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<div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 0 auto;"> <b>JAN 30 2024</b> </div>	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
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13 *Attorneys for the United States*

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 v.

18 POUPAK JANNISSAR,

19 Defendant.

**CRIMINAL INDICTMENT**

2:24-cr-00020-APG-DJA

**VIOLATIONS:**

Conspiracy to Commit Wire Fraud (18 U.S.C. § 1349)

Money Laundering (18 U.S.C. § 1956(a)(2)(B)(i))

**THE GRAND JURY CHARGES THAT:**

At times relevant to this indictment:

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**INTRODUCTORY ALLEGATIONS**

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1. Defendant **POUPAK JANNISSAR** was a Canadian national who, along with his co-conspirators, perpetrated a scheme to steal millions of dollars from thousands of victims in the United States while residing outside the reach of U.S. authorities in Quebec, Canada.

2. Defendant **POUPAK JANNISSAR** operated and controlled sham companies that used fake checks and other fraudulent debits to steal from his victims' accounts at banks and other financial institutions (collectively, "banks") in the United States. The defendant and his co-conspirators used various names for their sham companies, including but not limited to Computer Run, EBooks, Joreeb, Memo Storage, Our Online Backup, You Can Fax Too, and Your E-Library (collectively, the "Sham Companies").

3. The Sham Companies were incorporated in various states, including Nevada.

4. The Sham Companies pretended to sell various internet-based services for consumers, such as cloud storage, internet faxing, and online books. However, the Sham Companies did not actually provide any real product and service.

5. Instead, the Sham Companies served as a cover story for defendant **POUPAK JANNISSAR** and his co-conspirators to steal money from the bank accounts of victims in Nevada and across the United States.

**COUNT ONE**  
**Conspiracy to Commit Wire Fraud**  
**(18 U.S.C. § 1349)**

6. Paragraphs One through Five of this Indictment are hereby realleged and incorporated herein by reference.

7. Beginning on a date unknown, but no later than in or about January 2013 and continuing to at least in or about August 2023, in the District of Nevada and elsewhere,

**POUPAK JANNISSAR,**

1  
2 defendant, did knowingly and willfully combine, conspire, confederate, and agree with  
3 others known and unknown to the Grand Jury, to commit wire fraud, in violation of 18  
4 U.S.C. § 1343.

5 **The Object of the Conspiracy**

6 8. The object of the conspiracy was for defendant **POUPAK JANNISSAR** and  
7 his co-conspirators to enrich themselves by using fake checks and other fraudulent debits to  
8 steal money from bank accounts, transferring the proceeds of the fraud to accounts they  
9 controlled, and distributing the proceeds to themselves and others.

10 **The Manner and Means of the Conspiracy**

11 ***Defendant Obtained Victim Bank Account Information***

12 9. Defendant **POUPAK JANNISSAR**, together with others, bought lists  
13 containing misappropriated personal information about thousands of potential victims.  
14 These lists included the victims' names, addresses, and bank account information, including  
15 routing and account numbers. Some of the lists contained personal and bank account  
16 information for people who had applied for payday loans. **JANNISSAR** and his co-  
17 conspirators used the victims' stolen information to create fake checks and other fraudulent  
18 debits.

19 10. Defendant **POUPAK JANNISSAR**, together with others, caused other  
20 people to create the Sham Companies in the United States and open bank accounts for the  
21 Sham Companies. The Sham Companies provided the defendant and his co-conspirators  
22 with access to banks in the United States and provided a cover story to falsely justify the  
23 fake checks and other fraudulent debits from victim bank accounts.  
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*Defendant Repeatedly Stole From Bank Accounts*

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11. Defendant **POUPAK JANNISSAR**, together with others, used bank accounts for the Sham Companies to steal millions of dollars by fraudulently debiting thousands of victim bank accounts. The defendant and his co-conspirators also opened accounts with third-party payment processors in order to fraudulently debit victim bank accounts on behalf of the Sham Companies. To debit victim accounts, defendant **JANNISSAR**, together with others, falsely represented to banks and others that individual victims had authorized debits from their bank accounts.

12. Defendant **POUPAK JANNISSAR**, together with others, debited bank accounts multiple times if the individual victims did not notice and dispute the initial charges. **JANNISSAR** and his co-conspirators often switched the names of the Sham Companies that debited accounts. By stealing money from bank accounts, **JANNISSAR** victimized banks and individuals with accounts at the banks.

13. In March 2020, a scheme participant emailed defendant **POUPAK JANNISSAR** and a co-conspirator about how they were engaged in the “fraudulent collection of money via paid leads from unsuspecting American bank accounts” and how **JANNISSAR** was “fraudulently operating in Canada while stealing from Americans[.]” **JANNISSAR** forwarded both emails to another co-conspirator.

14. Some individual victims disputed the fraudulent charges with their banks. As part of the dispute process, banks and payment processors sometimes asked the Sham Companies to provide documentary proof that individuals had authorized the Sham Companies to debit their accounts. In response, defendant **POUPAK JANNISSAR**, together with others, created fake proofs of authorization to submit to banks and payments processors.

