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11
12 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 vs.

16 JORGE ABRAMOVS,

17 Defendant.

CRIMINAL INDICTMENT

Case No.: 2:21-cr-27

VIOLATIONS:

18 U.S.C. § 1344(2) – Bank Fraud;

18 U.S.C. § 1014 – False Statement to a
Financial Institution; and

18 U.S.C. § 1957 – Monetary Transactions
in Criminally Derived Property.

FORFEITURE ALLEGATIONS

21
22
23 **THE GRAND JURY CHARGES THAT:**
24

Background Allegations

At all times relevant to the Indictment, unless otherwise stated:

1. Defendant JORGE ABRAMOVS (“ABRAMOVVS”) was a United States citizen, residing in Las Vegas, Nevada.

2. National Investment Group Corporation (“NIGC”) was a domestic corporation formed in the State of Nevada in 2018. Nevada Secretary of State records identified ABRAMOVS as the President, Secretary, Treasurer, and Director of NIGC until on or about October 14, 2020, when a different individual was identified as Secretary and Treasurer with ABRAMOVS still listed as President.

3. National Legal Advisors In Care Corp. (“NLA”) was a domestic corporation formed in the State of Nevada in 2019. Nevada Secretary of State records identified ABRAMOVS as the President, Secretary, Treasurer, and Director of NLA as of on or about July 1, 2019 through at least January 22, 2021. As discussed below, Abramovs submitted loan applications on behalf of NLA and entities with similar names.

4. Financial Institutions A through G (the “Financial Institutions”) were all financial institutions as defined by Title 18, United States Code, Section 20. Deposits at Financial Institutions A, B, D, E, F, and G were insured by the Federal Deposit Insurance Fund. Deposits at Financial Institution C were insured by the National Credit Union Share Insurance Fund.

5. ABRAMOVS controlled, and had sole signatory authority over, Financial Institution F account ending in 9757, Financial Institution F account ending in 9732, and Financial Institution F account ending in 9740, among other accounts.

Paycheck Protection Program

1
2 6. The Coronavirus Aid, Relief, and Economic Security (“CARES”) Act was a
3 federal law enacted in or around March 2020 and designed to provide emergency financial
4 assistance to the millions of Americans who are suffering the economic effects caused by
5 the COVID-19 pandemic. One source of relief provided by the CARES Act was the
6 authorization of up to \$349 billion in forgivable loans to small businesses for job retention
7 and certain other expenses, through a program referred to as the Paycheck Protection
8 Program (“PPP”).

9 7. In order to obtain a PPP loan, a qualifying business submitted a PPP loan
10 application, which was signed by an authorized representative of the business. The PPP
11 loan application required the business (through its authorized representative) to
12 acknowledge the program rules and make certain affirmative certifications in order to be
13 eligible to obtain the PPP loan. In the PPP loan application, the small business (through its
14 authorized representative) was required to state, among other things, its: (a) average
15 monthly payroll expenses; and (b) number of employees. These figures were used to
16 calculate the amount of money the small business was eligible to receive under the PPP. In
17 addition, businesses applying for a PPP loan were required to provide documentation
18 showing their payroll expenses.

19 8. A PPP loan application was processed by a participating lender, such as a
20 financial institution. If a PPP loan application was approved, the participating lender
21 funded the PPP loan using its own monies. While the lender issued the PPP loan, the
22 Small Business Administration (“SBA”) provided a guarantee to the lender for the PPP
23 loan. Data from the application, including information about the borrower, the total
24

1 amount of the loan, and the listed number of employees, was transmitted by the lender to
2 the SBA in the course of processing the loan.

3 9. PPP loan proceeds were required to be used by the business on certain
4 permissible expenses—payroll costs, interest on mortgages, rent, and utilities. The PPP
5 allowed the interest and principal on the PPP loan to be entirely forgiven if the business
6 spent the loan proceeds on these expense items within a designated period of time and used
7 a certain percentage of the PPP loan proceeds on payroll expenses.

8 The Scheme to Defraud

9 10. Beginning in or around April 2020 and continuing until at least in or around
10 June 2020, ABRAMOVS knowingly executed, and attempted to execute, a scheme and
11 artifice to obtain the money and property owned by, and under the custody and control of,
12 Financial Institutions, namely, Financial Institutions A-G, by means of materially false and
13 fraudulent pretenses, representations, and promises, as further described below.

14 Purpose of the Scheme to Defraud

15 11. It was the purpose of the scheme for ABRAMOVS to unjustly enrich himself
16 and others by fraudulently obtaining PPP loan proceeds.

17 Manner and Means of the Scheme to Defraud

18 12. It was part of the scheme that from on or about April 16, 2020 until at least
19 on about June 15, 2020, ABRAMOVS submitted at least six applications for PPP loans for
20 NIGC. On each loan application, ABRAMOVS provided an EIN, number of employees,
21 and average monthly payroll for NIGC.

22 13. It was further part of the scheme that between on or about May 10, 2020 and
23 on or about June 5, 2020, ABRAMOVS submitted at least five more applications for PPP
24 loans on behalf of NLA or an entity with a similar name, such as National Legal Advisors

1 or National Legal Advisors in Care (collectively, "the NLA entities"). ABRAMOVS signed
2 each of the loan applications as the authorized representative of the NLA entities. On each
3 loan application, ABRAMOVS provided an EIN, number of employees, and average
4 monthly payroll for the NLA entities.

5 14. On or about June 15, 2020, ABRAMOVS submitted a PPP loan application
6 to Financial Institution G using the entity name of National Investment Group.

7 ABRAMOVS signed the loan application as the authorized representative of National
8 Investment Group. On the loan application, ABRAMOVS provided an EIN, number of
9 employees and average monthly payroll for National Investment Group.

10 15. In order to qualify for the above loans, ABRAMOVS submitted materially
11 false information about NIGC and NLA, including the number of employees and average
12 monthly payroll of the businesses. At times, ABRAMOVS also submitted false and
13 fraudulent supporting documentation with the loan applications, including fraudulent tax
14 documents. ABRAMOVS falsely certified that the loan proceeds would be used retain
15 workers and maintain payroll or make mortgage interest payments, lease payments, and
16 utility payments, when in fact ABRAMOVS intended to use the funds for personal
17 expenses.

18 16. In addition, on each loan application, ABRAMOVS certified that during the
19 period beginning on or about February 15, 2020 and ending on or about December 1, 2020,
20 the Applicant had not and would not receive another loan under the PPP. Instead, contrary
21 to these certifications, ABRAMOVS received multiple loans in the name of NIGC and
22 multiple loans in the name of NLA.

23 17. It was part of the scheme that, in order to obtain multiple PPP loans for the
24 same company, ABRAMOVS and others known and unknown to the Grand Jury created

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