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12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 v.

17 JORGE ABRAMOV,

18 Defendant.

Case No. 2:21-MJ-00061-EJY

SEALED COMPLAINT for violation of:
Title 18, United States Code, Section
1344(2) - Bank Fraud.

19 Before the Honorable Elayna J. Youchah, United States Magistrate Judge, Las
20 Vegas, Nevada, the undersigned being first duly sworn states:

21 COUNT ONE
Bank Fraud
22 (18 U.S.C. § 1344(2))

23 On or about May 21, 2020, in the State and Federal District of Nevada,

24 JORGE ABRAMOV,

1 defendant herein, knowingly executed and attempted to execute a scheme and artifice to
2 obtain the moneys, funds, credits, assets, securities, and property owned by and under the
3 custody and control of Bank 2 d/b/a, a financial institution, by means of materially false
4 and fraudulent pretenses, representations, and promises, to wit: ABRAMOVS caused the
5 disbursement of a \$136,200 Paycheck Protection Program loan to the Bank 2 d/b/a Bank 3
6 account ending in 5936 held in the name of National Legal Advisors In Care Corp., in
7 violation of Title 18, United States Code, Section 1344(2).

8 PROBABLE CAUSE

9 Complainant, Robert Scott, Special Agent with the Federal Bureau of Investigation
10 (“FBI”), states the following as and for probable cause.

11 1. I make this statement in support of a criminal complaint charging JORGE
12 ABRAMOVS with violating Title 18, United States Code, Section 1344(2) (Bank Fraud).

13 2. I am a Special Agent (“SA”) of the FBI and have been so employed since
14 September of 2017. As an FBI Special Agent, I am assigned to the FBI Las Vegas
15 Division’s Economic Crimes Unit, and am responsible for investigating a variety of the the
16 following violations: Money Laundering, White Collar Crimes, and Health Care Fraud.
17 Prior to my appointment as a Special Agent of the FBI, I supported a variety of criminal
18 investigations for approximately two years for the FBI. In order to become a Special Agent,
19 I underwent 22 weeks of training at the FBI Academy in Quantico, VA. At the FBI
20 Academy I was trained to investigate violations of the laws of the United States, to collect
21 evidence in cases in which the United States is or may be a party in interest, and to perform
22 other duties imposed by law. I am familiar with, and have participated in, the normal
23 methods of investigation, including, but not limited to: visual and video surveillance,
24 interviewing witnesses, interrogations, executing search and arrest warrants, the use of

1 consensually-monitored video and audio recordings, and debriefing of informants and
2 cooperating witnesses. As part of my training and experience, I have participated in and
3 written warrants and affidavits for searches and seizures.

4 3. I respectfully submit that this Affidavit establishes probable cause in support
5 of the issuance of a Criminal Complaint and arrest warrant for JORGE ABRAMOVS
6 (“ABRAMOV”) for Bank Fraud in violation of 18 U.S.C. § 1344(2). The information
7 contained herein is based, on among other things, my review of records and documents
8 obtained during the course of this investigation, information conveyed by other FBI SAs
9 and other employees or agents of the FBI, personnel from the United States Small Business
10 Administration, witnesses, and my experience and background as an FBI SA.

11 4. This Affidavit is submitted solely to establish probable cause in support of
12 this Criminal Complaint and arrest warrant; it does not contain all information known to
13 me regarding this matter.

14 **Paycheck Protection Program**

15 5. The Coronavirus Aid, Relief, and Economic Security (“CARES”) Act is a
16 federal law enacted in or around March 2020 and designed to provide emergency financial
17 assistance to the millions of Americans who are suffering the economic effects caused by
18 the COVID-19 pandemic. One source of relief provided by the CARES Act was the
19 authorization of up to \$349 billion in forgivable loans to small businesses for job retention
20 and certain other expenses, through a program referred to as the Paycheck Protection
21 Program (“PPP”).

