

FILED

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

2020 OCT -6 PM 12:40  
CLERK, US DISTRICT COURT  
MIDDLE DISTRICT FLORIDA  
TAMPA, FLORIDA

UNITED STATES OF AMERICA

v.

CASE NO. 8:20 cr 308 T 02 CPT

IHOR RADIONOV

18 U.S.C. § 371  
18 U.S.C. § 554  
22 U.S.C. § 2778

**INDICTMENT**

The Grand Jury charges:

**COUNT ONE**  
**(Conspiracy)**

**A. Introduction**

At times material to this Indictment:

1. Ihor Radionov (“RADIONOV”) was a naturalized United States citizen, born in the Union of Soviet Socialist Republics (“USSR”), who resided in Alpharetta, Georgia, within the Northern District of Georgia. Vladimir Volgaev was a naturalized United States citizen, born in the USSR, who resided in Sarasota, Florida, within the Middle District of Florida. Conspirator #1 was a Ukrainian citizen and resident who, at times, traveled to the Northern District of Georgia and Middle District of Florida.

2. The commercial export of arms, ammunition, implements of war and defense articles, and services from the United States was governed by the Arms Export Control Act (“AECA”), 22 U.S.C. § 2778, and the International Traffic in Arms Regulations (“ITAR”), 22 C.F.R. §§ 120-130.

3. The AECA authorized the President to, among other things, control the export of “defense articles” deemed critical to the national security and foreign policy interests of the United States. The AECA also authorized the President to designate items as defense articles, require licenses for the export of such articles, and promulgate regulations for the export of such articles. By executive order, the President had delegated this authority to the United States Department of State, Directorate of Defense Trade Controls (“DDTC”). Accordingly, the DDTC promulgated regulations under the AECA, which were known as the ITAR.

4. The ITAR implemented the provisions of the AECA, and established the framework for regulating the export of defense articles. The ITAR defined an “export” as the sending or taking of a defense article out of the United States in any manner. The ITAR defined a “defense article” to be any item on the United States Munitions List (“USML”). The ITAR contained the USML.

5. The USML set forth 21 categories of defense articles and services that were subject to export licensing controls. During the dates charged in this Indictment, non-automatic and semi-automatic firearms up to .50 caliber inclusive (12.7 mm) were defense articles within USML Category I(a). In addition, barrels, cylinders, receivers (frames) or complete breech mechanisms for the articles in Category I(a) were defense articles within USML Category I(g). Further, components, parts, accessories and attachments for the articles in Category I(a) were defense articles within USML Category I(h). The following defense articles, as defined in USML Category I(a), I(g), and I(h), are referred to herein as “firearm components.”

<b>Firearm Component</b>	<b>Description</b>	<b>USML Category</b>
1	Walther PPK/S Gun Part Kit	I(a), I(h)
2	Glock 30 Slide	I(a), I(h)
3	Glock 17 Slide and Barrel	I(a), I(g)
4	Glock 42 Slide	I(a), I(h)
5	Glock 19 Slide	I(a), I(h)
6	Glock 43 Slide	I(a), I(h)
7	Glock 33 Slide	I(a), I(h)
8	Glock 27 Slide and Barrel	I(a), I(g)
9	Mauser 1910 Barrel	I(a), I(g)
10	Walther P99 Barrel	I(a), I(g)
11	Glock 43 Barrel	I(a), I(g)
12	Glock 17 Slide and Barrel	I(a), I(g)
13	Glock 43 Slide	I(a), I(h)
14	Scorpion Parts Barrel	I(a), I(g), I(h)
15	Glock 17 Barrel	I(a), I(g)
16	Glock 17 Barrel	I(a), I(g)

6. Persons desiring to export arms, ammunitions, implements of war, and other defense articles and services specified on the USML from the United States were required to register with the DDTC and obtain individual export licenses for each shipment abroad prior to the export, as set forth in 22 C.F.R. §§ 122 and 123. At all times relevant to this Indictment, it was illegal to willfully export or attempt to export, conspire to export, or cause to be exported, firearm components on the USML without a license or written authorization from the DDTC.

