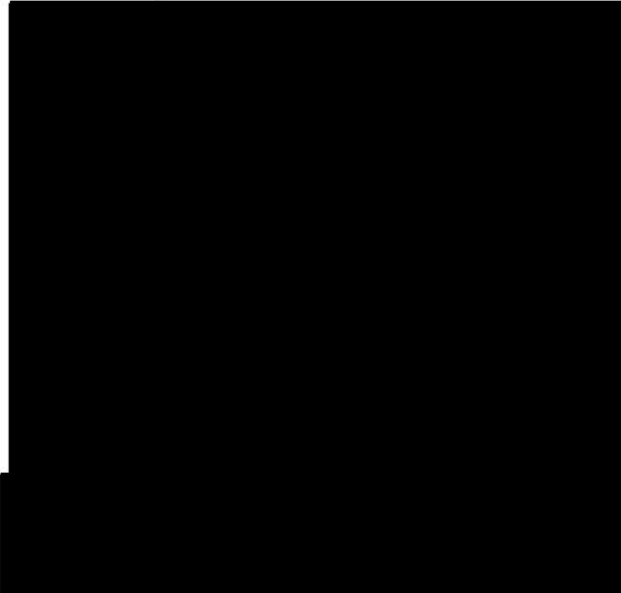


MEG:CWM/JSY/NJM
F. #2019R00980

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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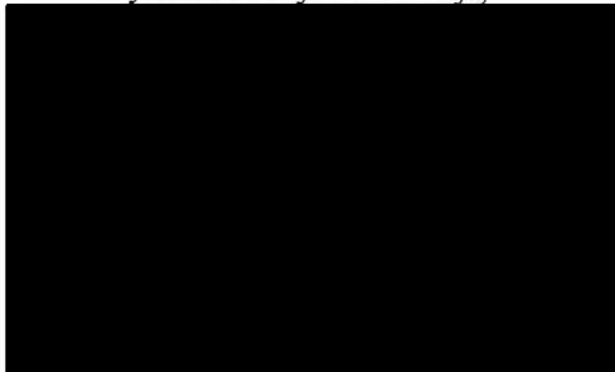


RUSLAN ALBERTOVICH NURULLIN,
also known as "ray.nolan" and
"nolan,"

ALEKSANDR POPAN,
also known as "exemption," "popanus,"
"Alexander Popan," "Alexandr Popan"
and "Alexander Popandopulo,"



NIKOLAJ SOFINSKIJ,
also known as "paganini,"
"Nikola Sofinskiy" and
"Mykola Petrovych Sofinskyi,"




FILED
IN CLERK'S OFFICE
US DISTRICT COURT E.D.N.Y.
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BROOKLYN OFFICE

INDICTMENT

Cr. No. **CR 19-456**
(T. 18, U.S.C., §§ 981(a)(1)(C),
982(a)(1), 982(b)(1), 1028A(a)(1),
1028A(b), 1028A(c)(5), 1341, 1343,
1349, 1956(h), 3559(g)(1), 2 and 3551
et seq.; T. 21, U.S.C., § 853(p); T. 28,
U.S.C., § 2461(c))

WEINSTEIN, J.

SCANLON, M.J.



Defendants.

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THE GRAND JURY CHARGES:

INTRODUCTION

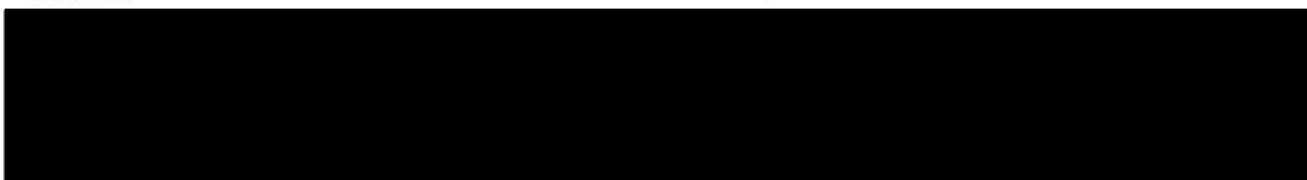
At all times relevant to this Indictment, unless otherwise indicated:

I. The Defendants



6. The defendant RUSLAN ALBERTOVICH NURULLIN, also known as “ray.nolan” and “nolan,” resided in Russia.

7. The defendant ALEKSANDR POPAN, also known as “exemption,” “poparius,” “Alexander Popan,” “Alexandr Popan” and “Alexander Popandopulo,” resided in Russia.



9. The defendant NIKOLAJ SOFINSKIJ, also known as “paganini,” “Nikola Sofinskiy” and “Mykola Petrovych Sofynskiy,” resided in Russia and Ukraine.



II. The Fraudulent Reshipping Schemes

14. From approximately 2013 to 2018, individuals located primarily in Russia, other member countries of the Commonwealth of Independent States (“CIS”) and countries in Eastern Europe operated related schemes to defraud merchants, financial institutions and individual victims in the United States (the “Fraudulent Reshipping Schemes”). Participants in the Fraudulent Reshipping Schemes used victims’ personally identifiable information (“PII”), including names, addresses, dates of birth, social security numbers, credit and debit card numbers and expiration dates, online payment account

numbers and other data. The PII was stolen or otherwise fraudulently obtained, or was used without authorization. Participants in the Fraudulent Reshipping Schemes obtained the PII by, among other things, gaining unauthorized access to protected computers, fraudulently inducing victims to surrender private information and purchasing stolen PII on black-market websites. Participants in the Fraudulent Reshipping Schemes used PII to purchase merchandise, including smartphones, computers, luxury clothing and handbags, from online retailers in the United States (the "Online Retailers").

15. Due, in part, to the high rate of fraudulent transactions emanating from Russia, other CIS countries and countries in Eastern Europe, many Online Retailers did not ship merchandise directly to those countries. Accordingly, participants in the Fraudulent Reshipping Schemes recruited individuals, to whom they referred as "Drops," in the United States to receive the fraudulently obtained merchandise from Online Retailers and then inspect, repackage and reship it to addresses associated with members of the schemes in the United States and overseas. Participants in the Fraudulent Reshipping Schemes often recruited Drops by falsely leading Drops to believe that they had been hired by "work-from-home" companies. In general, the fraudulently obtained merchandise was ultimately shipped to Russia, other CIS countries and Eastern Europe.

16. Once the fraudulently obtained merchandise reached its final destination, participants in the Fraudulent Reshipping Schemes sold the merchandise for a profit, dividing the profits among members of the schemes. The Fraudulent Reshipping Schemes were compartmentalized and each member performed a discrete role, as described below.

17. To protect their identities, participants in the Fraudulent Reshipping Schemes frequently arranged payment using a virtual currency exchange based in Russia. Participants in the Fraudulent Reshipping Schemes and their coconspirators used the schemes, in part, to launder the proceeds of crimes, including access device fraud, in violation of Title 18, United States Code, Section 1029(a)(5); mail fraud, in violation of Title 18, United States Code, Section 1341; wire fraud, in violation of Title 18, United States Code, Section 1343; and conspiracy to commit mail fraud and wire fraud, in violation of Title 18, United States Code, Section 1349 (collectively, the "Specified Unlawful Activities"). Participants in the Fraudulent Reshipping Schemes reinvested proceeds of the Specified Unlawful Activities to facilitate their ongoing schemes, including by purchasing prepaid mailing labels to facilitate the Drops' shipments.

18. It was part of each of the Fraudulent Reshipping Schemes that the defendants and their associates caused the fraudulently obtained merchandise to be mailed to Drops at locations in the Eastern District of New York and elsewhere. The defendants also caused the Drops to mail the fraudulently obtained merchandise overseas or to freight forwarding businesses in the United States that would consolidate it with other fraudulent purchases and ship the items overseas ("Consolidators"), and caused the Consolidators to ship the fraudulently obtained merchandise to addresses in Russia, among other locations. It was further part of the Fraudulent Reshipping Schemes that certain defendants sent and received payments through online money exchangers and e-currencies, in order to conceal their identities.

19. Depending on the circumstances, various victims bore the losses for the merchandise fraudulently purchased with PII, including debit card holders, credit card holders, debit card issuers, credit card issuers and Online Retailers.

20. Collectively, the defendants and their associates caused losses to debit cardholders, credit cardholders, debit card issuers, credit card issuers and Online Retailers (collectively, the "Fraud Victims") of more than \$48,000,000 through the Fraudulent Reshipping Schemes.

III. Roles in the Fraudulent Reshipping Schemes

21. "Stuffers": Participants in the Fraudulent Reshipping Schemes known as Stuffers purchased merchandise from Online Retailers fraudulently using other individuals' PII without authorization. The merchandise was essentially free to the Stuffer, minus the cost of obtaining PII. Stuffers often obtained PII from other individuals, who obtained it through computer intrusions and by other means. To avoid detection by Online Retailers, Stuffers often used Internet Protocol ("IP") addresses in the same approximate geographic location as the true cardholders and/or delivery addresses to conduct the fraudulent transactions. Many Online Retailers used algorithms to identify and filter out fraudulent purchases based on the location of the recipient of an online purchase and information about the method of payment. For example, Online Retailers often compared a credit card's number, which identified the issuing bank and its location, to the location of the card's user. If the location of the issuing bank and the location of the user were different, Online Retailers often blocked the purchase. To evade these safeguards, Stuffers often procured PII based on the region where the related credit or debit card was issued or where

the true card-owner lived. Stuffers would then use that PII to purchase and ship merchandise to Drops in the same approximate geographic locations as the true card-owner.