22 6. In order to obtain a PPP loan, a qualifying business submitted a PPP loan
23 application, which was signed by an authorized representative of the business. The PPP
24 loan application required the business (through its authorized representative) to

1 acknowledge the program rules and make certain affirmative certifications in order to be
2 eligible to obtain the PPP loan. In the PPP loan application, the small business (through its
3 authorized representative) stated, among other things, its: (a) average monthly payroll
4 expenses; and (b) number of employees. These figures are used to calculate the amount of
5 money the small business is eligible to receive under the PPP.¹ In addition, businesses
6 applying for a PPP loan were required to provide documentation showing their payroll
7 expenses.

8 7. A PPP loan application was processed by a participating lender, such as a
9 financial institution. If a PPP loan application was approved, the participating lender
10 funded the PPP loan using its own monies. While the lender issued the PPP loan, the
11 Small Business Administration (“SBA”) provided a guarantee to the lender for the PPP
12 loan. Data from the application, including information about the borrower, the total
13 amount of the loan, and the listed number of employees, was transmitted by the lender to
14 the SBA in the course of processing the loan.

15 8. PPP loan proceeds were required to be used by the business on certain
16 permissible expenses—payroll costs, interest on mortgages, rent, and utilities. The PPP
17 allowed the interest and principal on the PPP loan to be entirely forgiven if the business
18 spends the loan proceeds on these expense items within a designated period of time and
19 uses a certain percentage of the PPP loan proceeds on payroll expenses.

20 The Fraudulent Scheme

21 9. As detailed below, from approximately April 2020 until at least June 2020,
22 ABRAMOVS perpetrated a scheme to defraud at least seven financial institutions,
23

24 ¹ The maximum allowable PPP loan amount was calculated by taking the company's
average monthly payroll and multiplying that figure by 2.5.

1 identified herein as Credit Union 1, Bank 1, Bank 2 d/b/a/ Bank 3, Bank 4, Bank 5, Bank
2 6, and Bank 7. The seven financial institutions are insured by the Federal Deposit
3 Insurance Corporation (“FDIC”) or the National Credit Union Administration
4 (“NCUA”). The specific execution of this scheme charged in Count One of this Complaint
5 is described in Paragraph 18(c). The other executions of this scheme described below
6 further evidence ABRAMOVS’ intent to defraud.

7 10. ABRAMOVS fraudulently obtained monies through submitting false
8 applications for PPP loans, in which ABRAMOVS misrepresented the number of
9 employees and the amount of revenue and payroll his companies had. ABRAMOVS
10 submitted false PPP loan applications for entities named National Investment Group
11 Corporation (“NIGC”) (at least six applications, as described in paragraphs 16-17 below);
12 National Legal Advisors In Care Of, or National Legal Advisors (“NLA”) (at least five
13 applications, as described in paragraphs 18-19 below); and National Investment Group
14 (one application, as described in paragraphs 20-21 below).

15 11. The Nevada Secretary of State’s website contains business entity information
16 for what appear to be NIGC and National Legal Advisors in Care Of. This information
17 shows the same address for these two entities on W. Lake Mead Boulevard in Las Vegas at
18 the time of the applications. The NIGC’s address was later updated to an address on S.
19 Fort Apache Road in Las Vegas in October 2020. Each of the 12 applications below listed
20 variations of this S. Fort Apache Road address as the business address for the applying
21 entity.

22 12. Investigators conducted surveillance of the S. Fort Apache Road address in
23 or around autumn of 2020. This address appeared to be a commercial storefront.
24 Investigators observed an individual similar in appearance to ABRAMOVS (based on his

1 driver's license photo and that approximately two of the vehicles this person drove were
2 registered to Abramovs). Investigators also observed approximately two other individuals
3 who might have been employees at this storefront during business hours (as well as several
4 individuals who appeared to be working as cleaners in the space).

5 13. As a result of this scheme, ABRAMOVS fraudulently obtained
6 approximately \$1,986,737.46 in PPP loan proceeds.

7 14. On each loan application, ABRAMOVS certified that during the period
8 beginning on February 15, 2020 and ending on December 31, 2020, the Applicant had not
9 and would not receive another loan under the PPP. Instead, ABRAMOVS received at least
10 six loans in the name of NIGC and at least five loans in the name of NLA.

