

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

BORIS RUBIZHEVSKY,

Defendant

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CRIMINAL NO. _____

**(Money Laundering Conspiracy,
18 U.S.C. § 1956(h))**

**INFORMATION AS TO
DEFENDANT BORIS RUBIZHEVSKY**

COUNT ONE

The United States Attorney for the District of Maryland charges:

Introduction

At all times material to this Information:

1. JSC Techsnabexport (“TENEX”) supplied uranium and uranium enrichment services to nuclear power companies throughout the world on behalf of the Russian Federation. TENEX was indirectly owned and controlled by, and performed functions of, the government of the Russian Federation.

2. TENEX established a wholly-owned subsidiary company located in the United States in or about October 2010, TENAM Corporation (“TENAM”). TENAM was TENEX’s official representative office in the United States. TENAM was indirectly owned and controlled by, and performed functions of, the government of the Russian Federation.

3. “Foreign Official 1,” a national of the Russian Federation, was a Director of TENEX from at least 2004 through in or about October 2010, and was the President of TENAM from in or about October 2010 through in or about October 2014. From in or about December 2011 through in or about October 2014, Foreign Official 1 was a resident of Maryland.

4. “Cylinder Corporation” was a company, based in Ohio, which engaged in the manufacture of tanks and vessels for the oil and gas, nuclear, and marine markets. Cylinder Corporation secured contracts with TENEX to supply storage and transportation cylinders. In or about September 2012, Cylinder Corporation was acquired by another company headquartered in Ohio.

5. “Executive A” was an officer of Cylinder Corporation.

6. The defendant, **BORIS RUBIZHEVSKY (“RUBIZHEVSKY”)**, was a citizen of the United States and resident of New Jersey, and was the owner and sole employee of NexGen Security Corporation (“NexGen”). NexGen and RUBIZHEVSKY purportedly performed consulting services on behalf of Cylinder Corporation.

The Conspiracy

7. Beginning in or about October 2011 and continuing through in or about March 2013, in the District of Maryland and elsewhere, the defendant,

BORIS RUBIZHEVSKY,

did willfully and knowingly combine, conspire, confederate and agree with Executive A, Foreign Official 1, and others known and unknown to conduct and attempt to conduct financial transactions affecting interstate commerce that involved the proceeds of specified unlawful activities - namely, violations of the wire fraud statutes and conspiracy to commit wire fraud, Title 18, United States Code, Sections 1343, 1346 and 1349 - knowing that the funds involved in the financial transactions represented the proceeds of some form of unlawful activity, and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activities, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

Manner and Means of the Conspiracy

The manner and means by which defendant **RUBIZHEVSKY** and his co-conspirators sought to accomplish the objects of the conspiracy included, among other things, the following:

8. It was part of the conspiracy that Cylinder Corporation agreed to make payments at the direction of, and for the benefit of, Foreign Official 1 in order to secure business with TENEX.

9. It was further part of the conspiracy that defendant **RUBIZHEVSKY** agreed with Foreign Official 1 and Executive A to use NexGen as an intermediary for the payments that Cylinder Corporation made at the direction of, and for the benefit of, Foreign Official 1 in order to conceal the nature, location, source, ownership, and control of the funds.

10. It was further part of the conspiracy that defendant **RUBIZHEVSKY** and Foreign Official 1 discussed aspects of the scheme in person, including in Maryland, and through, among other means, electronic mail.

11. It was further part of the conspiracy that defendant **RUBIZHEVSKY**, Foreign Official 1, and Executive A agreed that NexGen would enter into a sham consulting agreement with Cylinder Corporation in order to conceal the true nature of the transactions between Cylinder Corporation and NexGen.

12. It was further part of the conspiracy that defendant **RUBIZHEVSKY** and Foreign Official 1 agreed that NexGen would enter into a sham consulting agreement with a company based in the United Kingdom in order to conceal the true nature of the transactions defendant **RUBIZHEVSKY** made at the direction of, and for the benefit of, Foreign Official 1.

13. It was further part of the conspiracy that defendant **RUBIZHEVSKY** received checks from Cylinder Corporation and deposited those checks into the NexGen bank account.

14. It was further part of the conspiracy that defendant **RUBIZHEVSKY** provided

Foreign Official 1 with access to money out of a bank account defendant **RUBIZHEVSKY** controlled in Switzerland.

15. It was further part of the conspiracy that defendant **RUBIZHEVSKY** transferred certain monies via wire from the NexGen bank account into a bank account in Latvia at the direction of, and for the benefit of, Foreign Official 1.

18 U.S.C. § 1956(h)

Rod J. Rosenstein
United States Attorney

Date