AUSA: Nicholas D. Pavlis

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

26 MAG 1082

UNITED STATES OF AMERICA v. RENATA SUPINA-SALTUS, Defendant.	[redacted] **COMPLAINT** Violations of 18 U.S.C. §§ 1343, 1957, and 2 COUNTY OF OFFENSE: NEW YORK

SOUTHERN DISTRICT OF NEW YORK, ss.:

CHAD LINDSLY, being duly sworn, deposes and says that he is a Special Agent with Homeland Security Investigations ("HSI"), and charges as follows:

COUNT ONE
(Wire Fraud)

1. From at least in or about July 2017 through at least in or about November 2023, in the Southern District of New York and elsewhere, RENATA SUPINA-SALTUS, the defendant, 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, transmitted and caused 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, SUPINA-SALTUS used, among other things, false and fictitious invoices to embezzle at least approximately $750,000 from her then-employer, the Permanent Mission of the Republic of Croatia to the United Nations, and used such proceeds to purchase personal items and services, and sent and received, and caused others to send and receive, emails and other electronic communications, to and from the Southern District of New York and elsewhere, in furtherance of that scheme.

(Title 18, United States Code, Sections 1343 and 2.)

COUNT TWO
(Engaging in a Monetary Transaction in Property Derived from Specified Unlawful Activity)

2. On or about August 2, 2021, in the Southern District of New York and elsewhere, RENATA SUPINA-SALTUS, the defendant, within the United States, knowingly engaged and attempted to engage in a monetary transaction, as defined in Title 18, United States Code, Section 1957(f)(1), in criminally derived property of a value greater than $10,000 that was derived from specified unlawful activity, to wit, SUPINA-SALTUS wired a payment of $15,694.17 to an

educational institution based in Arizona that consisted of proceeds from the wire fraud scheme charged in Count One of this Complaint.

(Title 18, United States Code, Sections 1957 and 2.)

COUNT THREE
(Engaging in a Monetary Transaction in Property Derived from Specified Unlawful Activity)

3. On or about December 30, 2021, in the Southern District of New York and elsewhere, RENATA SUPINA-SALTUS, the defendant, within the United States, knowingly engaged and attempted to engage in a monetary transaction, as defined in Title 18, United States Code, Section 1957(f)(1), in criminally derived property of a value greater than $10,000 that was derived from specified unlawful activity, to wit, SUPINA-SALTUS wired a payment of $10,488.60 to an educational institution based in Arizona that consisted of proceeds from the wire fraud scheme charged in Count One of this Complaint.

(Title 18, United States Code, Sections 1957 and 2.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

4. I am a Special Agent with HSI and I have been personally involved in the investigation of this matter. I base this affidavit on that experience, on my examination of various reports and records, and on my conversations with others. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

Overview

5. I have investigated a fraudulent scheme perpetrated on the Permanent Mission of the Republic of Croatia to the United Nations (the "PMRC"), located in Manhattan, New York, by RENATA SUPINA-SALTUS, the defendant, who formerly worked at the PMRC. As explained further below, the investigation has revealed that SUPINA-SALTUS embezzled at least approximately $750,000 from the PMRC through her former role and access to financial accounts at the PMRC. As part of that scheme, SUPINA-SALTUS fabricated numerous invoices from both legitimate and fictitious vendors for purported goods and services to the PMRC (the "Fraudulent Invoices"), which SUPINA-SALTUS then processed through her unique access to PMRC invoicing and billing records. In doing so, SUPINA-SALTUS used her access to pay the Fraudulent Invoices by remitting hundreds of thousands of dollars from a PMRC financial account to her personal bank accounts, where she used the fraudulently-obtained funds to finance her personal life.