22. “Drop Managers”: Drop Managers (also known as “Drop Project Managers”) recruited Drops to receive and reship the fraudulently obtained merchandise. The term “Drop” was used to refer to the individual to whom the fraudulently obtained merchandise would be delivered. To identify new Drops, Drop Managers created fake work-from-home companies, which they used to hire U.S.-based workers under the guise of legitimate employment. Drop Managers posted ads for seemingly legitimate jobs such as “Logistics Clerk” or “Shipping Clerk” on job search websites. Drop Managers created professional-looking websites for the fake work-from-home companies. These websites, designed to resemble those of legitimate package handling companies, falsely caused the Drops to believe that they had been hired to work for legitimate businesses. Drop Managers usually promised to pay the Drops approximately \$2,000 to \$2,500 per month. Drop Managers generally instructed the Drops that they were responsible for receiving packages, checking the merchandise inside, and relabeling and reshipping the packages to specified addresses. Drop Managers often used Drops for approximately one to three months, after which the Drop Managers usually abandoned the Drops by not paying them and ceasing further communication. Frequently, in addition to not being paid for their work, Drops were re-victimized. During the work-from-home application process, Drop Managers required Drops to provide their PII, ostensibly to receive their salaries, but the Drop Managers then used the Drops’ PII without their knowledge or authorization to make fraudulent purchases.

23. “Buyers”: The ultimate recipients of the fraudulently obtained merchandise were referred to as “Buyers” or “Fences.” Buyers set the price they were

willing to pay for fraudulently obtained merchandise, typically based on a percentage of the merchandise's lowest fair market value. A Stuffer then purchased the merchandise online and entered the delivery address of a Drop provided by a Drop Manager. The Drop received and reshipped the merchandise directly overseas or to a Consolidator. After receiving the merchandise overseas, the Buyer sold it for a profit. The Buyer paid the Drop Manager the agreed-upon percentage of the merchandise's lowest fair market value, and the Drop Manager generally split his or her proceeds with the Stuffer.

24. "Admin Panel" or "Panel": The Drop Manager set up and managed a website, also referred to as an "Admin Panel," "Panel" or "Drop Project," which connected the participants in a specific Fraudulent Reshipping Scheme. Admin Panels consisted of logistics management software and databases, which facilitated the scheme. The Admin Panels also typically included private message boards on which Drop Managers, Stuffers and Buyers could negotiate and coordinate with each other in furtherance of the scheme. Drop Managers made Drops available to Stuffers, for the purpose of receiving shipments, by giving the Stuffers access to the Drops' names and addresses on the Admin Panel. Stuffers then selected which Drops would receive shipments of fraudulently purchased goods, and entered information about the shipments to each Drop into the Admin Panel, including tracking numbers, the contents of the packages and the value of the purchased goods.

IV. The Defendants' Admin Panels

25. Each Admin Panel functioned as a discrete website designed to enrich its users through their participation in a Fraudulent Reshipping Scheme. Among the Admin Panels operated by the defendants were the following:

[REDACTED]

B. Strongbox.cc

27. Strongbox.cc was an Admin Panel set up by a conspirator whose online persona is known to the Grand Jury. As part of a Fraudulent Reshipping Scheme pertaining to this Panel, the defendants [REDACTED]

[REDACTED] worked as Buyers, and the

defendants [REDACTED]

[REDACTED] RUSLAN ALBERTOVICH NURULLIN, also known as "ray.nolan" and "Nolan," and NIKOLAJ SOFINSKIJ, also known as "paganini," "Nikola Sofinskiy" and "Mykola Petrovych Sofinskyi," together with others, worked as Stuffers.

C. Arenaproject.it

28. Arenaproject.it was an Admin Panel set up by a conspirator whose online persona is known to the Grand Jury. As part of a Fraudulent Reshipping Scheme pertaining to this Panel, the defendants [REDACTED]

[REDACTED]

[REDACTED] worked as Buyers, and the defendants [REDACTED]

[REDACTED]

[REDACTED] RUSLAN ALBERTOVICH NURULLIN, also known as "ray.nolan" and "nolan," NIKOLAJ SOFINSKIJ, also known as "paganini," "Nikola Sofinskiy" and "Mykola Petrovych Sofinskyi," [REDACTED]

[REDACTED]

[REDACTED] together with others, worked as Stuffers.

D. Astra Star Ave

29. Astra Star Ave was an Admin Panel set up by a conspirator whose online persona is known to the Grand Jury. As part of a Fraudulent Reshipping Scheme pertaining to this Panel, the defendants [REDACTED]

[REDACTED]

[REDACTED] together with others, worked as Buyers, and the defendants [REDACTED]

[REDACTED]

RUSLAN

ALBERTOVICH NURULLIN, also known as "ray.nolan" and "nolan," NIKOLAJ SOFINSKIJ, also known as "paganini," "Nikola Sofinskiy" and "Mykola Petrovych Sofinskyi," [REDACTED]

[REDACTED]

[REDACTED] worked as Stuffers.

[REDACTED]

[REDACTED]

H. USS-Design

33. USS-Design was an Admin Panel set up by the defendant ALEKSANDR POPAN, also known as “exemption,” “popanus,” “Alexander Popan,” “Alexandr Popan” and “Alexander Popandopulo.” As part of a Fraudulent Reshipping

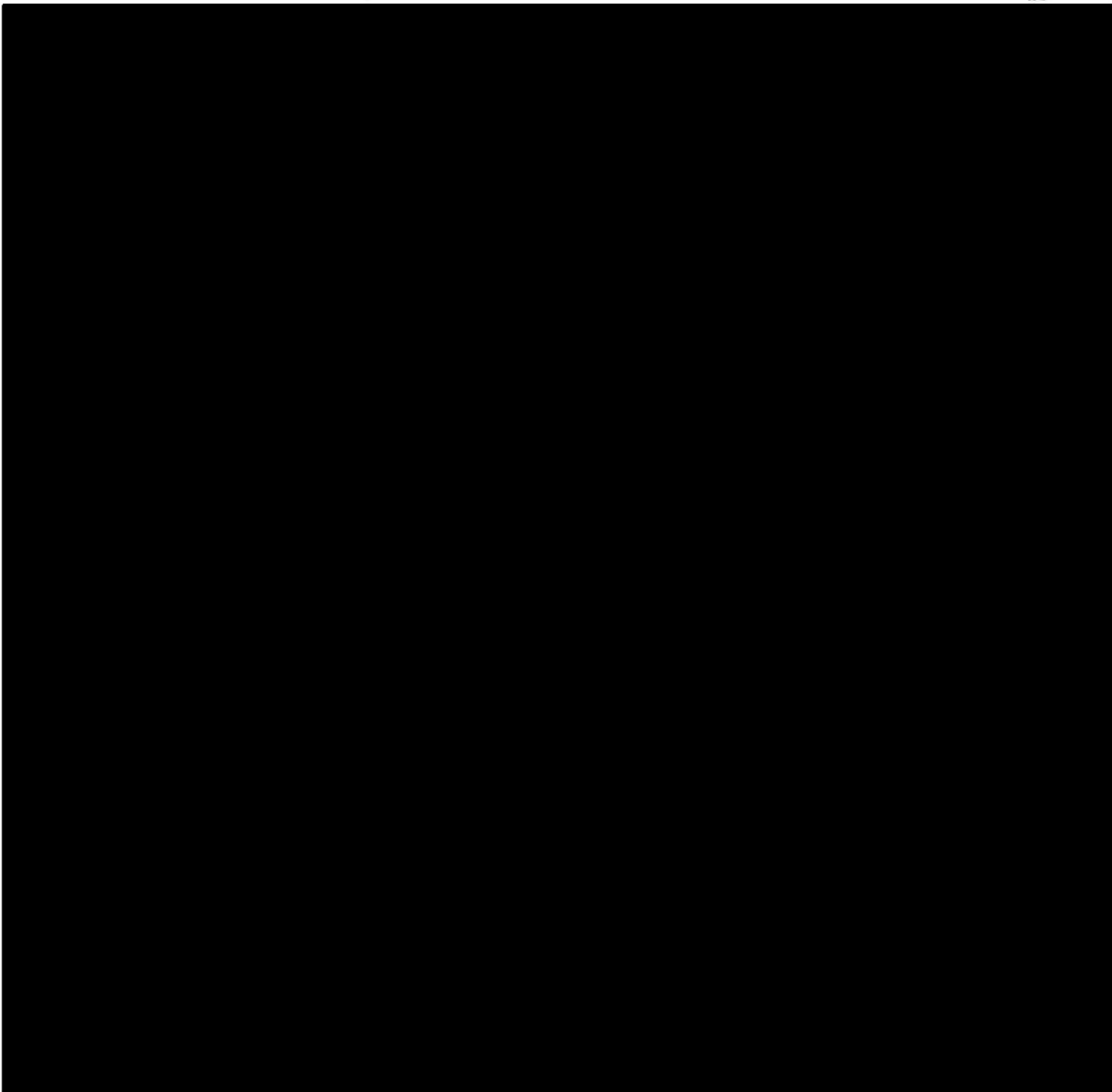
Scheme pertaining to this Panel, the defendant [REDACTED]

[REDACTED] worked as a Buyer, and the defendant

[REDACTED] together

with others, worked as a Stuffer.

[REDACTED]



COUNT THREE

(Conspiracy to Commit Mail and Wire Fraud – Strongbox.cc Admin Panel)

38. The allegations contained in paragraphs one through 25 and 27 are realleged and incorporated as though fully set forth in this paragraph.

