property, real or personal, involved in such money laundering offenses, and all property traceable to such property, including the Specific Property.

Substitute Assets Provision
(Applicable to All Forfeiture Allegations)


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

- (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 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.

A True Bill


Foreperson

Philip R. Sellinger

PHILIP R. SELLINGER
United States Attorney

CASE NUMBER: 22-

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

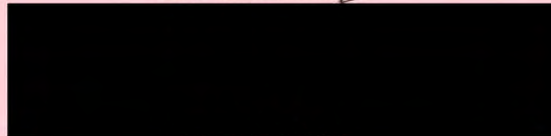
v.

ANNA KLINE
a/k/a "JORDANA WEBER"
a/k/a "ANA BOURNE"
a/k/a "ANA TORRES"

INDICTMENT FOR

18 U.S.C. § 1343
18 U.S.C. § 1956
18 U.S.C. § 1957
18 U.S.C. § 1519

A True Bill,



Foreperson

PHILIP R. SELLINGER
UNITED STATES ATTORNEY
NEWARK, NEW JERSEY

ANTHONY P. TORNTORE
ASSISTANT U.S. ATTORNEY
973-645-2726