SUPINA-SALTUS's Work at the PMRC

6. Based on my review of reports and records provided by the PMRC and others, my analysis of financial records, and my conversations with other law enforcement officers and representatives from the PMRC, I have learned the following, in substance and in part:

a. RENATA SUPINA-SALTUS, the defendant, was employed at the PMRC at first as a contractor in or around the mid-1990s, and later became a full-time employee at the PMRC. Beginning in or about 2013, SUPINA-SALTUS's job responsibilities started to include management of the PMRC's finances and accounting, which continued up until her termination in approximately November 2023. For example, starting at least in or about July 2017 through in or about November 2023, SUPINA-SALTUS was solely responsible for processing invoices and arranging payments for certain work expenses incurred by the PMRC. As part of this role, SUPINA-SALTUS had unique and near-exclusive access to certain user credentials and tokens for the PMRC's various accounts, such as for utilities, healthcare insurance, credit cards, and banking.

b. During that same period, the PMRC paid SUPINA-SALTUS monthly, which included a salary of approximately $3,700 and about $450 for commuting expenses. These payments were primarily approved by the PMRC's ambassador, but transmitted via ACH[1] by SUPINA-SALTUS herself into personal accounts held at a financial institution ("Financial Institution-1"), with account numbers ending in 1552 and 6351 (the "1552 Account" and the "6351 Account," and together, the "SUPINA-SALTUS Accounts").[2]

c. As part of her employment, SUPINA-SALTUS had full access and signatory authority to the PMRC's business account at a different financial institution ("Financial Institution-2"), an account ending in 0664 (the "PMRC Account"). The PMRC Account was opened on or about February 1, 2011, and domiciled in Washington, D.C. SUPINA-SALTUS was a signatory on the PMRC Account between at least in or about July 2017 through her termination from the PMRC in or about November 2023.

d. During the period of her employment at the PMRC, SUPINA-SALTUS became responsible at the PMRC for processing invoices and paying for work expenses incurred by the PMRC, including, for example, healthcare insurance and utilities. These payments were typically sourced by funds in the PMRC Account, and made in various ways, including by check, ACH transfer, cash, and online bill payment, among others. Many of these payment activities for the PMRC were initiated by SUPINA-SALTUS, subject to approval by the PMRC's ambassador, and ultimately paid by SUPINA-SALTUS using the PMRC Account. In this way, SUPINA-SALTUS was exposed to, and directly involved in, the entire invoice payment process.

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[1] Based on my training and experience, I know that ACH transactions are electronic money transfers between banks or credit unions across a network called the Automated Clearing House.

[2] Based on my review of records from Financial Institution-1, I understand that the 6351 Account was originally opened by SUPINA-SALTUS on or about August 6, 2007—using a Connecticut address—at a separate bank, which was later acquired by Financial Institution-1. The account was jointly opened with an individual that, based on my review of open-source records, appears to be SUPINA-SALTUS's husband.

e. In or about June 2023, the PMRC began implementing a new accounting software system called KONTO to replace the preexisting system. Shortly thereafter, in or about September 2023, the PMRC employed a Senior Specialist Clerk ("SCC") to handle this transition and to assume the duties of accounting in KONTO, which included the implementation of KONTO, entering and recording all accounting transactions in arrears, and facilitating the handover of invoice processing duties from SUPINA-SALTUS, among others.

f. This transition triggered oversight and a more in-depth review of SUPINA-SALTUS's financial work at the PMRC. In connection with the transition to KONTO, the SCC reviewed various of the PMRC's accounts and user interfaces, such as the PMRC's chosen healthcare insurance web application. The SCC opted to review the healthcare insurance web application first because it was the largest monthly expense paid by the PMRC. The SCC subsequently identified several discrepancies in the healthcare insurance payments, which included what appeared to be apparent double payments.

g. Specifically, as of in or about September 2023, there were two healthcare insurance invoices—dated from in or about July and August 2023—marked as paid in KONTO that were still showing as outstanding on the healthcare insurance provider's system. Upon further review, the SCC determined that the payments showing in KONTO were paid using an ACH payable to one of the SUPINA-SALTUS Accounts and not to any healthcare insurance provider. SUPINA-SALTUS nevertheless labeled the payments as "PAID" in the PMRC's system, though, in reality, the healthcare insurance provider had not been paid. The SCC noted that the purported payments for healthcare insurance were in fact paid into the 1552 Account—*i.e.*, one of the personal accounts in which SUPINA-SALTUS received her regular monthly salary from the PMRC. These initial findings, among others, led to a broader review and subsequent analysis of the PMRC's accounting history.