39. In or about and between February 2013 and June 2017, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the

defendants [REDACTED]

[REDACTED] RUSLAN

ALBERTOVICH NURULLIN, also known as "ray.nolan" and "nolan," [REDACTED]

[REDACTED] NIKOLAJ SOFINSKIJ,

also known as "paganini," "Nikola Sofinskiy" and "Mykola Petrovych Sofynskyi," and

[REDACTED] together with others, did knowingly and intentionally conspire to devise a scheme and artifice to defraud Fraud Victims, and to obtain money and property from Fraud Victims by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice: (a) to place and cause to be placed in a post office and authorized depository for mail matter, one or more matters and things to be sent and delivered by the United States Postal Service, and to deposit and cause to be deposited one or more matters and things to be sent and delivered by one or more private and commercial interstate carriers, to wit: merchandise purchased from Online Retailers as part of the scheme, contrary to Title 18, United States Code, Section 1341; and (b) to transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce, one or more writings, signs, signals, pictures and sounds, to wit: electronic communications between and among coconspirators, contrary to Title 18, United States Code, Section 1343.

(Title 18, United States Code, Sections 1349 and 3551 et seq.)

COUNT FOUR

(Conspiracy to Commit Money Laundering – Strongbox.cc Admin Panel)

40. The allegations contained in paragraphs one through 25 and 27 are realleged and incorporated as though fully set forth in this paragraph.

41. In or about and between February 2013 and June 2017, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants [REDACTED]

[REDACTED] [REDACTED]
[REDACTED] RUSLAN ALBERTOVICH NURULLIN, also known as “ray.nolan” and “nolan,” [REDACTED]

NIKOLAJ SOFINSKIJ, also known as “paganini,” “Nikola Sofinskiy” and “Mykola Petrovych Sofinskiy,” [REDACTED] together with others, did knowingly and intentionally conspire: (a) to conduct one or more financial transactions affecting interstate and foreign commerce, to wit: interstate and foreign transfers of funds, which transactions in fact involved the proceeds of specified unlawful activity, to wit: the Specified Unlawful Activities, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, with the intent to promote the carrying on of specified unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(A)(i); and (b) to conduct one or more financial transactions affecting interstate and foreign commerce, to wit: interstate and foreign transfers of funds, which transactions in fact involved the proceeds of the Specified Unlawful Activities, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, and knowing that the transactions were designed in whole

and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of specified unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(B)(i).

(Title 18, United States Code, Sections 1956(h) and 3551 et seq.)

COUNT FIVE

(Conspiracy to Commit Mail and Wire Fraud – Arenaproject.it Admin Panel)

42. The allegations contained in paragraphs one through 25 and 28 are realleged and incorporated as though fully set forth in this paragraph.

43. In or about and between May 2013 and November 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants

RUSLAN

ALBERTOVICH NURULLIN, also known as “ray.nolan” and “nolan,”

NIKOLAJ SOFINSKIJ,

also known as “paganini,” “Nikola Sofinskiy” and “Mykola Petrovych Sofinskyi,”

together with others, did knowingly and intentionally conspire to devise a scheme and artifice to defraud Fraud Victims, and to obtain money and property from Fraud Victims by means of materially false and fraudulent pretenses, representations and promises, and for the

purpose of executing such scheme and artifice: (a) to place and cause to be placed in a post office and authorized depository for mail matter, one or more matters and things to be sent and delivered by the United States Postal Service, and to deposit and cause to be deposited one or more matters and things to be sent and delivered by one or more private and commercial interstate carriers, to wit: merchandise purchased from Online Retailers as part of the scheme, contrary to Title 18, United States Code, Section 1341; and (b) to transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce, one or more writings, signs, signals, pictures and sounds, to wit: electronic communications between and among coconspirators, contrary to Title 18, United States Code, Section 1343.

(Title 18, United States Code, Sections 1349 and 3551 et seq.)

COUNT SIX

(Conspiracy to Commit Money Laundering – Arenaproject.it Admin Panel)

44. The allegations contained in paragraphs one through 25 and 28 are realleged and incorporated as though fully set forth in this paragraph.

45. In or about and between May 2013 and November 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants [REDACTED]

[REDACTED] RUSLAN ALBERTOVICH NURULLIN, also known as “ray.nolan” and “nolan,” [REDACTED]

NIKOLAJ SOFINSKIJ, also known as “paganini,” “Nikola Sofinskiy” and “Mykola Petrovych Sofinskyi,” [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED] together with others, did knowingly and intentionally conspire:

(a) to conduct one or more financial transactions affecting interstate and foreign commerce, to wit: interstate and foreign transfers of funds, which transactions in fact involved the proceeds of specified unlawful activity, to wit: the Specified Unlawful Activities, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, with the intent to promote the carrying on of specified unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(A)(i); and (b) to conduct one or more financial transactions affecting interstate and foreign commerce, to wit: interstate and foreign transfers of funds, which transactions in fact involved the proceeds of the Specified Unlawful Activities, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of specified unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(B)(i).

(Title 18, United States Code, Sections 1956(h) and 3551 et seq.)

[REDACTED]



COUNT EIGHT

(Conspiracy to Commit Mail and Wire Fraud – Astra Star Ave Admin Panel)

48. The allegations contained in paragraphs one through 25 and 29 are realleged and incorporated as though fully set forth in this paragraph.

49. In or about and between June 2013 and June 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED] RUSLAN

ALBERTOVICH NURULLIN, also known as “ray.nolan” and “nolan,”

[REDACTED] NIKOLAJ SOFINSKIJ,

also known as “paganini,” “Nikola Sofinskiy” and “Mykola Petrovych Sofinskyi,”



[REDACTED]

together with others, did knowingly and intentionally conspire to devise a scheme and artifice to defraud Fraud Victims, and to obtain money and property from Fraud Victims by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice: (a) to place and cause to be placed in a post office and authorized depository for mail matter, one or more matters and things to be sent and delivered by the United States Postal Service, and to deposit and cause to be deposited one or more matters and things to be sent and delivered by one or more private and commercial interstate carriers, to wit: merchandise purchased from Online Retailers as part of the scheme, contrary to Title 18, United States Code, Section 1341; and (b) to transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce, one or more writings, signs, signals, pictures and sounds, to wit: electronic communications between and among coconspirators, contrary to Title 18, United States Code, Section 1343.

(Title 18, United States Code, Sections 1349 and 3551 et seq.)

COUNT NINE

(Conspiracy to Commit Money Laundering – Astra Star Ave Admin Panel)

50. The allegations contained in paragraphs one through 25 and 29 are realleged and incorporated as though fully set forth in this paragraph.

51. In or about and between June 2013 and June 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants [REDACTED]

[REDACTED]

[REDACTED] RUSLAN ALBERTOVICH NURULLIN, also known as “ray.nolan”

and "nolan," [REDACTED]

NIKOLAJ SOFINSKIJ, also known as "paganini," "Nikola Sofinskiy" and "Mykola

Petrovych Sofinskiy, [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] together with others, did knowingly and intentionally conspire:

(a) to conduct one or more financial transactions affecting interstate and foreign commerce, to wit: interstate and foreign transfers of funds, which transactions in fact involved the proceeds of specified unlawful activity, to wit: the Specified Unlawful Activities, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, with the intent to promote the carrying on of specified unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(A)(i); and (b) to conduct one or more financial transactions affecting interstate and foreign commerce, to wit: interstate and foreign transfers of funds, which transactions in fact involved the proceeds of the Specified Unlawful Activities, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of specified unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(B)(i).

(Title 18, United States Code, Sections 1956(h) and 3551 et seq.)

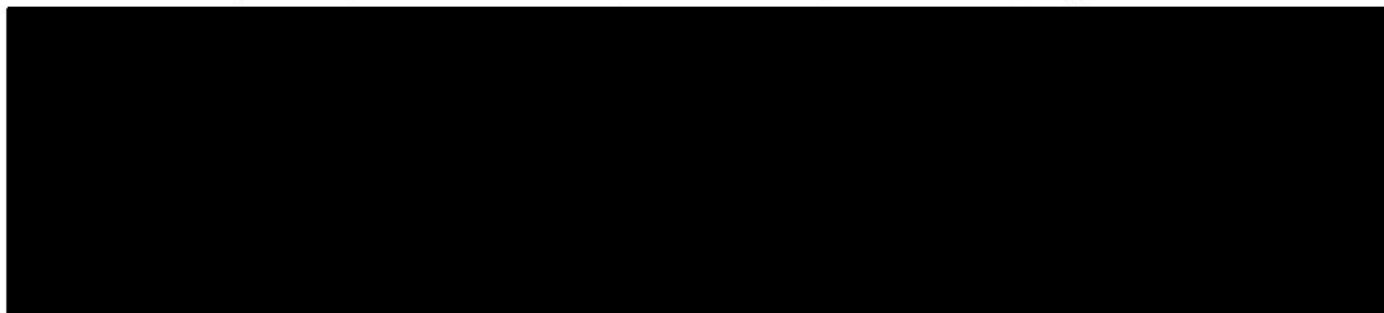
COUNTS TEN AND ELEVEN
(Mail Fraud – Astra Star Ave Admin Panel)