11 15. On each loan application, ABRAMOVS certified that he would use the loan
12 proceeds for approved purposes under the PPP loan program, including payroll, rent and
13 utilities. Instead, financial analysis shows that ABRAMOVS spent the money on purchases
14 of luxury items for himself, including the purchase of a 2020 Bentley, a 2020 Tesla, and
15 two condominiums located in Veer Towers in Las Vegas, Nevada.

16 Misrepresentations on PPP Applications

17 16. Between approximately April 16, 2020 and June 2, 2020, ABRAMOVS
18 submitted at least six applications for PPP loans for NIGC. During the same time frame,
19 ABRAMOVS was listed as the President, Secretary, Treasurer, and Director of this entity
20 according to the Nevada Secretary of State's website.² ABRAMOVS signed each of the
21 loan applications as the authorized representative of NIGC. On each loan application,
22 ABRAMOVS certified that the "funds will be used to retain workers and maintain payroll

23 _____
24 ² On October 14, 2020, the information was updated to list ABRAMOVS as the President,
and Individual 1 as the Secretary and Treasurer.

1 or make mortgage interest payments, lease payments, and utility payments, as specified
2 under the Paycheck Protection Program Rule; I understand that if the funds are knowingly
3 used for unauthorized purposes, the federal government may hold me legally liable, such as
4 for charges of fraud.”

5 a. On or about April 16, 2020, ABRAMOVS signed a PPP loan
6 application that was submitted to Bank 5 for NIGC. In the loan application, ABRAMOVS
7 listed the EIN of NIGC as xx-xxx5605, which is actually associated with an entity not
8 named NIGC. ABRAMOVS stated that NIGC had 16 employees, and an average monthly
9 payroll of \$53,865. On May 4, 2020, a PPP loan of \$134,600 was disbursed to NIGC and
10 deposited in Bank 5 account ending in 1506.³

11 b. On or about April 29, 2020, ABRAMOVS signed a PPP loan
12 application that was submitted to Credit Union 1 on behalf of NIGC. On the application,
13 ABRAMOVS used EIN/TIN number xx-xxx7928, which is the actual EIN associated with
14 NIGC. ABRAMOVS claimed NIGC had 18 employees and an average monthly payroll of
15 \$64,797. On May 19, 2020, loan proceeds of \$161,749 were disbursed to Credit Union 1
16 account ending in 5746.⁴

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19 ³ On April 27, 2020, ABRAMOVS opened Bank 5 account 1506 in Las Vegas, Nevada, in
20 the name of “National Investments [sic] Group Corporation” (NIGC), EIN xx-xxx5605.
21 ABRAMOVS was the sole signer for the account. The address on the account for NIGC is
22 the S. Fort Apache Road address.

23 ⁴ On April 30, 2020, ABRAMOVS opened Credit Union 1 account 5746 in Las Vegas,
24 Nevada, in the name of NIGC, EIN xx-xxx7928. ABRAMOVS was the sole signer for the
account. Records provided by Credit Union 1 also reflect “Business and Owner
Information” records for National Legal Advisors In Care Of (EIN xx-xxx9157), and
National Legal Advisors (EIN xx-xxx6095), which appear to share Credit Union 1 account
5746. Credit Union 1 records show the S. Fort Apache Road address for all three
companies, except for National Legal Advisors, which contains the same address but no
suite number.

1 c. On or about May 8, 2020, ABRAMOVS signed a PPP Borrower
2 Application Form that was submitted to Bank 7 using the entity name of NIGC. On the
3 application, ABRAMOVS used Entity EIN/TIN number xx-xxx7276, which is actually
4 associated with National Legal Advisors. ABRAMOVS claimed NIGC had 17 employees
5 and an average monthly payroll of \$59,101. On May 11, 2020, loan proceeds of \$147,751
6 were disbursed to Bank 7 account ending in 9740.⁵

