

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

Criminal No.

v.

YAHOR ZALATAROU,
a/k/a "Egor Zolotorev,"
a/k/a "Yahor Zalupkin,"
a/k/a "Leader,"
ALIAKSANDR BOIKA,
a/k/a "Alexander Boiko,"
ALEXEI BUCHNEV,
a/k/a "Alex,"
TATSIANA SIENKO,
a/k/a "Tatiana Senko"
REGPAY CO, LTD,
a/k/a "Trust Bill," and
CONNECTIONS USA, INC.,
a/k/a "iServe.com"

Title 18, United States Code,
Sections 2251, 2252, 1956, 982
and 2

I N D I C T M E N T

The Grand Jury in and for the District of New Jersey,
sitting at Newark, charges:

COUNT ONE

(Conspiracy to Advertise Child Pornography)

1. At all times relevant to this Indictment:

a. Defendant REGPAY CO, LTD, a/k/a "Trustbill"
(hereinafter "Regpay"), located in Minsk, Belarus, was a credit
card processing company providing billing services for
individuals and/or companies selling memberships to websites over
the internet containing child pornography. Regpay also
maintained and operated websites containing child pornography and
a website advertising the sale of these and other websites.

b. Defendant YAHOR ZALATAROU, a/k/a "Egor

Zolotorev," a/k/a "Yahor Zalupkin," a/k/a "Leader" (hereafter "Zalatarou"), a resident of Belarus, was the president of Regpay, and controlled its operations.

c. Defendant ALIAKSANDR BOIKA, a/k/a "Alexander Boiko" (hereafter "Boika"), a resident of Belarus, was employed as Regpay's technical administrator.

The Conspiracy

2. From in or about June, 2002, through in or about August 1, 2003, in the District of New Jersey, and elsewhere, defendants,

YAHOR ZALATAROU, a/k/a "Egor Zolotorev," a/k/a "Yahor Zalupkin,"
a/k/a "Leader,"
ALIAKSANDR BOIKA, a/k/a "Alexander Boiko," and
REGPAY CO, LTD, a/k/a "Trust Bill"

did knowingly and wilfully conspire and agree with each other, and with others, to make, print and publish, and cause to be made, printed and published, any notice and advertisement seeking and offering to receive, exchange, buy, produce, display, distribute, and reproduce any visual depiction, the production of which visual depiction involved the use of a minor engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), and such visual depiction was of such conduct, and such notice and advertisement was transported in interstate and foreign commerce by computer, contrary to Title 18, United States Code, Section 2251(d)(1)(A).

The Object of the Conspiracy

3. The object of the conspiracy was to make available over the internet to individuals located in the United States and

throughout the world a website which advertised the sale of memberships to websites containing child pornography. Several of these websites were owned by the defendants.

The Manner and Means of the Conspiracy

4. It was part of the conspiracy that defendants YAHOR ZALATAROU, ALIAKSANDR BOIKA, REGPAY CO, LTD, and others, maintained a website, "www.redlagoon.com," (hereafter "Redlagoon") which advertised membership to websites containing child pornography. Specifically, a portion of the Redlagoon website displayed the following descriptions: 1)"REDLAGOON - Deepen into underground pedo world..."; and 2)"UNTIL THEY GROW UP ... GET CLOSER TO INNOCENT PASSION ... THE MOST POPULAR FORBIDDEN LOLITA SITES:." The website also contained advertisements for eleven other websites. These eleven sites were divided into a first set of five, below the title: "RedLagoon Studio Websites" and the remaining six, below the title "Friendly Websites." The five "RedLagoon Studio Websites" included www.darkfeeling.com, www.lust-gallery.com, www.lolittles.com, www.juventaclub.com, and www.veiledpages.com. Several of these websites contained child pornography.

5. It was a further part of the conspiracy that defendants YAHOR ZALATAROU, ALIAKSANDR BOIKA, REGPAY CO, LTD, and others, provided a rating and a description for each of the websites advertised on the Redlagoon website.

6. It was a further part of the conspiracy that defendants YAHOR ZALATAROU, ALIAKSANDR BOIKA, REGPAY CO, LTD, and

others, used the services of computer hosting companies located in the United States to maintain the Redlagoon website enabling individuals located in New Jersey, the United States and throughout the world to obtain access to the website over the internet.

7. It was a further part of the conspiracy that defendants YAHOR ZALATAROU, ALIAKSANDR BOIKA, REGPAY CO, LTD, and others, created and maintained a system whereby individuals accessing the Redlagoon website could access a free preview tour of the advertised websites by simply clicking on the advertisement for the website.

8. It was a further part of the conspiracy that defendants YAHOR ZALATAROU, ALIAKSANDR BOIKA, REGPAY CO, LTD, and others, maintained and operated the Redlagoon website remotely from Belarus and other locations outside of the United States.