7. At no time did RADIONOV, Vladimir Volgaev, or Conspirator #1 apply for or receive a license or written authorization from the DDTC to export defense articles designated on the USML, including but not limited to Firearm Components #1-16.

8. At all times relevant to this Indictment, it was illegal to possess or attempt to possess any defense article with intent to export or transfer such defense article in violation of the AECA, that is, to export or attempt to export firearm components without a license or written authorization from the DDTC.

9. In addition, at all times relevant to this Indictment, no person could knowingly or willfully attempt, solicit, cause, or aid, abet, counsel, demand, induce, procure, or permit the commission of any act prohibited by

the AECA, that is, to export or attempt to export firearm components without a license or written authorization from the DDTC.

**B. The Conspiracy**

10. Beginning on an unknown date, but at least from on or about May 5, 2014, and continuing through on or about March 8, 2020, in the Middle District of Florida, Northern District of Georgia, and elsewhere, the defendant,

IHOR RADIONOV,

did knowingly and willfully combine, conspire, confederate, and agree with Vladimir Volgaev, Conspirator #1, and other persons, known and unknown to the Grand Jury, to willfully export and cause to be exported from the United States to a place outside thereof defense articles, that is, firearm components, without first obtaining from the DDTC a license or written authorization for such exports, in violation of 22 U.S.C. § 2778(b)(2) and (c), and 22 C.F.R. §§ 127(a)(1) and (5), and 127.1(e), and in violation of 18 U.S.C. §§ 554 and 2.

**C. Manner and Means**

11. The manner and means by which the conspirators sought to accomplish the objects of the conspiracy included, among others, the following:

a. It was part of the conspiracy that conspirators would and did acquire firearm components from sellers within the United States.

b. It was further part of the conspiracy that conspirators would and did share access to an online account that allowed them to bid on, purchase, and ship firearm components within the United States.

c. It was further part of the conspiracy that conspirators would and did arrange for the firearm components to be shipped to the Middle District of Florida and Northern District of Georgia.

d. It was further part of the conspiracy that conspirators would and did exchange emails, phone messages, and other electronic communications to coordinate the purchase, acquisition, and shipment of these firearm components.

e. It was further part of the conspiracy that conspirators would and did unlawfully ship the firearm components out of the United States.

f. It was further part of the conspiracy that conspirators would and did exchange funds to pay for the firearm components, as well as to pay commission fees to conspirators.

g. It was further part of the conspiracy that conspirators would and did fail to register with the DDTC as exporters or apply for export



licenses for firearm components as required by federal law.

h. It was further part of the conspiracy that conspirators would and did perform acts and make statements to misrepresent, hide, and conceal, and cause to be misrepresented, hidden, and concealed, the purpose of the conspiracy and the acts committed in furtherance thereof.

**D. Overt Acts**

12. In furtherance of the conspiracy, and to effect the objects thereof, the following overt acts, among others, were committed in the Middle District of Florida, Northern District of Georgia, and elsewhere:

a. On or about February 11, 2014, RADIONOV created an account (“the Account”) on an auction website that specialized in advertising the sale of firearms and firearm accessories (“the Website”).

b. On or about September 26, 2016, Conspirator #1 used the Account to bid on Firearm Component #1.

c. On or about September 28, 2016, Vladimir Volgaev emailed RADIONOV asking him to pay for Firearm Component #1.

d. On or about October 2, 2016, RADIONOV paid for Firearm Component #1 and had the item mailed to Vladimir Volgaev’s address in the Middle District of Florida.

e. Between on or about October 2 and 30, 2016, Conspirator #1 instructed Vladimir Volgaev to pay RADIONOV a commission fee for the purchase of Firearm Component #1.

f. Between on or about October 2 and 30, 2016, Vladimir Volgaev paid RADIONOV a commission fee for the purchase of Firearm Component #1.

g. On or about March 28, 2017, Conspirator #1 used the Account to bid on Firearm Components #2-8.

h. On or about March 28, 2017, Conspirator #1 emailed RADIONOV explaining that Conspirator #1 had bid on Firearm Components #2-8, and that RADIONOV would be compensated for purchasing those items.