7 d. On or about May 22, 2020, ABRAMOVS signed a PPP loan
8 application that was submitted to Bank 2, which operates in Nevada under the name of
9 Bank 3, using the entity name of NIGC. On the application, ABRAMOVS used EIN/TIN
10 number xx-xxx4968. On May 20, 2020, EIN xx-xxx4968 was established for NIGC.
11 ABRAMOVS claimed NIGC had 49 employees and an average monthly payroll of
12 \$55,235. On May 26, 2020, loan proceeds of \$138,000 were disbursed to Bank 3 account
13 ending in 9103.⁶

14 e. On or about May 25, 2020, ABRAMOVS signed a PPP loan
15 application that was submitted to Bank 1 using the entity name of NIGC. On the
16 application, ABRAMOVS used EIN/TIN number xx-xxx2701. On May 25, 2020, EIN
17 number xx-xxx2701 was established for an entity not named NIGC. ABRAMOVS claimed
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22 ⁵ On January 6, 2020, ABRAMOVS opened account 9740 in the name of NIGC, EIN xx-
xxx7928. ABRAMOVS was the sole signer for the account. The address for the account was
23 listed as the S. Fort Apache Road address.

24 ⁶ On May 21, 2020, ABRAMOVS opened account 9103 in Las Vegas, Nevada, in the name
of NIGC, EIN xx-xxx4968. ABRAMOVS was the sole signer for the account. The address
for the account was listed as the S. Fort Apache Road address.

1 NIGC had 35 employees and an average monthly payroll of \$37,361.27. On May 29, 2020,
2 loan proceeds of \$93,403.16 were disbursed to Bank 1 account ending in 4132.⁷

3 f. On or about June 2, 2020, ABRAMOVS signed a PPP loan
4 application that was submitted to Bank 6 using the entity name of NIGC. On the
5 application, ABRAMOVS used EIN/TIN number xx-xxx2661, which was established for
6 an entity not named NIGC on May 25, 2020. ABRAMOVS claimed NIGC had 35
7 employees and an average monthly payroll of \$79,710.42. On June 4, 2020, loan proceeds
8 of \$199,276.04 were disbursed to Bank 6 account ending in 9813.⁸

9 17. There is reason to believe each of the loan applications in paragraph 16
10 contained false statements and misrepresentations:

11 a. ABRAMOVS listed a different EIN/TIN for NIGC for each of the
12 applications. Five of the EINs are associated with entities other than NIGC, and three of
13 the EINs were obtained on the same day or within days of the loan application being
14 signed. Furthermore, IRS filing records show that as of August 28, 2020, the IRS has not
15 received any filed tax returns for any of the EIN/TIN numbers listed by NIGC in the
16 applications.

17 b. In each of the loan applications, ABRAMOVS listed a different
18 amount of average monthly payroll. In all but two of the loan applications, ABRAMOVS
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21 ⁷ On May 26, 2020, ABRAMOVS opened account 4132 in Las Vegas, Nevada, in the name
22 of NIGC, EIN xx-xxx2701. ABRAMOVS was the sole signer for the account. The address
for NIGC was listed as the S. Fort Apache Road address.

23 ⁸ On June 4, 2020, ABRAMOVS opened account 9813, in the name of NIGC, EIN xx-
24 xxx2661. Linked account ending in 7577 was opened at the same time. ABRAMOVS is the
sole signer for the accounts. The address for the accounts was listed as the S. Fort Apache
Road address.

1 listed a different number of employees, further indications that ABRAMOVS provided
2 false information on the applications.

3 c. Employers who pay more than \$225 of payroll in any quarter for
4 employees in Nevada are required by Nevada law to pay for unemployment insurance with
5 the State. In August 2020, a query to the Nevada Department of Employment, Training
6 and Rehabilitation (“DETR”) showed that DETR had no records of any payments for
7 unemployment insurance made by NIGC.

8 d. The first PPP loan NIGC received was disbursed on May 4, 2020.
9 After that date, ABRAMOVS falsely certified on four separate applications that NIGC had
10 not received a PPP loan.