In violation of Title 18, United States Code, Section 2251(e).

COUNT TWO

(Advertising the Sale of Child Pornography)

1. Paragraphs 1 and 3 through 8 of Count One are realleged and incorporated as if fully set forth herein.

2. From in or about June, 2002, through in or about August 1, 2003, in the District of New Jersey, and elsewhere, defendants,

YAHOR ZALATAROU, a/k/a "Egor Zolotorev," a/k/a "Yahor Zalupkin,"
a/k/a "Leader,"
ALIAKSANDR BOIKA, a/k/a "Alexander Boiko," and
REGPAY CO, LTD, a/k/a "Trust Bill"

did knowingly and wilfully make, print and publish, and cause to be made, printed and published, a notice and advertisement, specifically the internet website "www.redlagoon.com," seeking and offering to receive, exchange, buy, produce, display, distribute, and reproduce any visual depiction, the production of which visual depiction involved the use of a minor engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), and such visual depiction was of such conduct, and such notice and advertisement was transported in interstate and foreign commerce by computer.

In violation of Title 18, United States Code, Sections 2251(d)(1)(A) and 2.

COUNT THREE

(Conspiracy to Distribute Child Pornography)

1. Paragraphs 1 and 3 through 8 of Count One are realleged and incorporated as if fully set forth herein.

2. At all times relevant to this Indictment:

a. Defendant ALEXEI BUCHNEV, a/k/a "Alex" (hereafter "Buchnev"), a resident of Belarus, was employed by Regpay as the company's marketing director, liaison to countries where English is spoken, and translator.

b. Defendant TATSIANA SIENKO, a/k/a Tatiana Senko" (hereafter "Sienko"), a resident of Belarus, was employed by Regpay as the company's administrative and financial assistant.

The Conspiracy

3. From in or about June, 2002, through in or about August 1, 2003, in the District of New Jersey, and elsewhere, defendants,

YAHOR ZALATAROU, a/k/a "Egor Zolotorev," a/k/a "Yahor Zalupkin,"
a/k/a "Leader,"
ALIAKSANDR BOIKA, a/k/a "Alexander Boiko"
ALEXEI BUCHNEV, a/k/a "Alex,"
TATSIANA SIENKO, a/k/a "Tatiana Senko," and
REGPAY CO, LTD, a/k/a "Trust Bill"

did knowingly and wilfully conspire and agree with each other, and with others, to transport and ship in interstate commerce, by computer, visual depictions, the production of which involved the use of a minor engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), and such visual depictions were of such conduct, contrary to Title 18, United

States Code, Section 2252(a)(1).

The Object of the Conspiracy

4. The object of the conspiracy was to sell over the internet to individuals located in the United States and throughout the world memberships to websites containing child pornography. Several of these websites were owned by the defendants.

The Manner and Means of the Conspiracy

5. It was part of the conspiracy that defendants YAHOR ZALATAROU, ALIAKSANDR BOIKA, ALEXEI BUCHNEV, TATSIANA SIENKO, REGPAY CO, LTD and others, provided billing services for individuals and/or companies offering over the internet access to over fifty (50) websites containing child pornography. Access to each of these websites was available to individuals purchasing a membership to the site. In this manner the defendants obtained personal information from individuals located in New Jersey, the United States and throughout the world, seeking to purchase access to these websites with a credit card.

6. It was a further part of the conspiracy that after obtaining personal and credit card information from prospective customers, YAHOR ZALATAROU, ALIAKSANDR BOIKA, ALEXEI BUCHNEV, TATSIANA SIENKO, REGPAY CO, LTD and others, ran a series of internal checks on the credit card before approving the transaction. If a transaction was approved, the defendants sent the purchaser an e-mail containing among other information, a password and user name enabling the customer to access the

website containing child pornography for a specified period of time.

7. It was a further part of the conspiracy that defendants YAHOR ZALATAROU, ALIAKSANDR BOIKA, ALEXEI BUCHNEV, TATSIANA SIENKO, REGPAY CO, LTD and others, used the services of computer hosting companies located in the United States to maintain a database of transactional information regarding the above described purchases. These computers were also used to send the above described e-mail notices to individuals purchasing access to the websites containing child pornography.

8. It was a further part of the conspiracy that defendants YAHOR ZALATAROU, ALIAKSANDR BOIKA, REGPAY CO, LTD and others, maintained and operated at least four websites containing child pornography which were available over the internet to individuals located in New Jersey, the United States and throughout the world. These websites included www.darkfeeling.com, www.lust-gallery.com, www.lolittles.com, and www.veiledpages.com (hereafter the "Regpay websites").