The Invoicing Scheme

h. A subsequent audit of the PMRC's Account by representatives from the PMRC revealed more than approximately $750,000 in unauthorized transactions remitted via ACH from the PMRC Account to one or the other of the SUPINA-SALTUS Accounts. Based on my review of reports and records from the PMRC, my discussions with representatives from the PMRC, and my financial review and analysis of the SUPINA-SALTUS Accounts and the PMRC Account, SUPINA-SALTUS successfully committed this embezzlement and concealed the fraudulent transactions from the PMRC by at least two different means, both of which involved fraudulent invoicing:[3]

[3] Based on my review of a sample of these invoices, I believe that SUPINA-SALTUS, the defendant, created and submitted these fraudulent invoices due to her central accounting role and access at the PRMC during the period in which they were submitted, *see* ¶ 6(a) *supra*, and because many of the invoices include handwritten initials that resemble the letters "R.S.," which I believe are shorthand for "Renata Supina."

SUPINA-SALTUS's Double Payment of Legitimate Invoices

i. SUPINA-SALTUS made double payments for certain invoices, which typically involved an authorized payment to the vendor for the PMRC and then a second ACH payment of the same amount to one of the SUPINA-SALTUS Accounts. For example, on or about July 29, 2021, SUPINA-SALTUS transferred approximately $15,314.82 into the 1552 Account, while also transmitting that same amount to the billed healthcare insurance provider for the PMRC. Based on my review of credit card statements, SUPINA-SALTUS also automatically billed for certain regular PMRC payments (*e.g.*, telephone and internet bills) through a credit card account owned by the PMRC, which is described further in Paragraph 6(h)(iii) below, and then would issue a second ACH payment for the same invoice amount to one of the SUPINA-SALTUS Accounts.

SUPINA-SALTUS's Creation of Fabricated Invoices

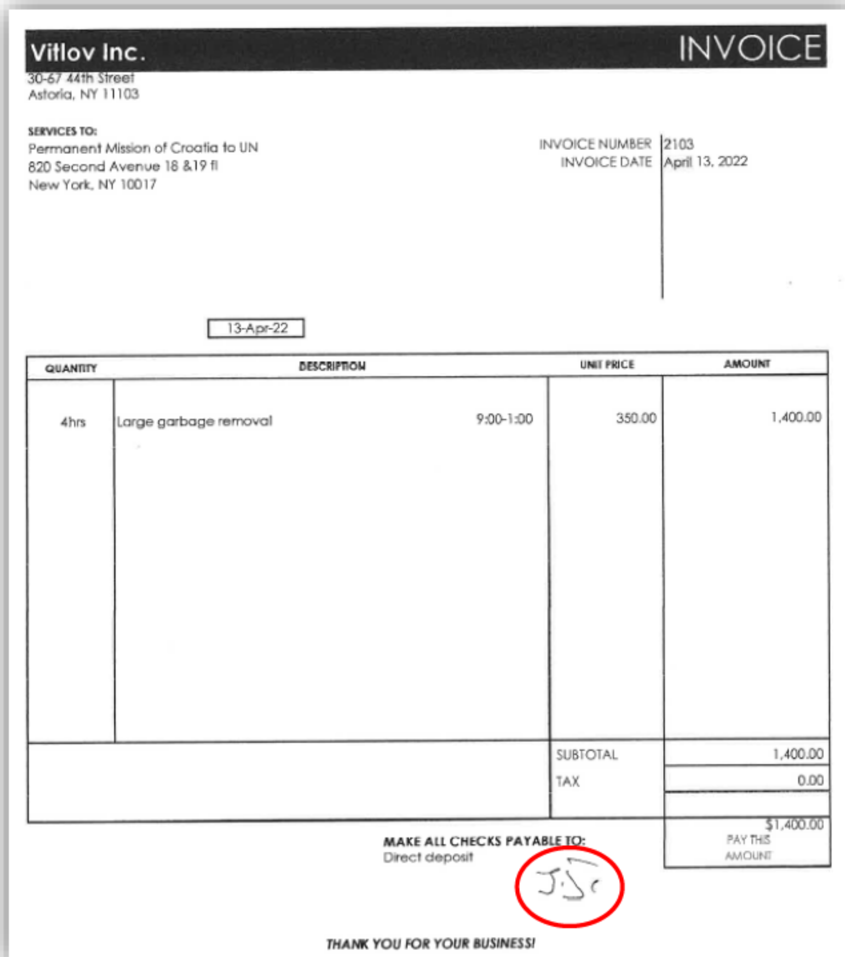
ii. Other times, SUPINA-SALTUS fabricated invoices and billed to the PMRC, but subsequently made the payments referenced on the invoices via ACH to one of the SUPINA-SALTUS Accounts. SUPINA-SALTUS perpetrated this aspect of the fraud in at least two different ways:

iii. The Legitimate Vendor Invoices: SUPINA-SALTUS sometimes issued fraudulent invoices for Legitimate Vendors as if they had provided goods or services to the PMRC, but then transmitted the payments for those invoices into her own accounts. For example, SUPINA-SALTUS periodically submitted invoices in the PMRC billing system purportedly from a real vendor ("Legitimate Vendor-1") for office supplies, such as printer toner, ink cartridges, and other items. The purported invoices from Legitimate Vendor-1 were on standard 8.5 x 11-inch paper and bore the vendor's name and logo on the top left corner of the page. In general, the invoices from Legitimate Vendor-1 contained other identifying information, including order number, date of order, invoice number, date of charge, items shipped, item number, item description, price, quantity, discounts, and subtotal. Additionally, the invoices also listed "Method of Payment" and indicated that the invoice was "PAID" with a "Visa ending in *1946."[4] The credit card number ending in 1946 was identified as a credit card issued to the PMRC's Deputy Ambassador (the "1946 Card"). A subsequent reconciliation of the 1946 Card's statement by representatives of the PMRC revealed that the payments made for the purported invoices from Legitimate Vendor-1 were not actually charged to that card. Instead, a review of the PMRC Account revealed that the payments for the invoices were actually wired via ACH directly from the PMRC Account into one of the SUPINA-SALTUS Accounts.

iv. The Fake Vendor Invoices: SUPINA-SALTUS separately created invoices for Fake Vendors, and then paid out the owed amounts into her own accounts. For

[4] In or about August 2025, I corresponded with representatives of Legitimate Vendor-1's Asset Protection and Retail Loss Prevention department. In sum and substance, I emailed those representatives several of the purported invoices from Legitimate Vendor-1 issued by SUPINA-SALTUS, including the invoice described in Paragraph 6(h)(iii) above. On or about August 28, 2025, after reviewing the invoices, one of the representatives confirmed that the invoices were not legitimate invoices from Legitimate Vendor-1.