11 18. Between approximately May 10, 2020 and June 5, 2020, ABRAMOVS
12 submitted at least five additional applications for PPP loans on behalf of National Legal
13 Advisors In Care Of (“NLA”). ABRAMOVS is listed as the President, Secretary,
14 Treasurer, and Director of this entity according to the Nevada Secretary of State’s website.
15 ABRAMOVS signed each of the loan applications as the authorized representative. On
16 each loan application, ABRAMOVS certified that the “funds will be used to retain workers
17 and maintain payroll or make mortgage interest payments, lease payments, and utility
18 payments, as specified under the Paycheck Protection Program Rule; I understand that if
19 the funds are knowingly used for unauthorized purposes, the federal government may hold
20 me legally liable, such as for charges of fraud.”

21 a. On or about May 10, 2020, ABRAMOVS signed a PPP loan
22 application that was submitted to Credit Union 1 using the entity name of NLA. On the
23 application, ABRAMOVS used EIN/TIN number xx-xxx9157, which is in fact associated
24 with an entity not named NLA. ABRAMOVS claimed NLA had 19 employees and an

1 average monthly payroll of \$58,383.25. On May 20, 2020, loan proceeds were disbursed to
2 Credit Union 1 account 5746 for \$145,957.⁹

3 b. On or about May 10, 2020, ABRAMOVS signed a PPP loan
4 application that was submitted to Bank 1 using the entity name of NLA. On the
5 application, ABRAMOVS used EIN/TIN number xx-xxx3813, which was established for
6 National Legal Advisors InCare on May 15, 2020. ABRAMOVS claimed NLA had 19
7 employees and an average monthly payroll of \$86,250. On May 20, 2020, loan proceeds of
8 \$215,625 were disbursed to a Bank 1 account ending in 3765.¹⁰

9 c. On or about May 21, 2020, ABRAMOVS signed a PPP loan
10 application that was submitted to Bank 2 using the entity name of NLA. This is the
11 execution of ABRAMOVS's scheme that is charged in Count One of the Complaint. On
12 the application, ABRAMOVS used Entity EIN/TIN number xx-xxx7955, which was
13 established for National Legal Advisors In Care on May 13, 2020, approximately 8 days
14 before ABRAMOVS signed the loan application. ABRAMOVS claimed in the PPP loan
15 application that NLA had 77 employees and an average monthly payroll of \$54,482. In
16 support of the listed payroll, ABRAMOVS provided (among other documents) a purported
17 IRS Form 941 for Q1 2020 for National Legal Advisors In Care Of, EIN xx-xxx7955. (IRS
18 Form 941 is a quarterly federal tax filing on which companies identify the number of
19 employees who received wages, tips, or other compensation for that quarter as well as the
20 amount of federal income taxes withheld, and other information.) However, investigators
21 subsequently determined that no Form 941 had in fact been filed with the IRS by this EIN

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23 ⁹ ABRAMOVS was the sole signer for the account. *See supra*, n.4.

24 ¹⁰ On May 15, 2020 ABRAMOVS opened account 3765 in Las Vegas, Nevada, in the name
of National Legal Advisors In Care, EIN xx-xxx3813. ABRAMOVS is the sole signer for
the account. The address for the account was listed as the S. Fort Apache Road address.

1 for any of tax years 2018, 2019, or Q1 2020, indicating that the Form 941 ABRAMOVS
2 submitted was forged. On May 22, 2020, loan proceeds were disbursed to a Bank 3 account
3 ending in 5936, located within the State and Federal District of Nevada, for \$136,200.¹¹

4 d. On or about June 1, 2020, ABRAMOVS signed a PPP loan
5 application that was submitted to Credit Union 1 using the entity name of NLA. On the
6 application, ABRAMOVS used EIN/TIN number xx-xxx6095, which was established for
7 an entity not named NLA on June 1, 2020. He claimed NLA had 31 employees and an
8 average monthly payroll of \$86,250. On June 15, 2020, loan proceeds were disbursed to
9 Credit Union 1 account 5746 for \$215,624.¹²