i. On or about March 28 and 29, 2017, RADIONOV paid for Firearm Components #2-8 and had those items mailed to his address in the Northern District of Georgia.

j. On or about April 10, 2017, Conspirator #1 emailed RADIONOV asking when RADIONOV would mail Firearm Components #2-8 to Vladimir Volgaev.

k. On or about April 6, 2017, Conspirator #1 emailed RADIONOV offering to pay a \$300 commission fee to RADIONOV for the



purchase of \$2,500 worth of firearm components.

l. On or about April 6, 2017, RADIONOV emailed Conspirator #1 accepting the \$300 commission fee for the purchase of \$2,500 worth of firearm components.

m. On or about April 23, 2017, RADIONOV emailed Conspirator #1 an accounting of recent firearm component transactions, including payments received by RADIONOV and debt owed by Conspirator #1.

n. On or about May 2, 2017, RADIONOV emailed Conspirator #1 an accounting of recent firearm component transactions, including payments received by RADIONOV and debt owed by Conspirator #1.

o. On or about July 30, 2017, Conspirator #1 emailed RADIONOV requesting that RADIONOV purchase Firearm Component #9.

p. On or about July 30, 2017, RADIONOV used the Account to bid on Firearm Component #9.

q. On or about August 1, 2017, RADIONOV paid for Firearm Component #9 and had that item mailed to his address in the Northern District of Georgia.

- r. On or about June 20, 2018, Vladimir Volgaev emailed RADIONOV providing links to Firearm Components #10-11.
- s. On or about June 26, 2018, Conspirator #1 emailed RADIONOV instructing him to purchase Firearm Components #10-11.
- t. On or about July 4, 2018, RADIONOV used the Account to bid on Firearm Component #11.
- u. On or about July 4, 2018, RADIONOV paid for Firearm Component #11 and had the item mailed to Vladimir Volgaev's address in the Middle District of Florida.
- v. On or about October 13, 2018, Conspirator #1 emailed RADIONOV links to Firearm Components #12-14, which were listed for sale on the Website.
- w. On or about October 14, 2018, RADIONOV and Conspirator #1 used the Account to bid on Firearm Components #12-14.
- x. Between on or about October 14 and 17, 2018, RADIONOV paid for Firearm Components #12-14 and had those items mailed to Vladimir Volgaev's address in the Middle District of Florida.
- y. On or about October 16, 2018, Conspirator #1 emailed RADIONOV explaining that RADIONOV would be compensated for purchasing Firearm Components #12-14.

z. On or about October 22, 2018, RADIONOV emailed Conspirator #1 asking to be informed once Vladimir Volgaev received Firearm Components #12-14.

aa. On or about November 7, 2018, Vladimir Volgaev sent a message to RADIONOV stating that Vladimir Volgaev had received Firearm Components #12-13, and asking what additional items RADIONOV had purchased on the Website.

bb. On or about November 7, 2018, Vladimir Volgaev sent a message to RADIONOV stating that Vladimir Volgaev had received “everything” that RADIONOV had purchased on the Website, specifically, Firearm Components #12-14.

cc. On or about December 9, 2018, Conspirator #1 emailed RADIONOV asking if RADIONOV would purchase Firearm Components #15-16.

dd. On or about December 9, 2018, RADIONOV emailed Conspirator #1 agreeing to purchase Firearm Components #15-16.

ee. On or about December 9, 2018, Conspirator #1 used the Account to bid on Firearm Components #15-16.

ff. On or about December 9, 2018, RADIONOV paid for Firearm Components #15-16 and had the items mailed to Vladimir Volgaev’s

address in the Middle District of Florida.

gg. On or about January 17, 2019, federal agents in the Middle District of Florida seized Firearm Components #15-16 from Vladimir Volgaev.

All in violation of 18 U.S.C. § 371.

**COUNT TWO**  
**(International Traffic in Arms Regulations)**

13. The allegations contained in Count One of this Indictment are incorporated by reference as is fully set forth herein.