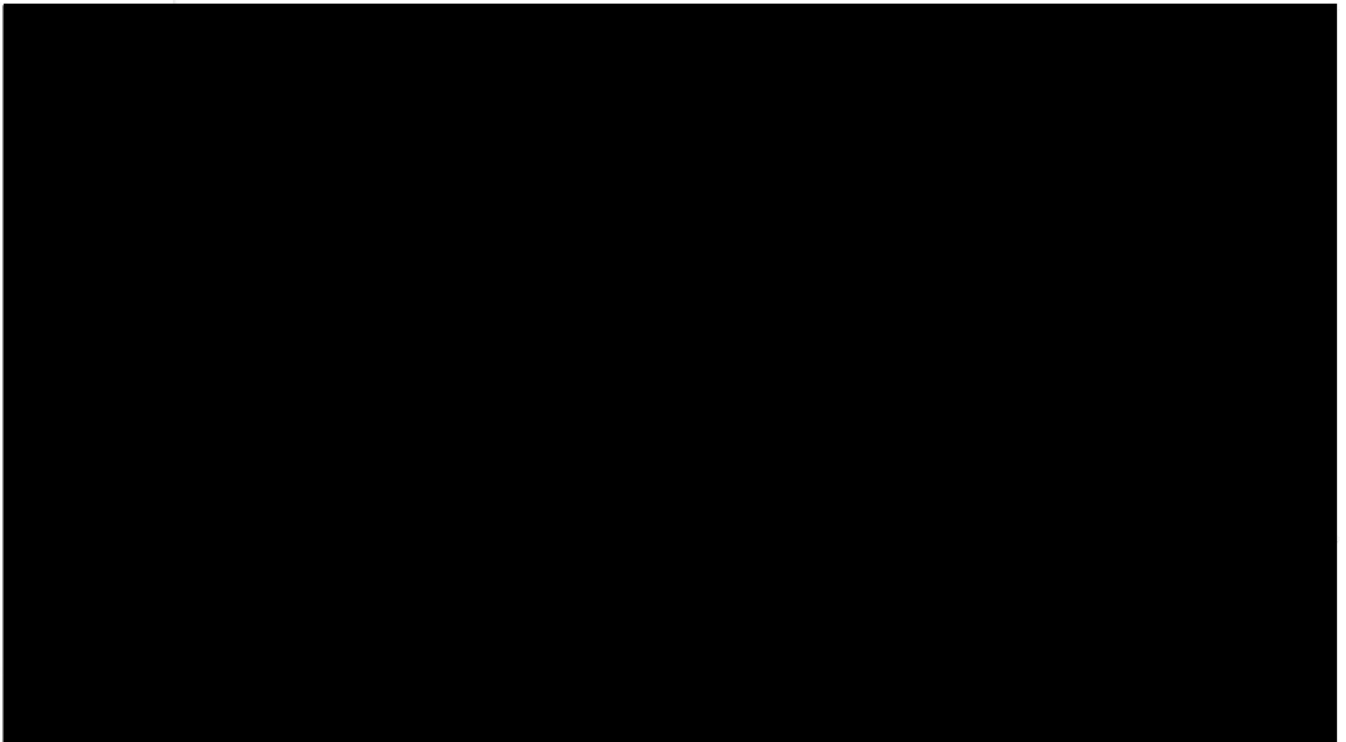
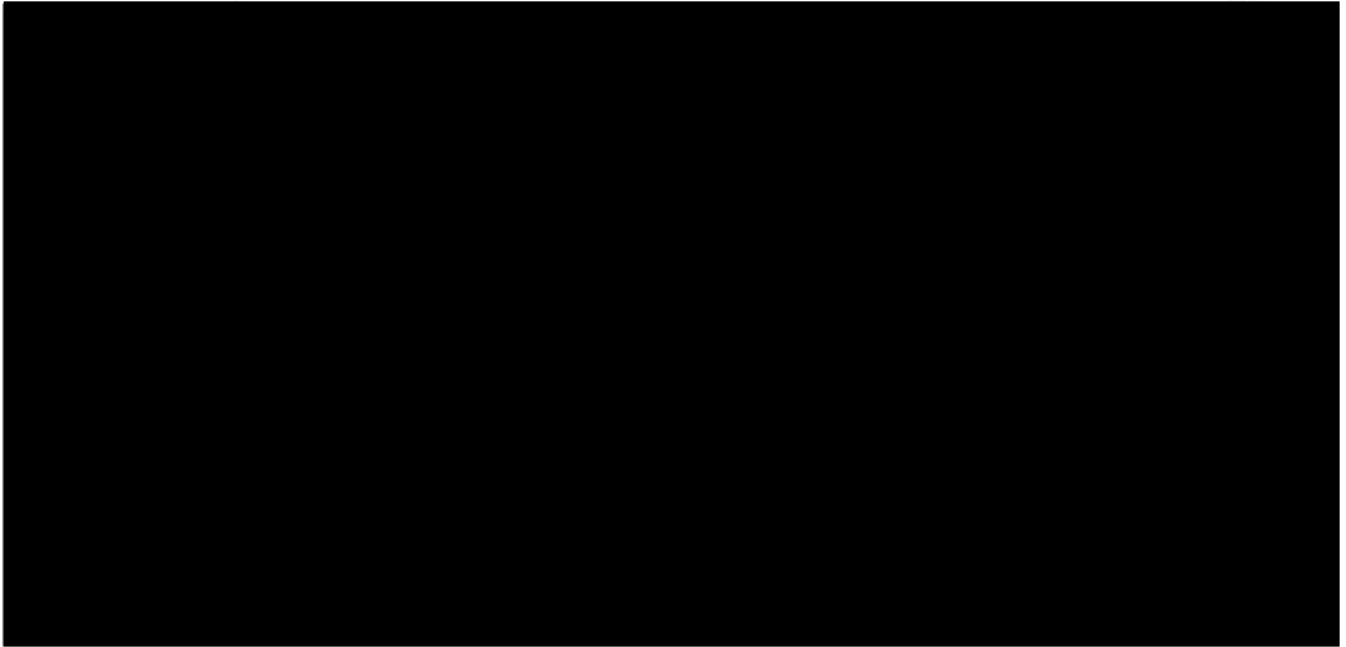
52. The allegations contained in paragraphs one through 25 and 29 are realleged and incorporated as though fully set forth in this paragraph.

53. On or about the dates set forth below, within the Eastern District of New York and elsewhere, the defendants listed below, together with others, did knowingly and intentionally devise a scheme and artifice to defraud Fraud Victims, and to obtain money and property from Fraud Victims by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing and attempting to execute such scheme and artifice, the defendants listed below did knowingly and intentionally place in a post office and authorized depository for mail matter one or more matters and things, and cause to be delivered by the United States Postal Service and one or more private and commercial interstate carriers, according to directions thereon, one or more matters and things, to wit: merchandise purchased with other individuals' PII, as set forth below:

COUNT	MAILING DATE	ITEM	DEFENDANTS
TEN			
ELEVEN			
	March 19, 2015	Apple iPhone 6	NURULLIN

(Title 18, United States Code, Sections 1341, 2 and 3551 et seq.)





COUNTS FIFTEEN THROUGH TWENTY
(Aggravated Identity Theft – Astra Star Ave Admin Panel)

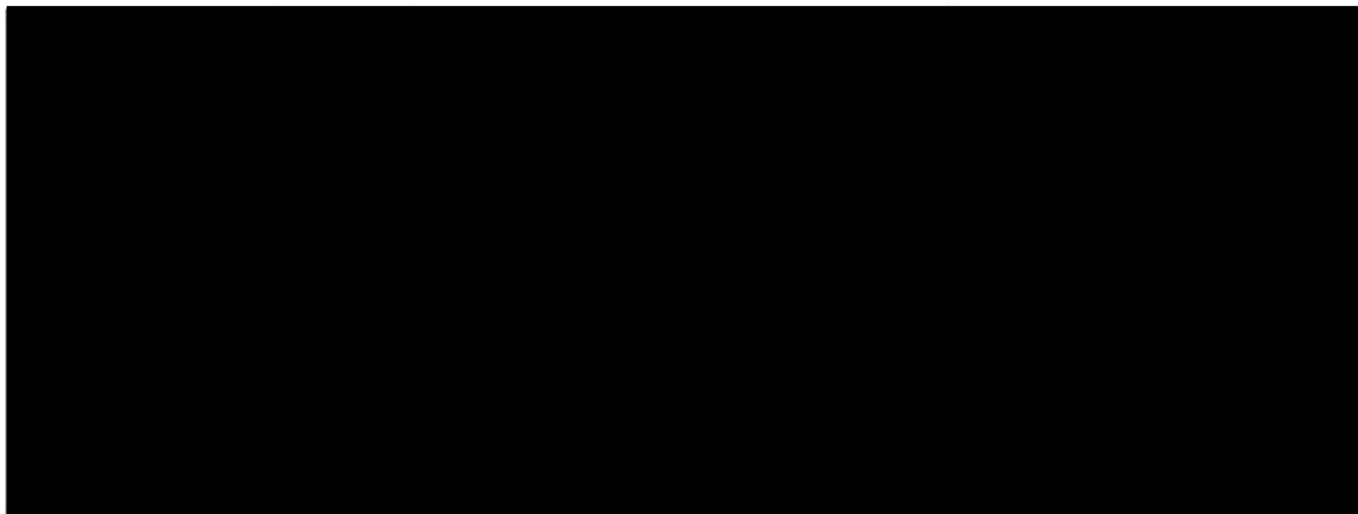
56. The allegations contained in paragraphs one through 25 and 29 are realleged and incorporated as though fully set forth in this paragraph.

