

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

KRISTINA JANEVA,

Defendant.

INDICTMENT

26 Cr.

26 CRIM 0182

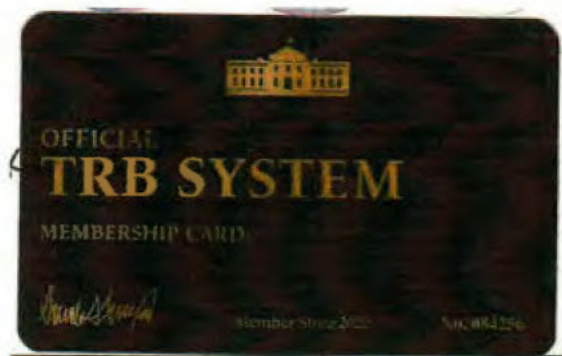
COUNT ONE
(Wire Fraud)

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 have 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.

KRISTINA JANEVA’s “Trump Bucks” Scam

6. KRISTINA JANEVA, the defendant, has defrauded numerous individuals through a “Trump Bucks” scam. JANEVA 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. Some of these fraudulent communications falsely claimed to be “on behalf of Donald J. Trump” or “FROM THE DESK OF DONALD J. TRUMP.”

7. Like others who have operated “Trump Bucks” scams, KRISTINA JANEVA, 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, JANEVA caused the transmission of an email that urged victims to “cash out” their TRB products through the “Bank of Trump Organization,” an entirely fictitious financial institution. JANEVA created a website for the supposed Bank of Trump Organization, which advertised certificates victims would receive upon

cashout and the payment of an additional fee to the scheme participants. The certificates, one of which is depicted below, falsely claimed to be issued by the Trump Organization.

TRUMP ORGANIZATION
7725 5th Ave, New York, NY 10022

Certificate Of Ownership

This is to certify that you are TRB product owner on the above subject matter under the terms and conditions stated herein in the original agreement and valid documents. It certifies our firm's acknowledgment of the ownership benefits under the document and our commitment to excellent services.

DESCRIPTION

OWNER _____
ADDRESS _____
NATIONALITY _____
OWNER ID _____
DATE OF DEPOSIT _____

We thank you for most valued patronage and re-affirm our commitment to excellent services.

QR CODE

RUBY CERTIFICATE

\$4999

70% OFF \$13,600

- 400 slots (\$10/ slot)
- Premium Patriot Membership
- Unique RUBY Certificate

SALE

8. KRISTINA JANEVA, 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, JANEVA continued to fraudulently sell multiple different TRB products to victims around the United States.

Statutory Allegations

9. From at least in or about 2023 through in or about the present, in the Southern District of New York and elsewhere, KRISTINA JANEVA, 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, JANEVA 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:

10. The allegations contained in paragraphs 1 through 8 of this Indictment are hereby repeated, realleged, and incorporated by reference, as if fully set forth herein

11. From at least in or about 2023 through at least in or about the present, in the Southern District of New York and elsewhere, KRISTINA JANEVA, 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.

12. It was a part and an object of the conspiracy that KRISTINA JANEVA, 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, JANEVA 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:

13. The allegations contained in paragraphs 1 through 8 of this Indictment are hereby repeated, realleged, and incorporated by reference, as if fully set forth herein.

14. From at least in or about 2023 through in or about the present, in the Southern District of New York and elsewhere, KRISTINA JANEVA, 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, JANEVA 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

15. As a result of committing the offenses alleged in Counts One and Two of this Indictment, KRISTINA JANEVA, 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

16. 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



JAY CLAYTON
United States Attorney