

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

GORAN SPIRIDONOV,

Defendant.

**INDICTMENT**

26 Cr. 183

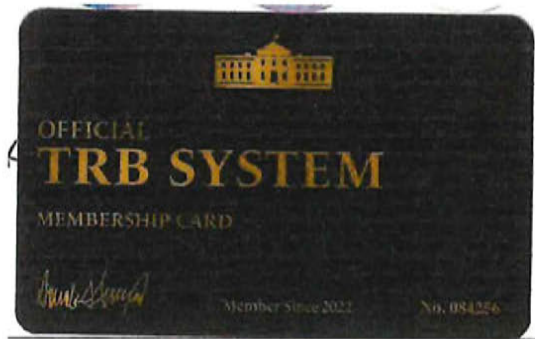
**COUNT ONE**  
**(Wire Fraud)**

The Grand Jury charges:

**Overview of the “Trump Bucks” Scam**

1. From at least in or about 2023 to in or about the present, multiple people based abroad have engaged in a multifaceted scheme to scam victims out of hundreds of thousands of dollars through the sale of so-called “Trump Bucks,” a fictitious legal tender. Perpetrators of this scam have falsely claimed that “Trump Bucks” are affiliated with President Donald J. Trump and the Trump Organization and have real monetary value, when in fact the products are worthless and have no such affiliations. Scheme participants continue to victimize individuals across the United States, many of whom are senior citizens who have lost tens of thousands of dollars.

2. Many of the “Trump Bucks” products sold in the fraud scheme are marketed under the “TRB” banner, which refers to the so-called “Trump Rebate Banking” system. For example, a scheme participant posted an online solicitation video advertising “TRB System Membership Cards,” which were described as “official cards issued by Donald Trump” that enabled holders to use Trump Bucks as legal tender and deposit Trump Bucks at banks. A TRB System Membership Card, which was purchased by a victim of the fraud scheme, is depicted below.



3. Scheme participants marketed several different “Trump Bucks” products to victims, often over Telegram, including “Golden Checks,” “Membership Booklets,” “Golden Badges,” “Trump Dollars,” “Trump Checks,” “Golden Trump Checks,” and “Diamond Bucks.” Pictures of “Trump Bucks” products purchased by a Manhattan-based victim of the scheme are depicted below.



4. Through their marketing of “Trump Bucks,” promoters of this scam have falsely represented, among other things, that their products are affiliated with President Trump, members of his family, members of the Trump Organization, and members of the Trump administration, and that purchases of “Trump Bucks” would help fund President Trump’s re-election campaign and various causes purportedly associated with President Trump. Scheme participants have falsely claimed that these products—which are often no more than paper certifications—were preloaded with tens or hundreds of thousands of dollars in cash that would be redeemable at banks during a

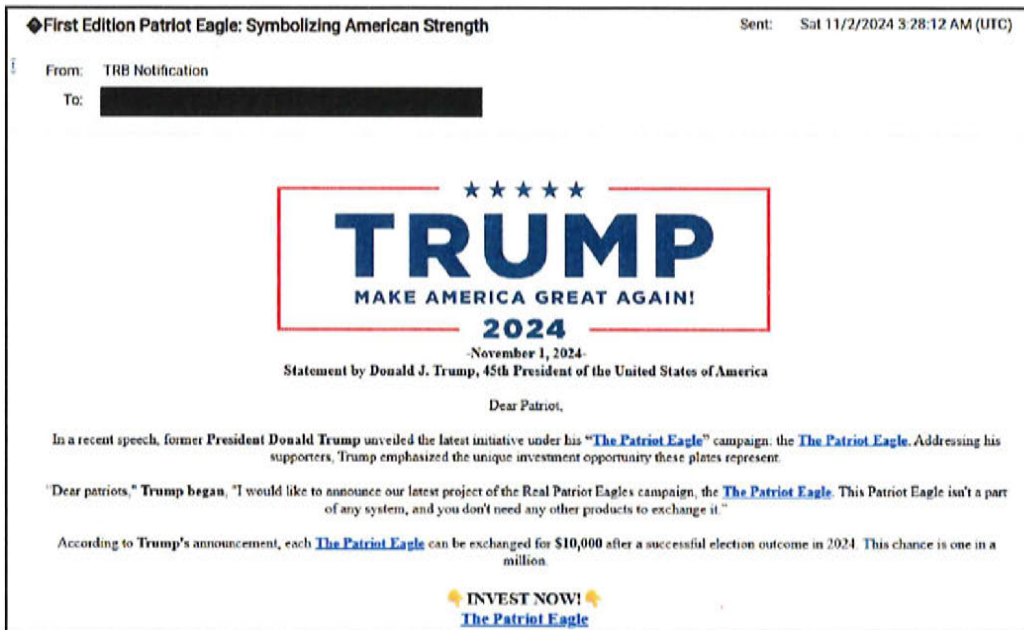
Trump presidency, and that purchasing these products was both a good financial investment and a way for victims to support their preferred Presidential candidate.