9. It was a further part of the conspiracy that defendants YAHOR ZALATAROU, ALIAKSANDR BOIKA, REGPAY CO, LTD and others, used the services of computer hosting companies located in the United States to maintain the Regpay websites enabling individuals throughout New Jersey, the United States and foreign countries to obtain access to them over the internet.

10. It was a further part of the conspiracy that defendants YAHOR ZALATAROU, ALIAKSANDR BOIKA, REGPAY CO, LTD and

others, maintained and operated the Regpay websites remotely from Belarus and other locations outside of the United States.

11. It was a further part of the conspiracy that defendants YAHOR ZALATAROU, ALIAKSANDR BOIKA, ALEXEI BUCHNEV, TATSIANA SIENKO, REGPAY CO, LTD and others, processed approximately \$3,000,000 in credit card transactions for the sale of memberships to websites containing child pornography. Approximately \$50,197 of this amount was obtained from individuals located in New Jersey.

In violation of Title 18, United States Code, Section 2252(b)(1).

COUNTS FOUR THROUGH EIGHT

(Distribution of Child Pornography)

1. Paragraphs 1 and 3 through 8 of Count One, and paragraphs 3 through 11 of Count Three, are realleged and incorporated as if fully set forth herein.

2. From in or about June, 2002, through in or about August 1, 2003, in the District of New Jersey, and elsewhere, defendants,

YAHOR ZALATAROU, a/k/a "Egor Zolotorev," a/k/a "Yahor Zalupkin,"
a/k/a "Leader,"
ALIAKSANDR BOIKA, a/k/a "Alexander Boiko," and
REGPAY CO, LTD

did knowingly and wilfully transport and ship in interstate commerce, by computer, to individuals in New Jersey, as set forth below, visual depictions, specifically the websites listed below, the production of which involved the use of a minor engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), and such visual depictions were of such conduct.

Count	Website Title	Number of NJ Transactions
Four	www.darkfeeling.com	84
Five	www.lustgallery.com	74
Six	www.lolittles.com	53
Seven	www.veiledpages.com	96
Eight	www.onlinesharing community.com	36

In violation of Title 18, United States Code, Sections 2252(a)(1) and 2.

COUNT NINE

**(Money Laundering Conspiracy - Proceeds
of Child Pornography Scheme)**

1. Paragraphs 1 and 3 through 8 of Count One, and paragraphs 2 and 4 through 11 of Count Three, are realleged and incorporated as if fully set forth herein.

2. At all times relevant to this Indictment, defendant CONNECTIONS USA, INC., a/k/a "iServe.com" (hereafter "Connections"), located in Ft. Lauderdale, Florida, was a credit card processing company providing internet billing service to Regpay.

3. As used in this Indictment, "financial transaction" has the meaning set forth in Title 18, United States Code, Section 1956(c)(4).

The Conspiracy

4. From in or about June, 2002, through in or about August 1, 2003, in the District of New Jersey, and elsewhere, defendants,

YAHOR ZALATAROU, a/k/a "Egor Zolotorev," a/k/a "Yahor Zalupkin,"
a/k/a "Leader,"
ALIAKSANDR BOIKA, a/k/a "Alexander Boiko"
ALEXEI BUCHNEV, a/k/a "Alex,"
TATSIANA SIENKO, a/k/a "Tatiana Senko"
REGPAY CO, LTD, a/k/a "Trust Bill," and
CONNECTIONS USA INC., a/k/a "iServe"

did knowingly and wilfully conspire and agree with each other, and with others, to transport, transmit, and transfer a monetary instrument and funds from a place in the United States to and through a place outside the United States, namely, Latvia, with

the intent to promote the carrying on of a specified unlawful activity, namely, the transportation and shipment in interstate commerce by computer of visual depictions which involved the use of a minor engaging in sexually explicit conduct, as defined in Title 18, United States Code Section 2256(2), and are of such conduct, as alleged in Counts Three through Eight, and knowing that the monetary instrument and funds involved in the transportation, transmission and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission and transfer was designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of the specified unlawful activity, as described above, contrary to Title 18, United States Code, Sections 1956(a)(2)(A) and (B)(i).

The Object of the Conspiracy

5. The object of the conspiracy was to engage in financial transactions with the proceeds of the scheme to distribute child pornography in order to promote the continued operation of this offense and to conceal the identity of the defendants and others receiving funds for their role in this activity.

The Manner and Means of the Conspiracy

6. It was a part of the conspiracy that defendants YAHOR ZALATAROU, ALIAKSANDR BOIKA, ALEXEI BUCHNEV, TATSIANA SIENKO, and REGPAY CO, LTD obtained the services of defendant CONNECTIONS USA, INC., in order to process credit card

transactions for the sale of memberships to websites containing child pornography as described in Counts Three through Eight. In this manner, defendants were able to conceal their involvement in these transactions from the major credit card associations. Defendant Connections received a commission in excess of eleven percent of the funds received from the scheme.