10 e. On or about June 5, 2020, ABRAMOVS signed an application to
11 Bank 4 using the entity name of NLA. On the application, ABRAMOVS used EIN/TIN
12 number xx-xxx1317, which was established for an entity not named NLA on June 1, 2020.
13 ABRAMOVS claimed NLA had 35 employees and an average monthly payroll of \$79,710.
14 The loan proceeds were disbursed via cashier's check in the amount of \$199,276.23. On
15 June 9, 2002, the cashier's check was deposited in full to a Bank 7 account ending in
16 9732.¹³

17 19. There is reason to believe that each of the loan applications in paragraph 18
18 contained false statements and misrepresentations:

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21 ¹¹ On May 19, 2020, ABRAMOVS opened account 5936 in Las Vegas, Nevada, in the name
22 of National Legal Advisors in Care Corp, EIN xx-xxx7955. ABRAMOVS is the sole signer
23 for the account. The address for the account was listed as the S. Fort Apache Road address.

24 ¹² ABRAMOVS was the sole signer for the account. *See supra*, n.4.

¹³ On January 6, 2020, ABRAMOVS opened account 9732 in the name of NIGC, EIN xx-
xxx7928. The bank statements for the account are sent to NIGC dba National Legal
Advisors. ABRAMOVS is the sole signer for the account. The address for the account was
listed as the S. Fort Apache Road address.

1 a. ABRAMOVS used a different EIN number for each of the
2 applications, despite the fact that they all purport to be on behalf of the same entity. All of
3 the EINs are associated with different entities, and four of the five EINs used were created
4 on or around the time that the loan application was signed. As of August 28, 2020, the IRS
5 had received no filed tax returns for the any of the EIN/TIN numbers associated with
6 NLA.

7 b. In each of the loan applications, ABRAMOVS listed a different
8 amount of average monthly payroll. In all but two of the loan applications, he listed a
9 different number of employees, further indications that he provided false information on
10 the applications.

11 c. In August 2020, a query to DETR showed that DETR had no
12 records of any payments for unemployment insurance made by NLA.

13 d. The first PPP loan NLA received was disbursed on May 20, 2020.
14 After that date, ABRAMOVS falsely certified on three separate applications that NLA had
15 not received a PPP loan.

16 20. On or about June 15, 2020, ABRAMOVS signed a PPP loan application to
17 Bank 4 using the entity name of National Investment Group. On the loan application,
18 ABRAMOVS certified that the “funds will be used to retain workers and maintain payroll
19 or make mortgage interest payments, lease payments, and utility payments, as specified
20 under the Paycheck Protection Program Rule; I understand that if the funds are knowingly
21 used for unauthorized purposes, the federal government may hold me legally liable, such as
22 for charges of fraud.” On the application, ABRAMOVS used EIN/TIN number xx-
23 xxx7848, which is associated with an entity not named National Investment Group and
24 was created on June 11, 2020. He claimed National Investment Group had 41 employees

1 and an average monthly payroll of \$79,710. On June 17, 2020, loan proceeds were
2 disbursed as a cashier's check for \$199,276.03, which was deposited into Bank 4 account
3 ending in 9861 the same day.¹⁴

4 21. There is reason to believe that in the application for the loan in paragraph 20,
5 ABRAMOVS made the following misrepresentations:

6 a. ABRAMOVS stated that the EIN number for National Investment
7 Group is xx-xxx7848. However, that EIN number was established for an entity with a
8 different name on June 11, 2020, and is not associated with National Investment Group.
9 As of August 28, 2020, the IRS had received no filed tax returns for the EIN/TIN number
10 listed on the application.

11 b. ABRAMOVS falsely stated National Investment Group employed 41
12 people. A query to the DETR showed that DETR had no records of any payments for
13 unemployment insurance made by National Investment Group.

14 **Use of PPP Loan Proceeds**

15 22. As described below, ABRAMOVS used proceeds of the alleged scheme and
16 artifice to purchase luxury items for himself, including a 2020 Bentley, a 2020 Tesla, and
17 two condominiums located in Veer Towers in Las Vegas, Nevada.