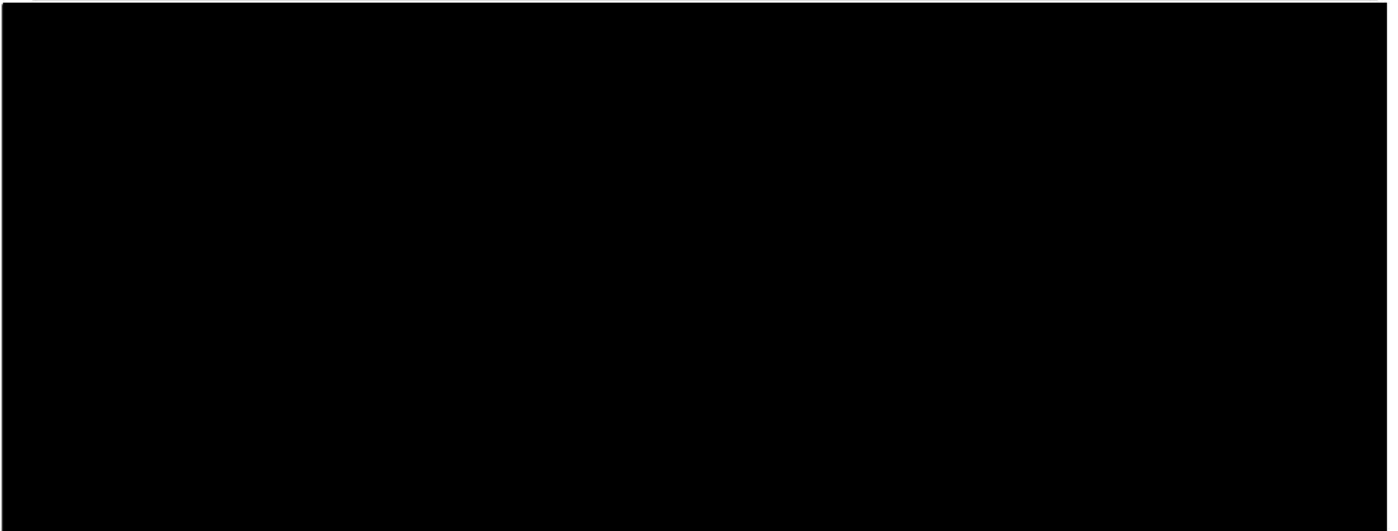
57. On or about the dates set forth below, within the Eastern District of New York and elsewhere, the defendants listed below, together with others, during and in relation to the offenses charged in Counts Eight through Fourteen, did knowingly and intentionally transfer, possess and use, without lawful authority, one or more means of identification of one or more other persons, to wit: Fraud Victims #3 through #8, individuals whose identities are known to the Grand Jury, knowing that the means of identification belonged to another person.

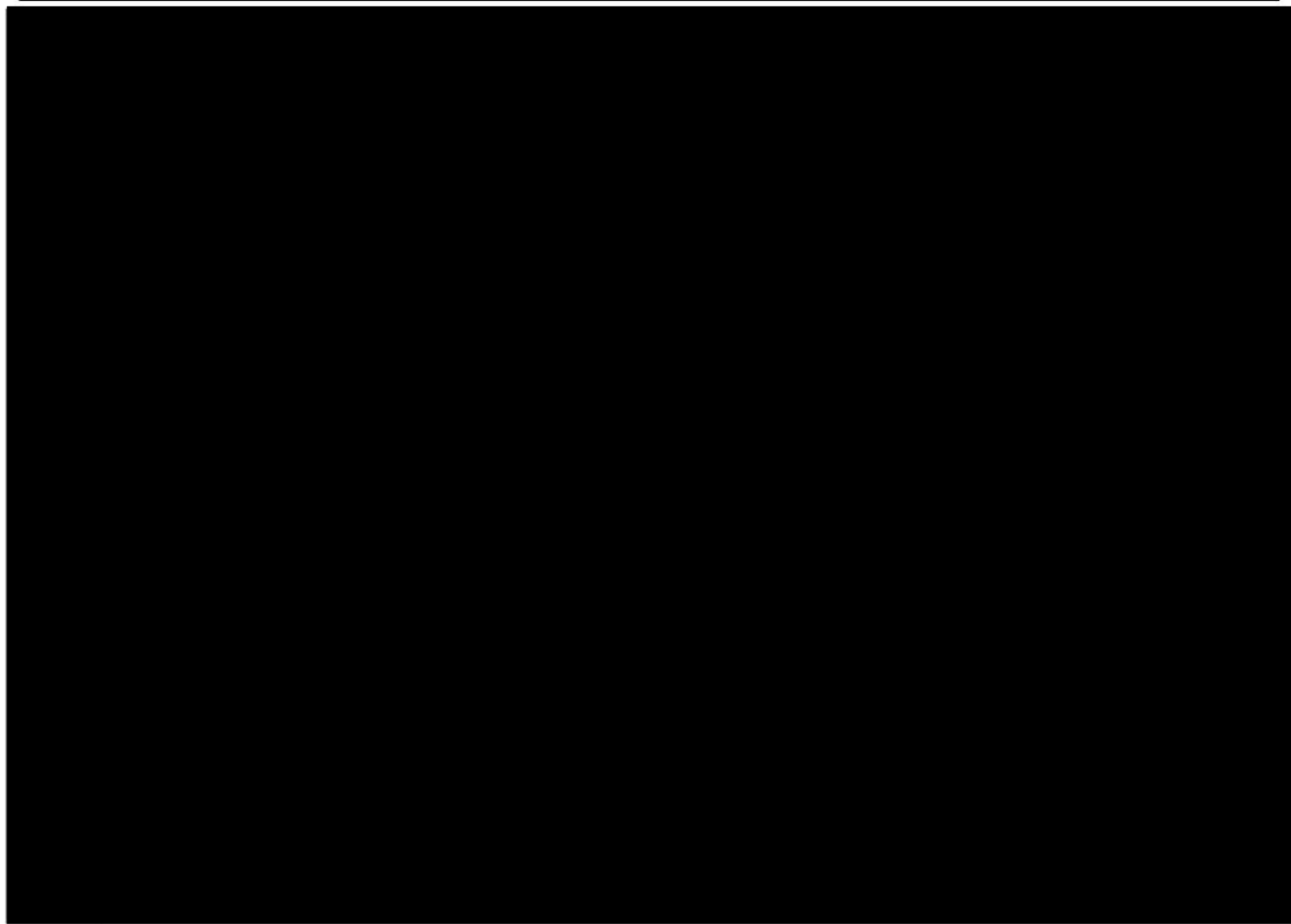
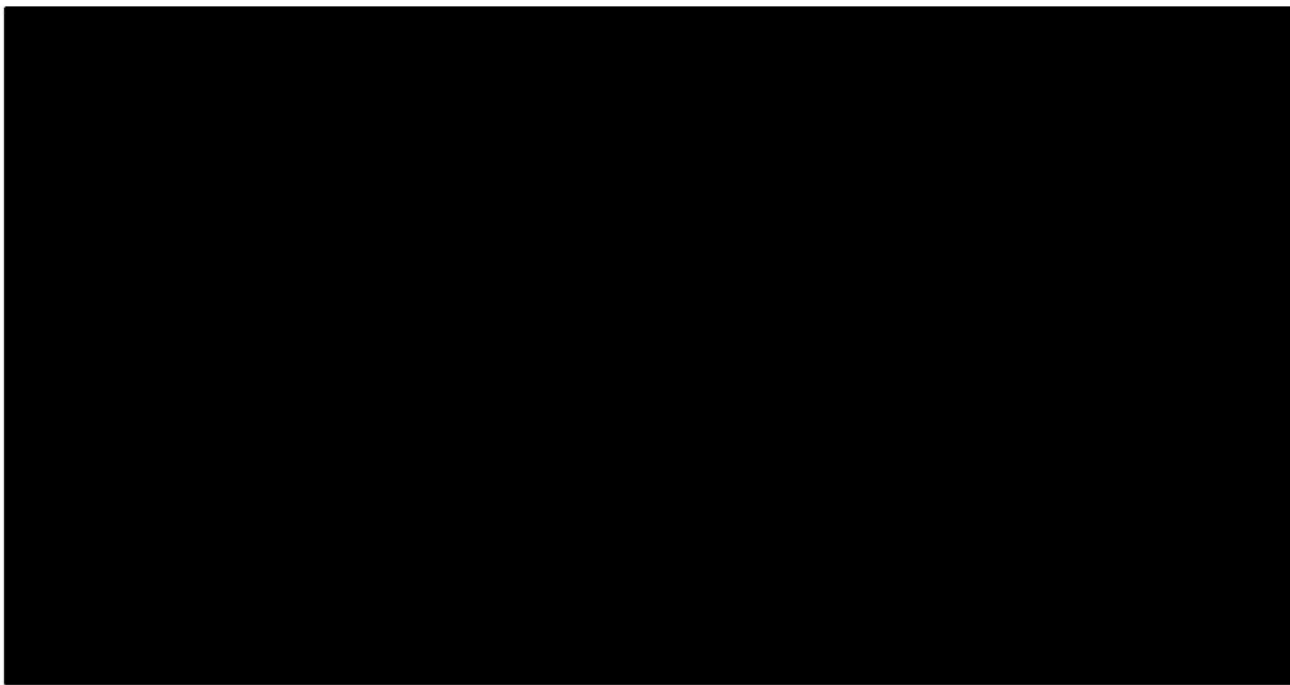
COUNT	APPROXIMATE DATE	MEANS OF ID	DEFENDANT(S)
FIFTEEN			
SIXTEEN	December 1, 2014	Name and home address of Fraud Victim #4	SOFINSKIJ
SEVENTEEN			
EIGHTEEN			
NINETEEN	March 19, 2015	Name and account number of Fraud Victim #7	NURULLIN
TWENTY			