1 15. Some individual victims contacted the Sham Companies. Call-takers working  
2 for defendant **POUPAK JANNISSAR** and his co-conspirators falsely told victims that the  
3 debits were legitimate charges that resulted from people signing up for services.

4 *Defendant Funneled the Money to Canada*

5 16. Defendant **POUPAK JANNISSAR** and his co-conspirators caused money  
6 taken from victim bank accounts to be transferred to accounts in Canada controlled by  
7 **JANNISSAR** and a co-conspirator. Some of the proceeds were funneled to Canada through  
8 an account that **JANNISSAR** opened in Nevada.

9 17. Defendant **POUPAK JANNISSAR** and his co-conspirators used the proceeds  
10 of the fraud in various ways, including paying **JANNISSAR** and his family members and  
11 paying other members of the scheme.

12 18. Defendant **POUPAK JANNISSAR** provided an accountant in Canada with  
13 fake documents that falsely explained why the Canadian companies that received money  
14 from accounts in the United States and concealed that the money was proceeds of fraud  
15 from the Sham Companies.

16 All in violation of Title 18, United States Code, Section 1349.

17 **COUNT TWO**  
18 **Money Laundering**  
**(18 U.S.C. § 1956(a)(2)(B)(i))**

19 19. Paragraphs One through Eighteen of this Indictment are hereby realleged and  
20 incorporated herein by reference.

21 20. On or about March 8, 2021, in the District of Nevada and elsewhere,

22 **POUPAK JANNISSAR**

23 defendant, transported, transmitted, and transferred, and attempted to transport, transmit,  
24 and transfer, a monetary instrument and funds, namely \$7,500, from a place in the United

1 States to and through a place outside the United States, namely Canada, knowing that the  
2 monetary instruments and funds involved in the transportation, transmission, and transfer  
3 represented some form of unlawful activity and that such transportation, transmission, and  
4 transfer were designed in whole and in part to conceal and disguise the nature, the location,  
5 the source, the ownership, and the control of the proceeds of specified unlawful activity,  
6 namely wire fraud in violation of 18 U.S.C. § 1343.

7 All in violation of Title 18, United States Code, Sections 1956(a)(2)(B)(i) and 2.

8 **FORFEITURE ALLEGATION ONE**  
9 **Conspiracy to Commit Wire Fraud**

10 1. The allegations contained in Count One of this Criminal Indictment are  
11 hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture  
12 under 18 U.S.C. § 981(a)(1)(C) with 28 U.S.C. § 2461(c).

13 2. Upon conviction of the felony offense charged in Count One of this Criminal  
14 Indictment,

15 **POUPAK JANNISSAR,**

16 defendant herein, shall forfeit to the United States of America any property, real or  
17 personal, which constitutes or is derived from proceeds traceable to a violation of 18 U.S.C.  
18 § 1343, a specified unlawful activity as defined in 18 U.S.C. §§ 1956(c)(7)(A) and  
19 1961(1)(B), or 18 U.S.C. § 1349, conspiracy to commit such offense:

20 an in personam criminal forfeiture money judgment including, but not limited to, at  
21 least an amount to be calculated under the forfeiture statute in this forfeiture allegation and  
22 Fed. R. Crim. P. 32.2(b)(2)(C) (property).

23 3. If any of the property being subject to forfeiture under 18 U.S.C.  
24 § 981(a)(1)(C) with 28 U.S.C. § 2461(c), 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 party;
- 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 divided without difficulty;

it is the intent of the United States of America, under 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant for the property listed above.

All under 18 U.S.C. § 981(a)(1)(C) with 28 U.S.C. § 2461(c); 18 U.S.C. §§ 1343 and 1349; and 21 U.S.C. § 853(p).

**FORFEITURE ALLEGATION TWO**  
**Money Laundering**

1. The allegations contained in Count Two of this Criminal Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture under 18 U.S.C. § 981(a)(1)(A) with 28 U.S.C. § 2461(c); 18 U.S.C. § 981(a)(1)(C) with 28 U.S.C. § 2461(c); and 18 U.S.C. § 982(a)(1).

2. Upon conviction of the felony offense charged in Count Two of this Criminal Indictment,

**POUPAK JANNISSAR,**

defendant herein, shall forfeit to the United States of America, any property, real or personal, involved in a transaction or attempted transaction in violation of 18 U.S.C. § 1956(a)(2)(B)(i), or any property traceable to such property:

defendant herein, shall forfeit to the United States of America, any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of 18 U.S.C.

1 § 1956(a)(2)(B)(i), a specified unlawful activity as defined in 18 U.S.C. §§ 1956(c)(7)(A) and  
2 1961(1)(B), or a conspiracy to commit such offense:

3 defendant herein, shall forfeit to the United States of America, any property, real or  
4 personal, involved in a violation of 18 U.S.C. § 1956(a)(2)(B)(i), or any property traceable  
5 to such property:

6 an in personam criminal forfeiture money judgment including, but not limited to, at  
7 least \$7,500 (property).