18 23. Proceeds from the PPP loans were disbursed into various bank accounts, and
19 then the majority were transferred into an account at Bank 7 ending in 9732. This account
20 was opened on January 6, 2020 by ABRAMOVS in the name of NIGC, EIN xx-xxx7928.
21 The bank statements for the account are sent to NIGC dba National Legal Advisors.

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23 ¹⁴ On June 12, 2002, ABRAMOVS opened account 9861 in Las Vegas, Nevada, in the name
24 of National Investment Group, EIN xx-xxx7848. ABRAMOVS was the sole signer/owner
for the account. The address for the account was listed as the S. Fort Apache Road address.

1 ABRAMOVS is the sole signer for the account. Analysis of account activity was performed
2 by investigators to identify and trace fraud proceeds into and out of the account.

3 24. On January 6, 2020, ABRAMOVS also opened an account at Bank 7 ending
4 in 9740 in the name of NIGC, EIN xx-xxx7928. ABRAMOVS was the sole signer for the
5 account. Analysis of account activity was performed to identify and trace the fraud
6 proceeds into and out of the account.

7 2020 Bentley Continental GT

8 25. On June 3, 2020, ABRAMOVS purchased a a 2020 Bentley Continental GT
9 Convertible for \$240,190. The final purchase price of the vehicle was \$260,982.49 with
10 taxes and fees. ABRAMOVS paid for the vehicle, in large part, with funds from a June 1,
11 2020 wire transfer in the amount of \$251,024.21 from NIGC Bank 7 account 9732.
12 Analysis of this account revealed that this \$251,024.21 wire consisted solely of PPP loan
13 proceeds.

14 26. On June 26, 2020, the title for this Bentley was issued to Jorge E. Abramovs.
15 The vehicle was registered to ABRAMOVS at an address in Las Vegas, Nevada which was
16 owned by ABRAMOVS at the time.

17 2020 Tesla Model 3

18 27. On June 18, 2020 (although a few of the records reflect a June 17, 2020
19 purchase agreement date), ABRAMOVS purchased a 2020 Tesla Model 3 for \$45,289.92.
20 ABRAMOVS "traded in" a leased Tesla with an outstanding lease balance of \$69,985.08.
21 The trade-in was credited with a "trade-in value" of \$60,400, leaving a "net trade-in value"
22 of -\$9,585.08, which was added to the purchase price. The final cost of the purchase, after
23 taxes and the lease buy-out, was \$54,904.25. Tesla records show that a \$100 reservation
24 deposit, described as a "CC" payment, was received on May 30, 2020, and an "echeck" in

1 the amount of \$54,804.25 was received on June 18, 2020, completing the amount due of
2 \$54,904.25.

3 28. On June 29, 2020, an electronic withdrawal to Tesla was debited from the
4 Bank 7 account 9732 in the amount of \$54,804.25. Financial analysis found that
5 approximately 80% of this electronic withdrawal consisted of PPP loan funds.

6 29. On July 9, 2020, the title for the vehicle was issued to Jorge E. Abramovs
7 and is registered to ABRAMOVS at his former address in Las Vegas, Nevada, a property
8 owned by ABRAMOVS.

9 First Condominium Purchase at the Veer Towers

10 30. In May 2020, ABRAMOVS purchased a condominium at the Veer Towers
11 in Las Vegas, Nevada. Online records of the Clark County Recorder's Office show a deed
12 for this property recorded on May 29, 2020, granting ownership of the property to U.S.
13 Commercial Real Estate Investment Group (U.S. Commercial), a Nevada Limited
14 Liability Company (LLC), for \$225,000. Online records of the Nevada Secretary of State's
15 Office show that the registered name for U.S. Commercial is listed as U.S. Commercial
16 Real State [sic] Investment Group, LLC. That company is an active Nevada LLC formed
17 on May 19, 2020. The sole Managing Member of the company is ABRAMOVS.