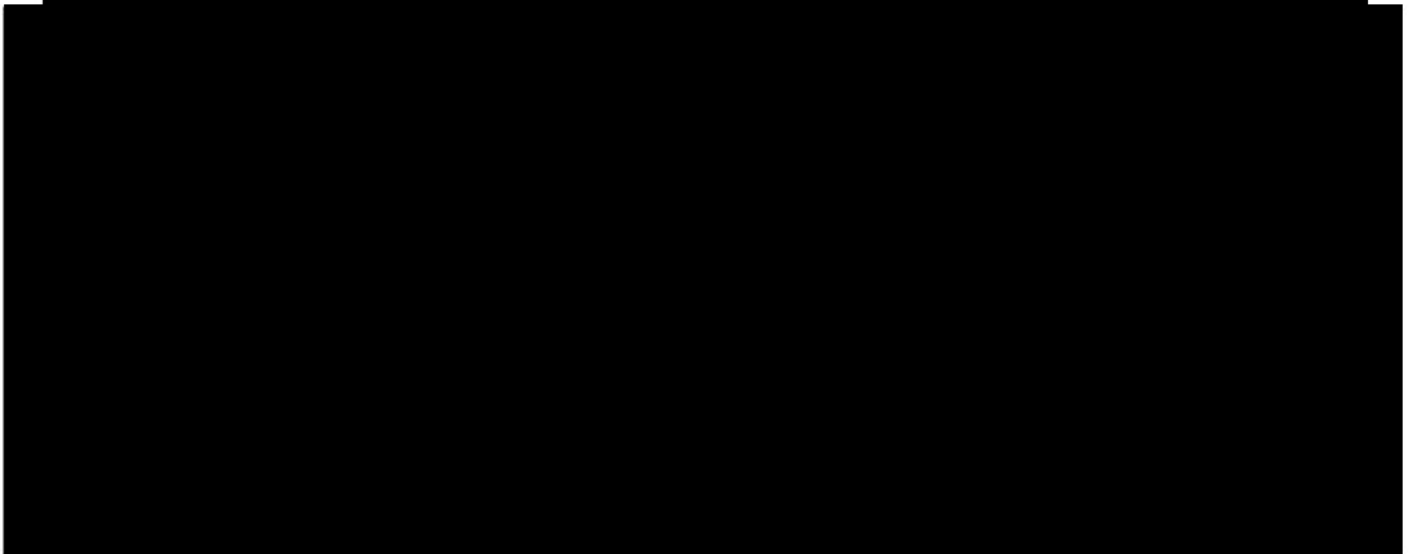
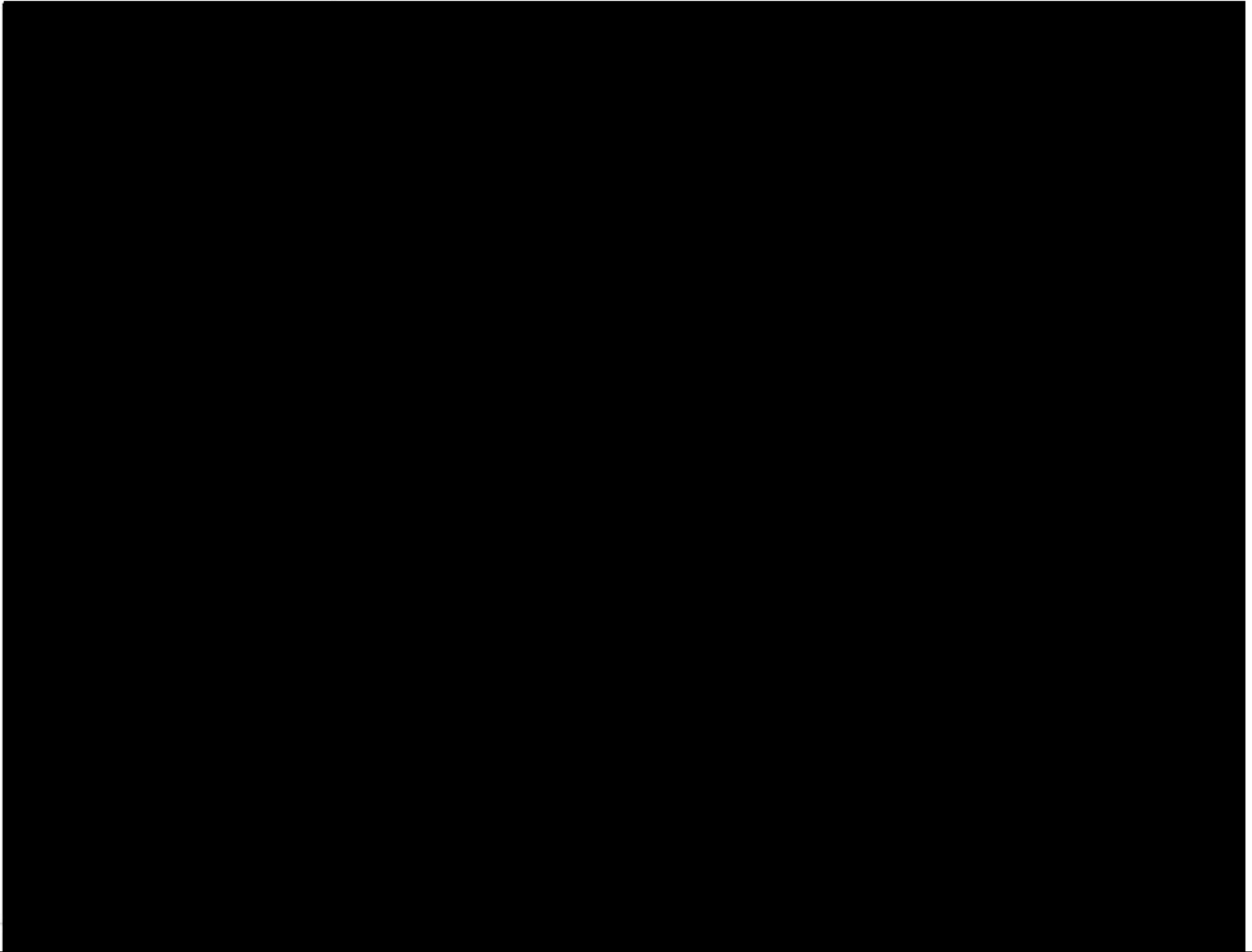
(Title 18, United States Code, Sections 1028A(a)(1), 1028A(b), 1028A(c)(5),

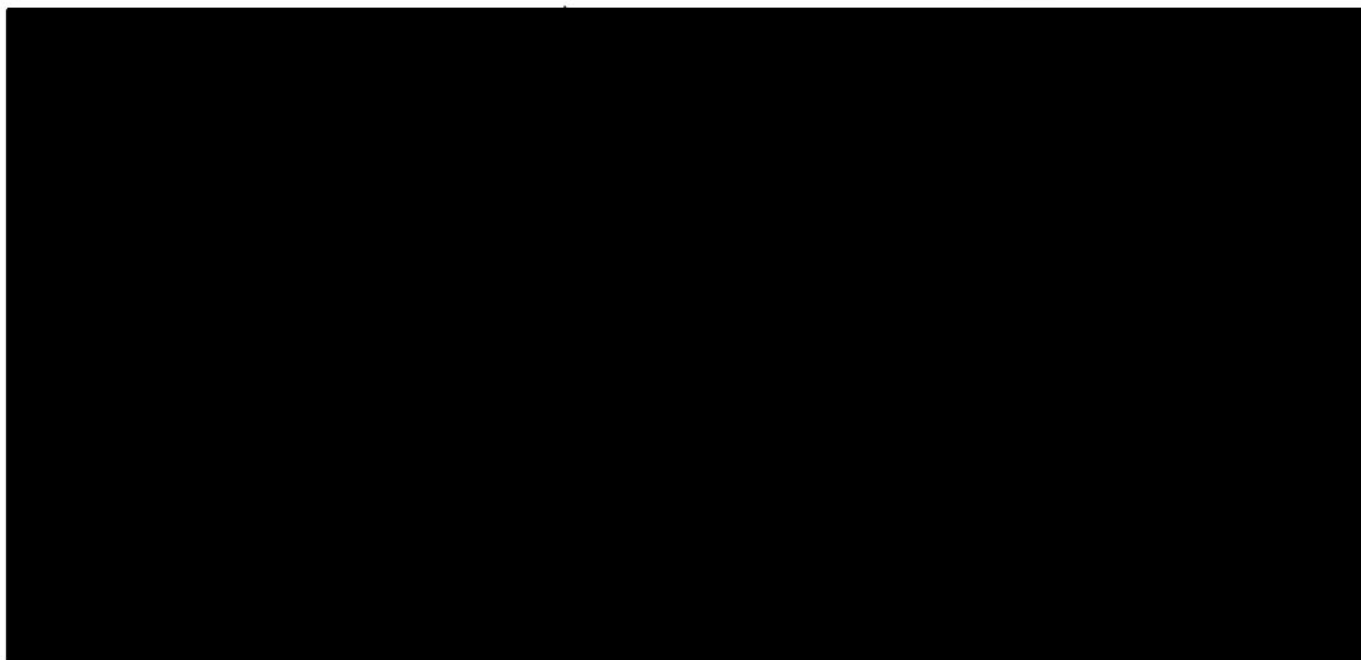
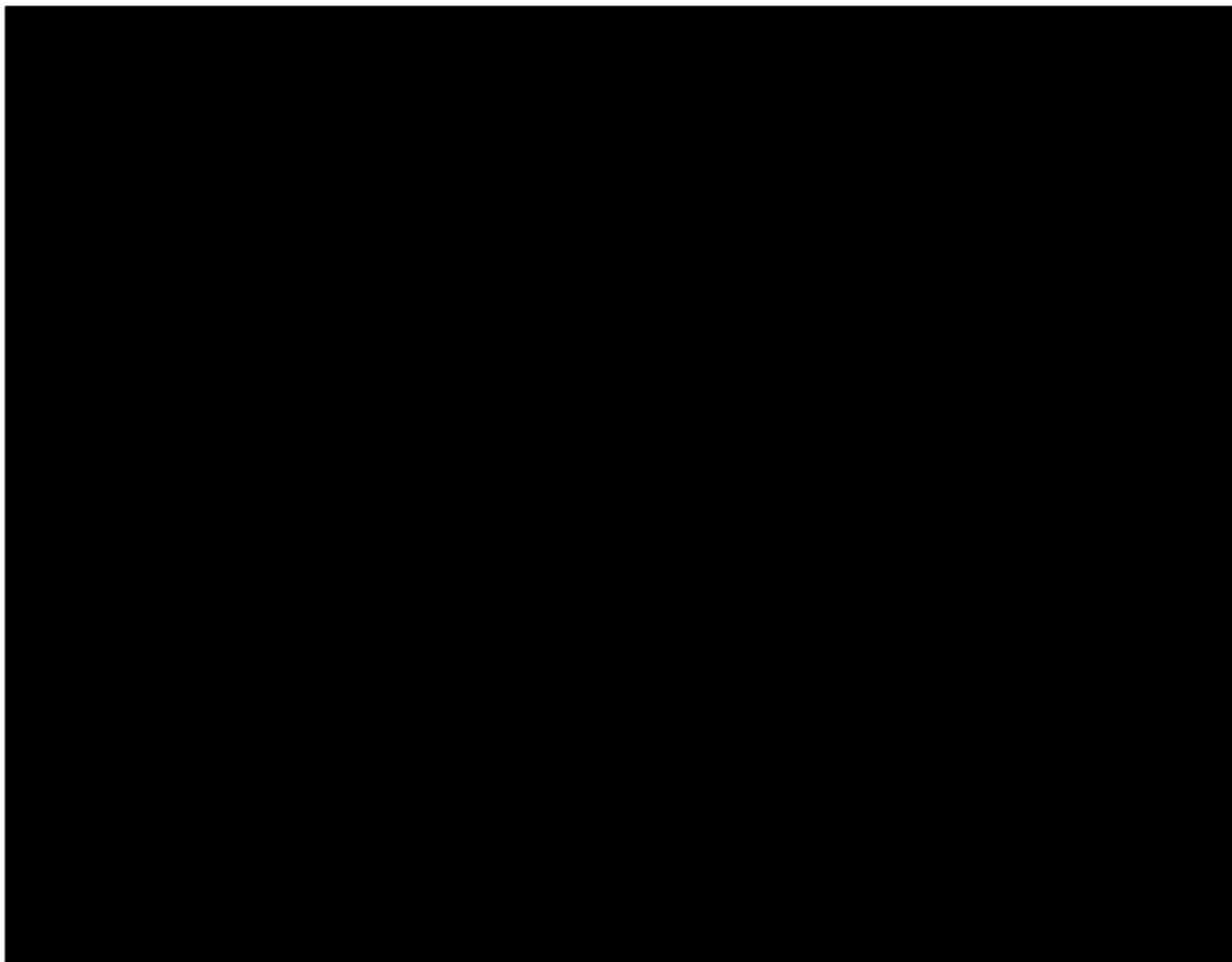
2 and 3551 et seq.)

