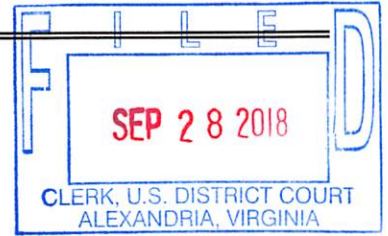


AO 91 (Rev. 11/11) Criminal Complaint

**UNDER SEAL**  
**UNITED STATES DISTRICT COURT**  
for the  
Eastern District of Virginia



United States of America  
v.

Case No. 1:18-MJ-464

ELENA ALEKSEEVNA KHUSYAYNOVA

*Defendant(s)*

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of the year 2014 until the present in the county of Alexandria in the Eastern District of Virginia, the defendant(s) violated:

*Code Section*

*Offense Description*

18 U.S.C. § 371

Conspiracy to defraud the United States

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet.

Reviewed by AUSA/SAUSA:

AUSA Jay Prabhu; SAUSA Alex Iftimie

*David Holt*  
*Complainant's signature*

David Holt, Special Agent, FBI

*Printed name and title*

Sworn to before me and signed in my presence.

Date: 28 Sep 18

City and state: Alexandria, Virginia

*Ivan D. Davis* /s/

Ivan D. Davis  
United States Magistrate Judge