18 31. Records obtained from Lawyers Title of Nevada ("Lawyers"), the escrow
19 agent for the purchase of this unit, show the property was purchased in the name of U.S.
20 Commercial Real Estate Investment Group for \$225,000. Lawyers records include a copy
21 of the Nevada Secretary of State's Office filing documents for U.S. Commercial Real State
22 [sic] Investment Group as noted above, although the Lawyers records for the purchase use
23 "Estate" rather than "State" throughout the escrow file. The records show a
24 deposit/earnest money payment of \$3,000 made on May 20, 2020. The Lawyers receipt

1 shows the payment received from National Legal Advisors by way of Bank 7 account 9732,
2 by check. The handwritten memo on the check was "Veer tower [unit number] – Jorge
3 Abramovs." Veer Towers is the name of the structure that houses the condominium.
4 After the addition of fees and expenses, the "Funds to Close" totaled \$222,638.59. Lawyers
5 records show that final payment received on May 29, 2020, via a wire transfer from NIGC
6 Bank 7 account 9732 in the amount of \$222,638.59.

7 32. Bank 7 account 9732 records show that on May 21, 2020, check # 2027
8 payable to Lawyers Title in the amount of \$3,000 cleared the account. Bank 7 account 9732
9 records show a wire debit to Lawyers Title of Nevada in the amount of \$222,638.59 on
10 May 29, 2020. Financial analysis found that of the \$225,638.59 spent to purchase this
11 condominium, approximately 80% constituted criminal proceeds from Abramov's PPP
12 loan fraud scheme.

13 Second Condominium Purchase at the Veer Towers

14 33. In June 2020, ABRAMOVS purchased a second condominium at the Veer
15 Towers in Las Vegas, Nevada. Online records of the Clark County Recorder's Office show
16 a deed recorded on June 10, 2020, granting ownership of the property to U.S. Commercial
17 Real Estate Investment Group (U.S. Commercial), a Nevada Limited Liability Company
18 (LLC), for \$412,000. Online records of the Nevada Secretary of State's Office show that the
19 registered name for U.S. Commercial is listed as U.S. Commercial Real State [sic]
20 Investment Group, LLC. That company is an active Nevada LLC formed on May 19,
21 2020. The sole Managing Member of the company is Jorge Abramovs.

22 34. Records obtained from Lawyers, the escrow agent for the purchase of this
23 unit, show the property was purchased in the name of U.S. Commercial Real Estate
24 Investment Group for \$412,000. Lawyers records include a copy of the Nevada Secretary

1 of State's Office filing documents for U.S. Commercial Real State [sic] Investment Group
2 as noted above, although the Lawyers records for the purchase use "Estate" rather than
3 "State" throughout the escrow file. The records show a deposit/earnest money payment of
4 \$10,000 made on June 2, 2020. The payment was from NIGC/NLA [Bank 7 account]
5 9732, by check. The handwritten memo on the check references the unit number for this
6 condominium. After the addition of fees and expenses, the "Funds to Close" totaled
7 \$403,906.29. Lawyers records show that final payment received on June 9, 2020, via a wire
8 transfer from NIGC Bank 7 account 9740 in the amount of \$403,906.29.

9 35. Financial analysis found that ABRAMOVS paid for this second
10 condominium with approximately \$9,699.29 in PPP loan fraud proceeds from Bank 7
11 account 9732 and approximately \$400,840.76 in PPP loan proceeds from Bank 7 account
12 9740, for a total of approximately \$410,540.05. In total, ABRAMOVS paid approximately
13 \$413,906.29 for the purchase of this second condominium. Of that \$410,540.05,
14 approximately 99%, constituted criminal proceeds from ABRAMOVS's PPP loan fraud
15 scheme.

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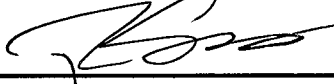
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1 **CONCLUSION**

2 36. Based upon the foregoing, there is probable cause to believe that
3 ABRAMOVS violated Title 18, United States Code, Section 1344(2) (Bank Fraud).

4 Respectfully submitted,

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6 Robert Scott, Special Agent
7 Federal Bureau of Investigation

8 Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
9 telephone on this 15th day of January, 2021.

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11
12 HONORABLE ELAYNA J. YOUCHAH
13 UNITED STATES MAGISTRATE JUDGE