

UNITED STATES DISTRICT COURT  
DISTRICT OF WYOMING

FILED  
U.S. DISTRICT COURT  
DISTRICT OF WYOMING  
2024 APR -9 AM 9:36  
MARGARET DOTKINS, CLERK  
CHEYENNE

UNITED STATES OF AMERICA,

Plaintiff,

v.

PAMELA KUBESH,

Defendant.

CRIMINAL COMPLAINT

Case Number: 24MJ-28-J

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

On or about April 8, 2024, in the District of Wyoming, the Defendant, **PAMELA KUBESH**, with the intent to defraud the United States, did utter and publish as true to WyHy Federal Credit Unit, a writing in the form of a check drawn upon the Treasury of the United States with a falsely made and forged endorsement, then well knowing said endorsement to be falsely made and forged, in violation of 18 U.S.C. §495.

I further state that I am a Special Agent with the U.S. Treasury Inspector General for Tax Administration and that this complaint is based on the following facts: *(See attached Sworn Statement)*

Continued on the attached sheet and made a part hereof.

*Bradley Peters*

Signature of Complainant  
Special Agent Bradley Peters

Sworn to before me and subscribed via telephone,

April 9, 2024

Date

at

Cheyenne, Wyoming

City and State

HON. KELLY H. RANKIN  
United States District Court Judge

Name & Title of Judicial Officer

*Kelly H. Rankin*  
Signature of Judicial Officer



**SWORN STATEMENT OF SPECIAL AGENT BRADLEY PETERS**

1. I am a Special Agent with the U.S. Treasury Inspector General for Tax Administration (TIGTA) and have been employed as such since July of 2023. I am currently assigned to the Denver Field Office. I am a graduate of the Criminal Investigator Training Program conducted at the Federal Law Enforcement Training Center in Glynco, GA. As part of my duties, I investigate criminal violations related to attempts to interfere with the tax administration duties of the Internal Revenue Service and external threats to IRS infrastructure and computer systems/computer intrusion. Prior to becoming a Special Agent with TIGTA, I worked for U.S. Housing and Urban Development, Office of Inspector General and the U.S. Department of the Treasury, Internal Revenue Service, Criminal Investigation as a Special Agent. I have a bachelor's degree in accounting.

2. The information contained herein is based on my personal observations, knowledge and training, as well as information related to me by other law enforcement officers and witnesses, as set forth more fully herein. The affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

3. On April 8, 2024, I received a call from an employee at WyHy Federal Credit Union who reported that on this same day a woman (later identified as PAMELA KUBESH) using the name represented by the initials N.J.R. entered WyHy Federal Credit Union at 1715 Stillwater Avenue, Cheyenne, WY 82009 and created an account in the name of N.J.R. As proof of identity to open the account, KUBESH presented a California driver's license in the name of N.J.R. bearing a photograph resembling KUBESH. KUBESH presented a U.S. Treasury check

made payable to a N.J.R. of Los Angeles, CA in the amount of \$985,020.00 and Serial Number ending 9452. I confirmed through IRS databases that a U.S. Treasury check with this Serial Number and amount was issued to N.J.R of Los Angeles, CA on March 26, 2024.

4. I was provided a copy of the U.S. Treasury check by Cheyenne Police. Based on my inspection, it appears that the full payee information listed on the original U.S. Treasury check was altered prior to presentment to WyHy Federal Credit Union. The check originally issued by the United States Treasury contained four lines of payee information. The altered checked presented to WyHy Federal Credit Union contained only three lines of payee information (the second line of the payee information was removed).

5. On April 8, 2024, Cheyenne Police officers responded to the WyHy Federal Credit Union and interviewed the woman purporting to be N.J.R. of California. Officers subsequently identified the woman as PAMELA KUBESH of Wisconsin. She was interviewed by police and admitted to endorsing the back of the check.

6. WyHy Federal Credit Union accepted the U.S. Treasury check presented by KUBESH and placed a hold on the check pending further inquiries.

**END OF SWORN STATEMENT**

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**PENALTY SUMMARY**

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**DEFENDANT NAME:** PAMELA KUBESH

**DATE:** April 9, 2024

**INTERPRETER NEEDED:** No

**VICTIM(S):** No

**OFFENSE/PENALTIES:** **18 U.S.C. §495**  
(Forgery Against the United States)  
  
0-10 Years  
Up to \$250,000 Fine  
3 Years Supervised Release  
\$100 Special Assessment

**AGENT:** Bradley Peters, TIGTA Special Agent

**AUSA:** Margaret M. Vierbuchen, Assistant United States Attorney

**ESTIMATED TIME OF TRIAL:** 1 to 5 days

**WILL THE GOVERNMENT SEEK DETENTION IN THIS CASE:** Yes

**ARE THERE DETAINERS FROM OTHER JURISDICTIONS:** No