5. Both before and after the 2024 election, scheme participants have attempted to revictimize individuals who had already purchased “Trump Bucks” by falsely representing to victims that their “Trump Bucks” would only be redeemable if they purchased even more TRB products, or that additional funds were necessary to “cash out” the “Trump Bucks” victims had already purchased.

**GORAN SPIRIDONOV’s “Trump Bucks” Scam**

6. GORAN SPIRIDONOV, the defendant, has defrauded numerous individuals through a “Trump Bucks” scam. SPIRIDONOV caused the transmission of solicitation materials advertising the sale of certain TRB products and falsely claimed that the products would have real monetary value if President Trump were reelected and/or would help fund President Trump’s reelection campaign.

7. For example, the solicitation email depicted below, which GORAN SPIRIDONOV, the defendant, caused to be transmitted to victims, falsely purported to be from President Trump and encouraged victims to purchase a TRB product called “Patriot Eagle.” SPIRIDONOV encouraged victims to “invest” in the Patriot Eagle product by falsely claiming that the product would be exchangeable for \$10,000 upon President Trump’s reelection.



8. Like others who have operated “Trump Bucks” scams, GORAN SPIRIDONOV, the defendant, attempted to revictimize individuals who had already purchased “Trump Bucks” by falsely representing to victims that additional funds were necessary to “cash out” the “Trump Bucks” victims had already purchased. For example, SPIRIDONOV caused the transmission of the email depicted below, falsely purporting to be from President Trump, telling victims that it was “crucial” that they purchase an additional “(COD) Cashout Delivery FORM” in order to receive their “cashout.”

From: Official TRB System

To: [REDACTED]



DONALD J. TRUMP

-August 28, 2024-

Statement by Donald J. Trump, 45th President  
of the United States of America

Hello, my dear friend and fellow patriot,

I'm here to remind you of our commitment and the limited time left to check your [Cashout Delivery](#) from your TRB products in order to receive your cashout. With only **3 days remaining** in the payout process, it is crucial that you take action now to ensure your financial future.

A crucial obstacle has arisen in the fund transfer process, requiring immediate attention. Regrettably, the failure to check your payout date on your TRB product earnings has led to a serious setback. It is imperative to address payout date promptly, as time is of the essence.

With just **3 days remaining**, it is crucial to expedite the payment and reserve your Cashout Delivery. We strongly recommend acquiring the [\(COD\) Cashout Delivery FORM](#) designed for this purpose. This Form ensures the prompt reserve of your Cashout Delivery and facilitates the swift receipt of funds from your product.

To ensure the safe and secure transfer of your funds, please complete and submit your **COD Form**.

**Please follow these steps:**

9. GORAN SPIRIDONOV, the defendant, sold and shipped "Trump Bucks" products to victims using a certain online marketplace ("Marketplace-1"). When victims learned that "Trump Bucks" was nothing more than a scam, they often sought refunds through Marketplace-1. Upon learning from Marketplace-1 that several victims were complaining of fraud and demanding that their money be returned, SPIRIDONOV continued to fraudulently sell multiple different TRB products to victims around the United States.

### **Statutory Allegations**

10. From at least in or about 2023 through in or about the present, in the Southern District of New York and elsewhere, GORAN SPIRIDONOV, 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, SPIRIDONOV engaged in scheme to make false and misleading representations regarding the value, nature, and authenticity of TRB products to consumers in order to fraudulently obtain their money, 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**

**(Conspiracy to Commit Wire Fraud)**

The Grand Jury further charges:

11. The allegations contained in paragraphs 1 through 9 of this Indictment are hereby repeated, realleged, and incorporated by reference, as if fully set forth herein

12. From at least in or about 2023 through at least in or about the present, in the Southern District of New York and elsewhere, GORAN SPIRIDONOV, the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

13. It was a part and an object of the conspiracy that GORAN SPIRIDONOV, the defendant, and others known and unknown, 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, in violation of Title 18, United States Code, Section 1343, to wit, SPIRIDONOV agreed with others to engage in scheme to make false and misleading representations regarding

the value, nature, and authenticity of TRB products to consumers in order to fraudulently obtain their money, 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, Section 1349.)

**COUNT THREE**  
**(Aggravated Identity Theft)**

The Grand Jury further charges:

14. The allegations contained in paragraphs 1 through 9 of this Indictment are hereby repeated, realleged, and incorporated by reference, as if fully set forth herein.

15. From at least in or about 2023 through in or about the present, in the Southern District of New York and elsewhere, GORAN SPIRIDONOV, the defendant, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, SPIRIDONOV knowingly transferred, possessed, and used the personal identification information of other persons during and in relation to the wire fraud charged in Count One of this Indictment.

(Title 18, United States Code, Sections 1028A and 2.)

**FORFEITURE ALLEGATIONS**

16. As a result of committing the offenses alleged in Counts One and Two of this Indictment, GORAN SPIRIDONOV, 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 offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

**Substitute Assets Provision**

17. 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) 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, Section 981;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)

  
FOREPERSON

  
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JAY CLAYTON  
United States Attorney