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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

April 2021 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

VLADIMIR GOHMAN,  
aka "Mike Maru,"  
BORIS POLOSIN,  
IGOR PANCHERNIKOV,  
aka "Mike Maru,"  
ELENA SHIFRIN,  
aka "Alexander Belov," and  
VLADIMIR PRIDACHA,

Defendants.

CR 2:21-cr-00259-AB

I N D I C T M E N T

[22 U.S.C. § 2778(b)(2), (c); 22  
C.F.R. §§ 121.1, 123.1,  
127.1(a)(4): Conspiracy to Violate  
the Arms Export Control Act; 18  
U.S.C. § 371: Conspiracy to Commit  
Offenses Against the United  
States; 18 U.S.C. § 981(a)(1)(C);  
28 U.S.C. § 2461(c): Forfeiture]

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

A. DEFENDANTS AND RELEVANT ENTITIES

At times relevant to this Indictment:

1. Defendant VLADIMIR GOHMAN, also known as ("aka") "Mike Maru" ("GOHMAN") was a citizen and resident of Israel.
2. Defendant BORIS POLOSIN ("POLOSIN") was a citizen and resident of Russia.

1           3.     Defendant IGOR PANCHERNIKOV, aka "Mike Maru"  
2 ("PANCHERNIKOV") was a citizen of Israel. Between at least 2016 and  
3 September 2018, PANCHERNIKOV resided at a house in Corona, California  
4 (the "Corona Residence"), within the Central District of California.

5           4.     Defendant ELENA SHIFRIN, aka "Alexander Belov" ("SHIFRIN")  
6 was a citizen of the United States and resided at a house in  
7 Mundelein, Illinois (the "Mundelein Residence").

8           5.     Defendant VLADIMIR PRIDACHA ("PRIDACHA") was a citizen of  
9 the United States and resided at a house in Volo, Illinois (the "Volo  
10 Residence").

11          6.     U.S. Company #1 was a company located in the United States  
12 that sold thermal imaging scopes. Thermal imaging scopes are  
13 designed to be mounted either on firearms or headgear and use heat-  
14 detection technology to enhance the visibility of heat-emitting  
15 objects in the dark.

16          7.     U.S. Company #2 was a company located in the United States  
17 that sold thermal imaging scopes.

18 B.     LAWS RESTRICTING THE EXPORT OF DEFENSE ARTICLES

19          8.     The Arms Export Control Act, Title 22, United States Code,  
20 Section 2778 ("AECA"), authorized the President of the United States  
21 to control the export of "defense articles" by designating certain  
22 items as defense articles and promulgating regulations for the import  
23 and export of such articles.

24          9.     Defense articles that were subject to such licensing  
25 requirements were designated on the United States Munitions List  
26 ("USML"), as set forth in the International Traffic in Arms  
27 Regulations, Title 22, Code of Federal Regulations, Parts 120-130  
28 ("ITAR"). Those designations were made by the United States

1 Department of State ("Department of State") with the concurrence of  
2 the United States Department of Defense ("Department of Defense").  
3 (22 U.S.C. § 2778(a)(1); 22 C.F.R. § 120.2.)

4 10. The AECA and ITAR required a person to apply for and obtain  
5 an export license from the Department of State's Directorate of  
6 Defense Trade Controls ("DDTC") before exporting defense articles, by  
7 any means, from the United States. (22 U.S.C. § 2778(b)(2); 22  
8 C.F.R. §§ 120.1, 120.17.)

9 11. Category XII of the USML included fire control, laser,  
10 imaging, and guidance equipment. Subsection (c)(2)(i) of Category  
11 XII of the USML included weapon sights or aiming or imaging systems,  
12 specially designed to mount to a weapon or withstand weapon shock or  
13 recoil, with or without an integrated viewer or display, and also  
14 incorporating an infrared focal plane array having a peak response  
15 wavelength exceeding 1,000 nanometers. (22 C.F.R. § 121.1.)

16 12. The following items were defense articles as defined by  
17 Category XII(c)(2)(i) of the USML:

- 18 a. Trijicon IR Hunter Mark III 60mm Thermal Riflescope,  
19 Part Number IRMK3-60;
- 20 b. Exelis/Harris AN/PSQ-20A Spiral Enhanced Night Vision  
21 Goggle;
- 22 c. BAE Systems UTCxii Universal Thermal Clip-On Sight;
- 23 d. BAE Systems SkeetIRx Micro Thermal Imaging Monocular,  
24 Serial Number 02525;
- 25 e. BAE Systems UTMx Thermal Monocular;
- 26 f. Trijicon Reap-IR 35mm Mini Thermal Riflescope, Serial  
27 Number 55091;
- 28 g. Skeet IR-L Micro Thermal Monocular;

1           h.    BAE Systems SkeetIRx Micro Thermal Imaging Monocular,  
2 Serial Number 02573;

3           i.    BAE Systems SkeetIRx Micro Thermal Imaging Monocular,  
4 Serial Number 02567; and

5           j.    Trijicon Reap-IR 60mm Mini Thermal Riflescope.

6           13. Defendants POLOSIN, GOHMAN, PANCHERNIKOV, SHIFRIN, and  
7 PRIDACHA did not apply for, receive, or possess a license to export  
8 or broker the export of defense articles from the United States.