8 3. If any property subject to forfeiture under 18 U.S.C. § 981(a)(1)(A) with 28  
9 U.S.C. § 2461(c); 18 U.S.C. § 981(a)(1)(C) with 28 U.S.C. § 2461(c); and 18 U.S.C. §  
10 982(a)(1), as a result of any act or omission of the defendant-

- 11 a. cannot be located upon the exercise of due diligence;
- 12 b. has been transferred or sold to, or deposited with, a third party;
- 13 c. has been placed beyond the jurisdiction of the court;
- 14 d. has been substantially diminished in value; or
- 15 e. has been commingled with other property which cannot be divided without  
16 difficulty;

17 it is the intent of the United States of America, under 21 U.S.C. § 853(p), to seek forfeiture  
18 of any other property of the defendant for the property listed above.

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1 All under 18 U.S.C. § 981(a)(1)(A) with 28 U.S.C. § 2461(c); 18 U.S.C. §  
2 981(a)(1)(C) with 28 U.S.C. § 2461(c); 18 U.S.C. § 982(a)(1); 18 U.S.C. § 1956(a)(2)(B)(i);  
3 and 21 U.S.C. § 853(p).

4 **DATED:** this 30th day of January, 2024

5 **A TRUE BILL:**

6

7

/S/  
FOREPERSON OF THE GRAND JURY

8

9 U.S. DEPARTMENT OF JUSTICE  
10 CONSUMER PROTECTION BRANCH  
11 AMANDA N. LISKAMM  
12 Director

U.S. ATTORNEY'S OFFICE  
FOR THE DISTRICT OF NEVADA  
JASON FRIERSON  
United States Attorney

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12 TIMOTHY FINLEY  
13 DANIEL ZYTNICK  
14 Senior Trial Attorneys  
15 U.S. Department of Justice  
16 Consumer Protection Branch

RICHARD ANTHONY LOPEZ  
Assistant United States Attorney

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**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**

BY:  INFORMATION  INDICTMENT

Matter Sealed:  Juvenile  Other than Juvenile  
 Pre-Indictment Plea  Superseding  Defendant Added  
 Indictment  Charges/Counts Added  
 Information

Name of District Court, and/or Judge/Magistrate Location (City)  
 UNITED STATES DISTRICT COURT Las Vegas  
 DISTRICT OF NEVADA Divisional Office

Name and Office of Person Furnishing Information on THIS FORM Ellenrose Jarmolowich  
 U.S. Atty  Other U.S. Agency  
 Phone No. (702) 388-6336

Name of Asst. U.S. Attorney (if assigned) TONY LOPEZ ~ DANIEL ZYTNICK

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)  
Christine Reins-Jarin ~ USPS

person is awaiting trial in another Federal or State Court (give name of court)

this person/proceeding transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

this is a reprosecution of charges previously dismissed which were dismissed on motion of:

U.S. Atty  Defense

SHOW DOCKET NO.

this prosecution relates to a pending case involving this same defendant. (Notice of Related Case must still be filed with the Clerk.)

MAG. JUDGE CASE NO.

prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

2:24-mj-0066-BNW

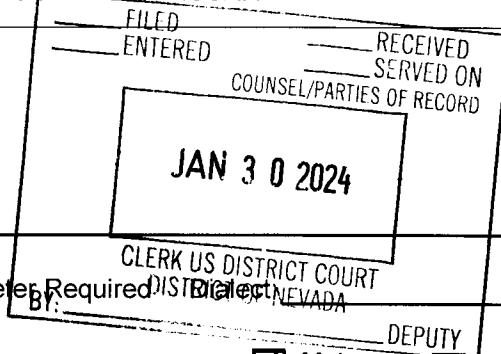
Place of offense \_\_\_\_\_ County \_\_\_\_\_

CASE NO. 2:24-cr-00020-APG-DJA

USA vs.

Defendant: POURAK JANNISSAR

Address: \_\_\_\_\_



Interpreter Required  Male  Alien  
 Birth Date \_\_\_\_\_  Female (if applicable)

Social Security Number \_\_\_\_\_

**DEFENDANT**

Issue:  Warrant  Summons

Location Status:

Arrest Date \_\_\_\_\_ or Date Transferred to Federal Custody \_\_\_\_\_

Currently in Federal Custody

Currently in State Custody

Writ Required

Currently on bond

Fugitive

Defense Counsel (if any): \_\_\_\_\_

FPD  CJA  RET'D

Appointed on Target Letter

This report amends AO 257 previously submitted

**OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS**

Total # of Counts 2

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Count(s)
	18 U.S.C. § 1349	Conspiracy to Commit Wire Fraud	1
	18 U.S.C. § 1956(a)(2)(B)(i)	Money Laundering	2