example, beginning on or about April 13, 2022, SUPINA-SALTUS submitted invoices for “large garbage removal” from a company identified as “Vitlov Inc.,” typically in the amount of $1,400.[5] This amount and vendor invoice became a near-monthly recurring invoice submitted by SUPINA-SALTUS for PMRC payment. A review of bank records for both the PMRC Account and the SUPINA-SALTUS Accounts revealed that the payments for the purported invoices to “Vitlov Inc.” were actually made via ACH directly into the 1552 Account. Specifically, there are approximately twelve payments of $1,400 from the PMRC Account to the 1552 Account between on or about April 13, 2022, and on or about August 24, 2023. As an example, on or about April 13, 2022, an ACH transfer was made in the amount of $1,400 payable from the PMRC Account to the 1552 Account. This was the same amount and “charge” date as reflected in a purported “Vitlov Inc.” invoice numbered 2103 and submitted to the PMRC. Below is an image of this Fake Invoice, with an added circle to highlight what appear to be SUPINA-SALTUS’s handwritten initials in the bottom-right corner, *see* ¶ 6(h) n.3 *supra*:



Vitlov Inc. INVOICE

30-67 44th Street
Astoria, NY 11103

SERVICES TO:
Permanent Mission of Croatia to UN
820 Second Avenue 18 &19 fl
New York, NY 10017

INVOICE NUMBER 2103
INVOICE DATE April 13, 2022

13-Apr-22

QUANTITY	DESCRIPTION		UNIT PRICE	AMOUNT
4hrs	Large garbage removal	9:00-1:00	350.00	1,400.00
			SUBTOTAL	1,400.00
			TAX	0.00
			PAY THIS AMOUNT	$1,400.00

MAKE ALL CHECKS PAYABLE TO:
Direct deposit

J.Sc

THANK YOU FOR YOUR BUSINESS!

[5] Based on my review of publicly available records, I have been unable to identify a “Vitlov Inc.” operating in the New York City metropolitan area, or more specifically, any entity with that name based at 30-67 44th Street in Astoria, New York. Representatives from the PMRC have separately confirmed that “Vitlov Inc.” was not a company known to provide goods or services to the PMRC during the period in which these invoices were dated.

<u>SUPINA-SALTUS Used the Embezzled Funds on Personal Expenses</u>

i. Based on my financial review and analysis of the SUPINA-SALTUS Accounts and the PMRC Account, as well as my conversations with other law enforcement officers, the investigation to date has traced the vast majority of the PMRC funds embezzled by SUPINA-SALTUS, and found they were used on personal expenses, totaling approximately hundreds of thousands of dollars, ranging from her children's college tuition; expensive lifestyle, travel, airfare, and hotel expenses; shopping at various stores and online purchases; rent and mortgage payments; ATM withdrawals; and various miscellaneous expenses. Based on my training and experience, these expenditures appear consistent with personal use rather than any employment purposes associated with the PMRC.

j. For example, I have learned the following about multiple series of transactions that occurred in or about July, August, and December 2021:

i. On or about July 29, 2021, the 1552 Account received two wire transfers from the PMRC Account in the amounts of $15,314.82 and $560.00.

ii. Approximately four days later, on or about August 2, 2021, the 1552 Account used that money, at least in part, to send an electronic payment in the amount of $15,694.17 to an educational institution based in Arizona ("Educational Institution-1"). Based on my review of records from Educational Institution-1, I believe this payment was towards SUPINA-SALTUS's son's tuition at that school.

iii. Similarly, on or about December 28, 2021, the 1552 Account received a wire transfer in the amount of $14,889.91 from the PMRC Account.

iv. Two days later, on or about December 30, 2021, the 1552 Account used that money, at least in part, to fund an electronic payment to Educational Institution-1 in the amount of $10,488.60. Based on my review of records from Educational Institution-1, I believe this payment was also towards SUPINA-SALTUS's son's tuition at Educational Institution-1.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of RENATA SUPINA-SALTUS, the defendant, and that she be arrested, and imprisoned or bailed, as the case may be.

s/ Chad Lindsly / otw
Chad Lindsly
Special Agent
Homeland Security Investigations

Sworn to me through the transmission of
this Complaint by reliable electronic
means (telephone), this 31st day of March, 2026.

THE HONORABLE ONA T. WANG
United States Magistrate Judge
Southern District of New York