7. It was a further part of the conspiracy that defendant CONNECTIONS USA, INC. used the services of another company having approval from the major credit card associations to conduct financial transactions with their credit cards in order to process the above described credit card transactions. In this manner the defendants were able to receive payments from individuals located in New Jersey, the United States and throughout the world for the purchase of memberships to websites containing child pornography. Defendant Connections misrepresented to this company the true source of the funds being processed.

8. It was a further part of the conspiracy that after a customer used a credit card to purchase a membership in a website containing child pornography as described in Counts Three through Eight, the funds obtained from the transaction were deposited into a money market account maintained by defendant CONNECTIONS USA, INC., in the United States.

9. It was a further part of the conspiracy that after receiving the funds from the purchases of child pornography and taking their fee, defendant CONNECTIONS USA, INC., transferred by

wire the proceeds from the scheme described in Counts Three through Eight to a bank account maintained at "A" Bank in Riga, Latvia as directed by defendants YAHOR ZALATAROU, ALIAKSANDR BOIKA, ALEXEI BUCHNEV, TATSIANA SIENKO, and REGPAY CO, LTD. From in or about June 2002, through in or about June 2003, approximately 29 wire transfers to Latvia, each in amounts greater than \$10,000, were sent totaling approximately \$3,000,000. Each of these transfers was made through a correspondent bank account maintained by "A" Bank at "D" Bank. These transactions enabled the continued operation of the scheme described in Counts Three through Eight.

In violation of Title 18, United States Code, Section 1956(h).

COUNT TEN

(Money Laundering Conspiracy - Transactions in Excess of \$10,000)

1. Paragraphs 1 and 3 through 8 of Count One, paragraphs 2 and 4 through 11 of Count Three, and paragraphs 2, 3 and 5 through 9 of Count Nine are realleged and incorporated as if fully set forth herein.

2. "D" Bank was a federally insured financial institution with various branch offices operating throughout the United States.

The Conspiracy

3. From in or about June, 2002, through in or about August 1, 2003, in the District of New Jersey, and elsewhere, defendants,

YAHOR ZALATAROU, a/k/a "Egor Zolotorev," a/k/a "Yahor Zalupkin,"
a/k/a "Leader,"
ALIAKSANDR BOIKA, a/k/a "Alexander Boiko"
ALEXEI BUCHNEV, a/k/a "Alex,"
TATSIANA SIENKO, a/k/a "Tatiana Senko"
REGPAY CO, LTD, a/k/a "Trust Bill," and
CONNECTIONS USA INC., a/k/a "iServe.com"

did knowingly and wilfully conspire and agree with each other, and with others, to engage in monetary transactions in criminally derived property of a value greater than \$10,000 which was derived from a specified unlawful activity, namely, the transportation and shipment in interstate commerce by computer of visual depictions which involved the use of a minor engaging in sexually explicit conduct and are of such conduct, as defined in Title 18, United States Code, Section 2256(2), as alleged in

Count Two, contrary to Title 18, United States Code, Section 1957.

In violation of Title 18, United States Code, Section 1956(h).

FORFEITURE ALLEGATION

1. The allegations in Counts Nine and Ten of this Indictment are realleged and incorporated by reference.

2. Pursuant to Title 18, United States Code, Section 982(a)(1), each defendant who is convicted of the offenses set forth in Counts Nine and Ten of this Indictment shall forfeit to the United States the following property:

a. All right, title, and interest in any and all property involved in each offense in violation of Title 18, United States Code, Section 1956 (h), for which the defendant is convicted, and all property traceable to such property, including the following:

i. all money or other property that was the subject of each transaction, transportation, transmission, and transfer in violation of Section 1956;

ii. all commission, fees and other property constituting proceeds obtained as a result of those violations; and

iii. all property used in any manner and part to commit and to facilitate the commission of those violations, including but not limited to all rights and interest in the internet domain name "regpay.com" and all other domain names registered to or controlled by the defendants and used to commit the offenses in Counts Three through Eight.

b. A money judgment equal to the total amount of money involved in the offenses set forth in Counts Nine and Ten

for which each defendant is convicted. If more than one defendant is convicted of the conspiracy, the defendants so convicted are jointly and severally liable for the amount involved in the conspiracy.

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), each defendant shall forfeit substitute property, up to the value of the amount described in paragraph 2, if, by any act and omission of either defendant, the property described in paragraph 2, or any portion thereof:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred, 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.

All in accordance with Title 18, United States Code,

Section 982 (a) (1), and Rule 32.2 (a), Federal Rules of Criminal Procedure.

A TRUE BILL,

FOREPERSON

CHRISTOPHER J. CHRISTIE
United States Attorney