14. Beginning on an unknown date, but at least from on or about May 5, 2014, and continuing through on or about March 8, 2020, in the Middle District of Florida, Northern District of Georgia, and elsewhere, the defendant,

IHOR RADIONOV,

exported and attempted to export from the United States to a place outside thereof, defense articles, that is, firearm components, which were designated as defense articles on the USML, without having first obtained from the DDTC a license for such export or written authorization for such export; possessed and attempted to possess a defense article, that is, firearm components, which were designated as defense articles on the USML, with

intent to export or transfer such defense articles without having first obtained from the DDTC a license for such export or written authorization for such export; and solicited, caused, aided, abetted, counseled, demanded, induced, procured, and permitted the commission of any act prohibited by, and the omission of any act required by the AECA, that is, export and attempt to export, defense articles, that is, firearm components, which were designated as defense articles on the USML, without having first obtained from the DDTC a license for such export or written authorization for such export.

In violation of 22 U.S.C. § 2778(b)(2) and (c), and 22 C.F.R. §§ 127(a)(1) and (5), and 127.1(e).

**COUNT THREE**  
**(Smuggling)**

15. The allegations contained in Count One of this Indictment are incorporated by reference as if fully set forth herein.

16. Beginning on an unknown date, but at least from on or about May 5, 2014, and continuing through on or about March 8, 2020, in the Middle District of Florida, Northern District of Georgia, and elsewhere, the defendant,

IHOR RADIONOV,

aided and abetted by Vladimir Volgaev, Conspirator #1, and other persons,

known and unknown to the Grand Jury, fraudulently and knowingly exported and attempted to export and send from the United States to a place outside thereof defense articles, that is, firearm components, contrary to the AECA, a law and regulation of the United States, and received or purchased firearm components from the United States, prior to their exportation, knowing that the items were intended for exportation contrary to the AECA.

In violation of 18 U.S.C. §§ 554 and 2.

**FORFEITURE**

1. The allegations contained in Counts One through Three of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to the provisions of 18 U.S.C. § 981(a)(1)(C), 22 U.S.C. § 401, and 28 U.S.C. § 2461(c).

2. Upon conviction of the violation of 22 U.S.C. § 2278, or a conspiracy to violate 22 U.S.C. §2278 (18 U.S.C. § 371), the defendant,

IHOR RADIONOV,

shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense, and, pursuant to 22 U.S.C. § 401 and 28 U.S.C. § 2461, any arms or munitions of war or other articles attempted to be exported in violation of 22 U.S.C. § 2778 as alleged in Count



One, and any vessel, vehicle, or aircraft used in exporting or attempting to export such articles.

3. Upon conviction of the violation alleged in 18 U.S.C. § 554, the defendant,

IHOR RADIONOV,

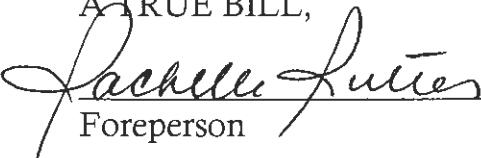
shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

4. The property to be forfeited includes, but is not limited to, the proceeds obtained from the offenses.

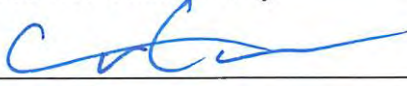
5. If any of the forfeitable assets described above, as a result of any act or omission of the defendant:

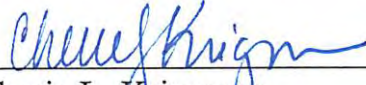
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property under the provisions of 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

A TRUE BILL,  
  
Foreperson

MARIA CHAPA LOPEZ  
United States Attorney

By:   
Carlton C. Gammons  
Assistant United States Attorney

By:   
Cherie L. Krigsman  
Assistant United States Attorney  
Chief, National Security and Cybercrime Section

No.

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**UNITED STATES DISTRICT COURT**  
Middle District of Florida  
Tampa Division

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THE UNITED STATES OF AMERICA

vs.

IHOR RADIONOV

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**INDICTMENT**

Violations: 18 U.S.C. §§ 371, 554, and 22 U.S.C. § 2778

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A true bill,

  
\_\_\_\_\_  
Foreperson

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Filed in open court this 6<sup>th</sup> day

of October, 2020.

\_\_\_\_\_  
Clerk

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Bail \$ \_\_\_\_\_

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