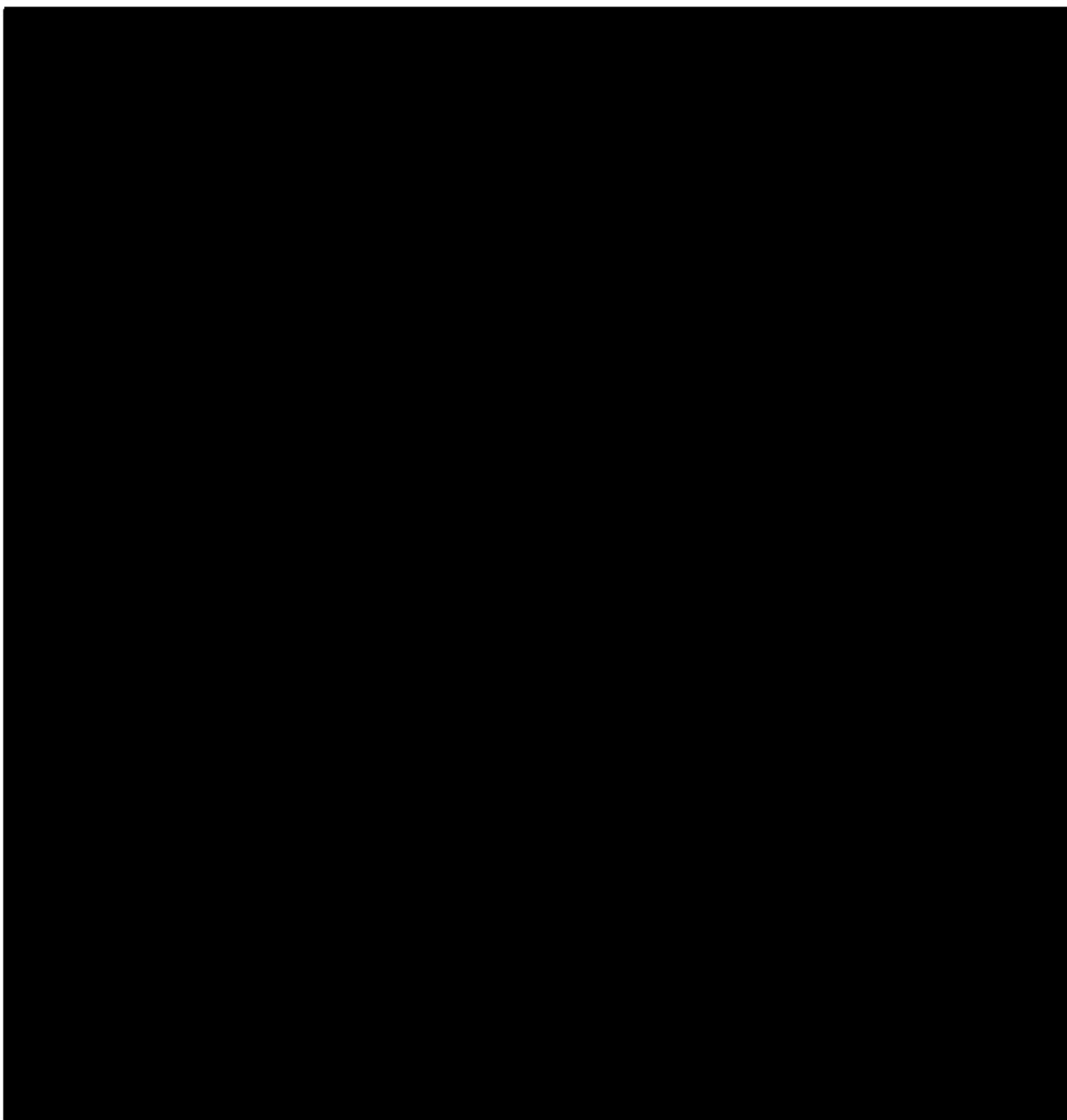
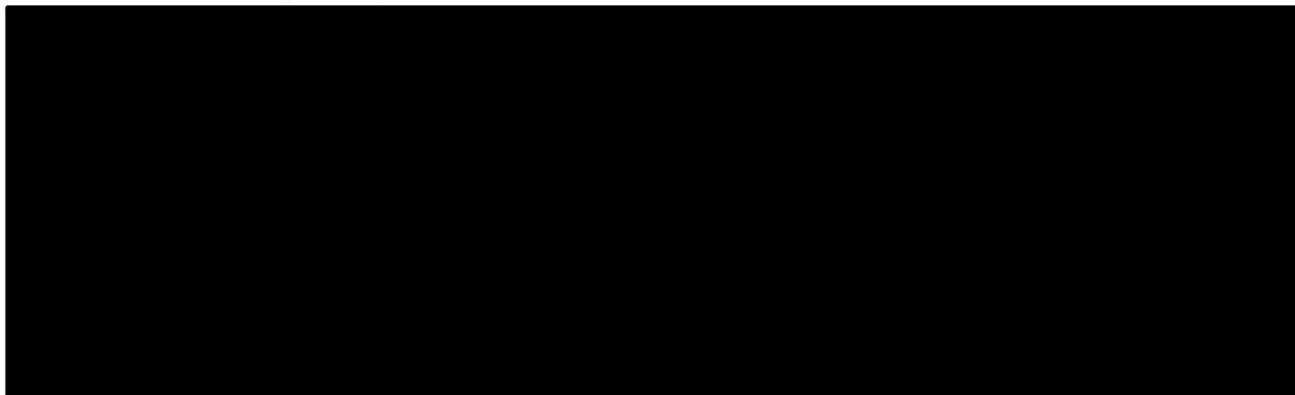


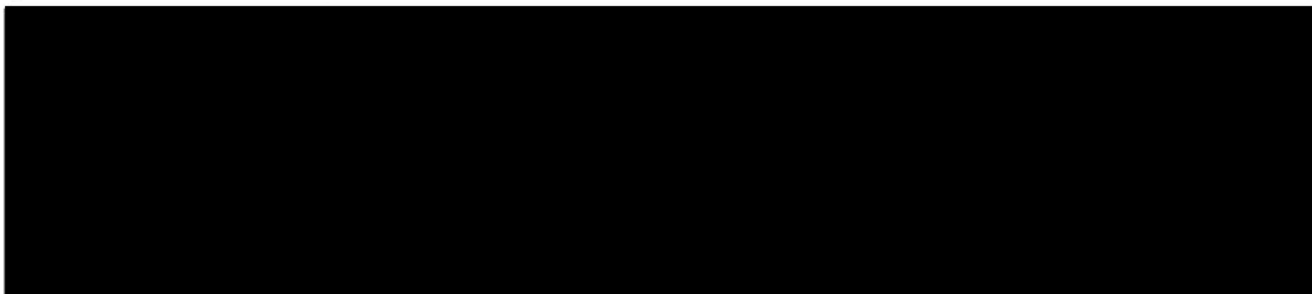
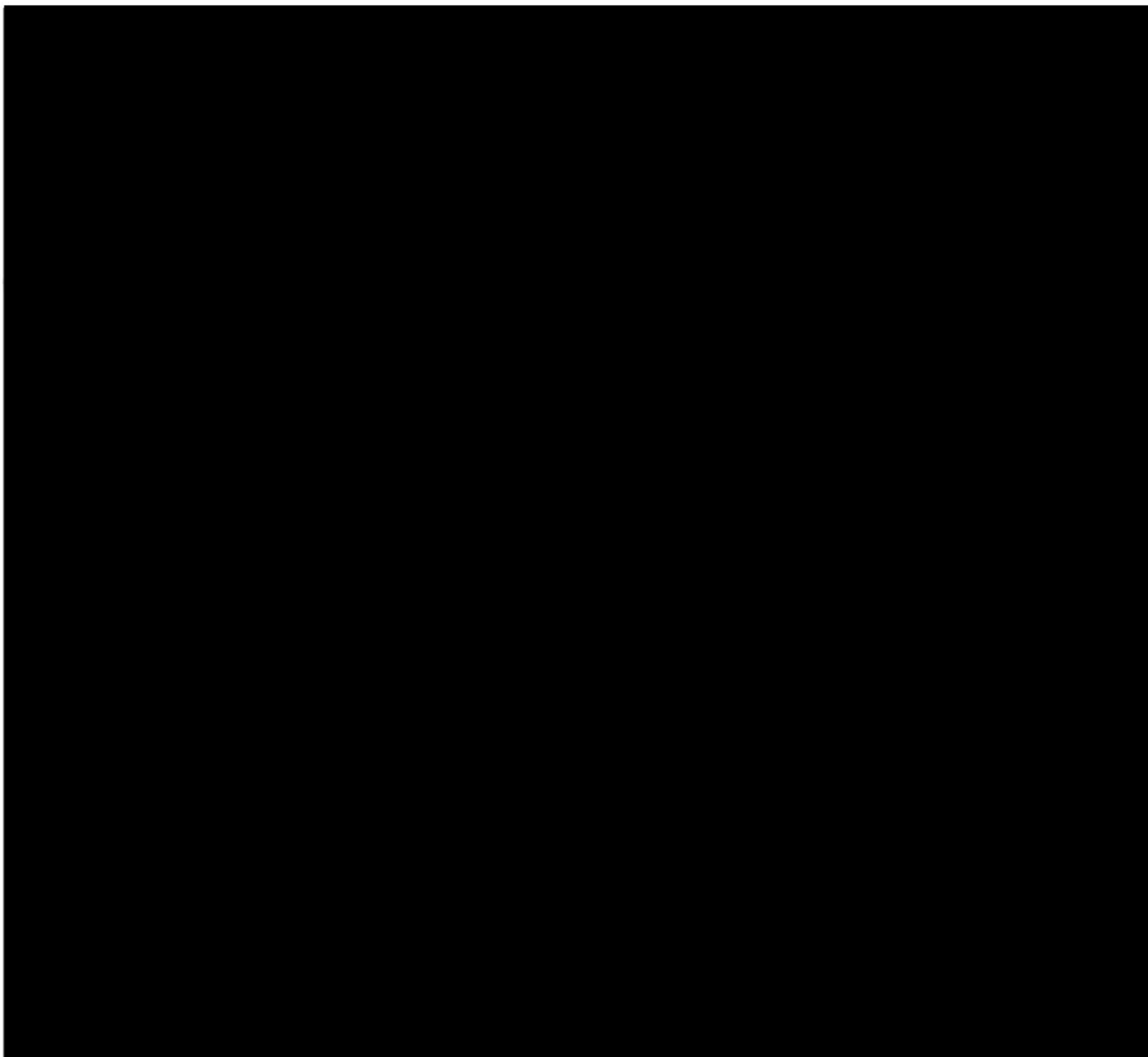
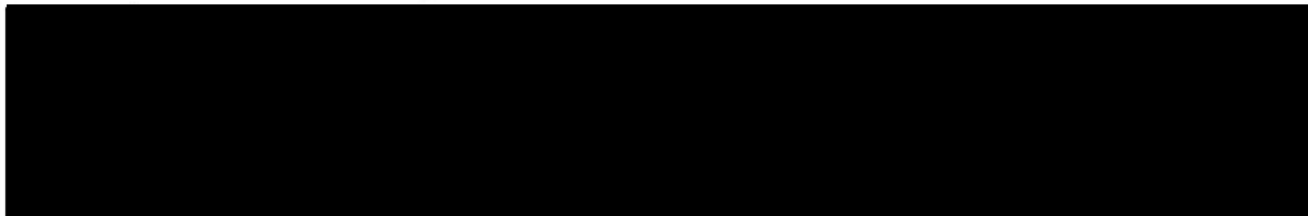
















COUNT THIRTY

(Conspiracy to Commit Mail and Wire Fraud – USS-Design Admin Panel)

76. The allegations contained in paragraphs one through 25 and 33 are realleged and incorporated as though fully set forth in this paragraph.

77. In or about and between February 2017 and June 2017, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants

 and ALEKSANDR POPAN,  also known as “exemption,” “popanus,” “Alexander Popan,” “Alexandr Popan” and “Alexander Popandopulo,” together with others, did knowingly and intentionally conspire to devise a scheme and artifice to defraud Fraud Victims, and to obtain money and property

from Fraud Victims by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice: (a) to place and cause to be placed in a post office and authorized depository for mail matter, one or more matters and things to be sent and delivered by the United States Postal Service, and to deposit and cause to be deposited one or more matters and things to be sent and delivered by one or more private and commercial interstate carriers, to wit: merchandise purchased from Online Retailers as part of the scheme, contrary to Title 18, United States Code, Section 1341; and (b) to transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce, one or more writings, signs, signals, pictures and sounds, to wit: electronic communications between and among coconspirators, contrary to Title 18, United States Code, Section 1343, in the course of which POPAN, together with others, did knowingly and intentionally falsely register and use a domain name.

(Title 18, United States Code, Sections 1349, 3559(g)(1) and 3551 et seq.)

COUNT THIRTY-ONE

(Conspiracy to Commit Money Laundering – USS-Design Admin Panel)

78. The allegations contained in paragraphs one through 25 and 33 are realleged and incorporated as though fully set forth in this paragraph.

79. In or about and between February 2017 and June 2017, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants [REDACTED] and ALEKSANDR POPAN, also known as “exemption,” “popanus,” “Alexander Popan,” “Alexandr Popan” and “Alexander Popandopulo,” together with others, did knowingly and intentionally conspire: (a) to conduct one or more financial transactions affecting interstate

and foreign commerce, to wit: interstate and foreign transfers of funds, which transactions in fact involved the proceeds of specified unlawful activity, to wit: the Specified Unlawful Activities, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, with the intent to promote the carrying on of specified unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(A)(i); and (b) to conduct one or more financial transactions affecting interstate and foreign commerce, to wit: interstate and foreign transfers of funds, which transactions in fact involved the proceeds of the Specified Unlawful Activities, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of specified unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(B)(i), in the course of which POPAN, together with others, did knowingly and intentionally falsely register and use a domain name.

(Title 18, United States Code, Sections 1956(h), 3559(g)(1), and 3551 et seq.)

COUNT THIRTY-TWO

(Aggravated Identity Theft – USS-Design Admin Panel)

80. The allegations contained in paragraphs one through 25 and 33 are realleged and incorporated as though fully set forth in this paragraph.

81. In or about and between February 2017 and June 2017, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants [REDACTED] and ALEKSANDR POPAN, also known as “exemption,” “popanus,” “Alexander Popan,” “Alexandr Popan” and

“Alexander Popandopulo,” together with others, during and in relation to the offenses charged in Counts Thirty and Thirty-One, did knowingly and intentionally transfer, possess and use, without lawful authority, one or more means of identification of another person, to wit: Fraud Victim #11, an individual whose identity is known to the Grand Jury, knowing that the means of identification belonged to another person.

(Title 18, United States Code, Sections 1028A(a)(1), 1028A(b), 1028A(c)(5), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS ONE, THREE, FIVE, EIGHT, TEN THROUGH FOURTEEN,
TWENTY-ONE THROUGH TWENTY-THREE, TWENTY-FIVE AND
TWENTY-SEVEN THROUGH THIRTY

82. The United States hereby gives notice to the defendants charged in Counts One, Three, Five, Eight, Ten through Fourteen, Twenty-One through Twenty-Three, Twenty-Five and Twenty-Seven through Thirty that, upon their conviction of any such offenses, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offenses to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offenses.

83. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or 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;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS FOUR, SIX, NINE AND THIRTY-ONE

84. The United States hereby gives notice to the defendants charged in Counts Four, Six, Nine and Thirty-One that, upon their conviction of any such offenses, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(1), which requires any person convicted of such offenses to forfeit any property, real or personal, involved in such offenses, or any property traceable to such property.

85. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or 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;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 982(a)(1) and 982(b)(1); Title 21, United States Code, Section 853(p))

A TRUE BILL

FOREPERSON

Richard P. Donoghue
RICHARD P. DONOGHUE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.


 *et al.*

Defendants.

INDICTMENT

(T. 18, U.S.C. §§ 981(a)(1)(C), 982(a)(1), 982(b)(1), 1028A(a)(1), 1028A(b),
1028A(c)(5), 1341, 1343, 1349, 1956(h), 3559(g)(1), 2 and 3551 et seq.; T. 21,
U.S.C., § 853(p); T. 28, U.S.C. § 2461(c))

A true bill.

 *Foreperson*

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Nicholas J. Moscow, Assistant U.S. Attorney (718) 254-6212;
Chad McHenry and James Yoon, DOJ Trial Attorneys