9 C.    LAWS GOVERNING THE FILING OF ELECTRONIC EXPORT INFORMATION

10          14. The United States Department of Commerce required the  
11 filing of electronic export information ("EEI") through the Automated  
12 Export System for the export of commodities valued over \$2,500, and  
13 for any commodities requiring an export license, including defense  
14 articles. (13 U.S.C. § 305; 15 C.F.R. Part 30.)

15          15. The EEI was required to contain, among other information,  
16 the names and addresses of the parties to the transaction, and the  
17 description, quantity, and value of the items exported. (15 C.F.R.  
18 § 30.6(a).)

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1 COUNT ONE

2 [22 U.S.C. § 2778(b)(2), (c);

3 22 C.F.R. §§ 121.1, 123.1, 127.1(a)(4)]

4 A. OBJECT OF THE CONSPIRACY

5 16. The Grand Jury re-alleges and incorporates here paragraphs  
6 1 through 15 of the Introductory Allegations of this Indictment.

7 17. Beginning no later than on or about December 13, 2016, and  
8 continuing until at least on or about October 28, 2020, in Los  
9 Angeles County, within the Central District of California, and  
10 elsewhere, defendants VLADIMIR GOHMAN, also known as ("aka") "Mike  
11 Maru" ("GOHMAN"), BORIS POLOSIN ("POLOSIN"), IGOR PANCHERNIKOV, aka  
12 "Mike Maru" ("PANCHERNIKOV"), ELENA SHIFRIN, aka "Alexander  
13 Belov" ("SHIFRIN"), and VLADIMIR PRIDACHA ("PRIDACHA"), together with  
14 others known and unknown to the Grand Jury, conspired and agreed with  
15 each other to knowingly and willfully export from the United States  
16 to Russia defense articles that were covered by the United States  
17 Munitions List without first obtaining from the United States  
18 Department of State a valid license or other approval for such  
19 export, in violation of 22 U.S.C. § 2778(b)(2) and 22 C.F.R.  
20 §§ 121.1, 123.1, 127.1(a)(4).

21  
22 B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE  
23 ACCOMPLISHED

24 18. The object of the conspiracy was to be accomplished, in  
25 substance, as follows:

26 a. Defendant POLOSIN would direct defendant GOHMAN to  
27 purchase defense articles, namely, thermal riflescopes, weapons  
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1 sights, monoculars, and night-vision goggles, from online sellers in  
2 the United States.

3           b. Defendant POLOSIN would direct defendant GOHMAN to  
4 have the defense articles exported to Russia with the contents of the  
5 exports falsely described as non-export-controlled items with a value  
6 of less than \$2,500.

7           c. Defendant GOHMAN would purchase defense articles from  
8 online sellers in the United States and direct the sellers to mail  
9 the thermal riflescopes to defendants PANCHERNIKOV, PRIDACHA, or  
10 SHIFRIN.

11           d. Defendant GOHMAN would instruct defendants  
12 PANCHERNIKOV and SHIFRIN to export defense articles to Russia and to  
13 falsely describe the contents of the exports as non-export-controlled  
14 items with a value of less than \$2,500. Defendant GOHMAN would  
15 further instruct defendant SHIFRIN to use false sender names and  
16 false sender addresses when exporting such items to Russia.

17           e. Defendant PANCHERNIKOV would mail defense articles to  
18 co-conspirators in Russia without obtaining the required export  
19 licenses or filing EEI and would falsely describe the contents of the  
20 exports as non-export-controlled items with a value of less than  
21 \$2,500.

22           f. Defendant PANCHERNIKOV would mail defense articles to  
23 defendant SHIFRIN to export to Russia.

24           g. Defendant PRIDACHA would deliver defense articles to  
25 defendant SHIFRIN to export to Russia.

26           h. Defendant SHIFRIN would mail defense articles to  
27 defendant POLOSIN and other co-conspirators in Russia without  
28 obtaining the required export licenses or filing EEI and would

1 falsely describe the contents of the exports as non-export-controlled  
2 items with a value of less than \$2,500.

3 C. OVERT ACTS

4 19. On or about the following dates, in furtherance of the  
5 conspiracy and to accomplish its object, defendants GOHMAN, POLOSIN,  
6 PANCHERNIKOV, SHIFRIN, and PRIDACHA, and others known and unknown to  
7 the Grand Jury, committed various overt acts within the Central  
8 District of California, and elsewhere, including, but not limited to,  
9 the following:

10 Overt Act No. 1: On December 9, 2016, defendant GOHMAN  
11 ordered a Trijicon IR Hunter Mark III 60mm Thermal Riflescope, Part  
12 Number IRMK3-60 from U.S. Company #1 and directed U.S. Company #1 to  
13 deliver the item to "Elena" at the Mundelein Residence.

14 Overt Act No. 2: On December 13, 2016, defendant GOHMAN sent  
15 e-mails to a representative of U.S. Company #1 in which he identified  
16 himself as "Mike Maru," asked to purchase a thermal riflescope,  
17 stated that he could pay upfront because he had "received assurances  
18 from Boris," and stated that he was in the United States in the  
19 "Chicago area."

20 Overt Act No. 3: On January 13, 2017, defendant GOHMAN  
21 purchased a BAE OASYS Thermal Mono X Thermal Imaging Device from an  
22 online seller for \$9,000 and directed the seller to deliver the item  
23 to defendant PANCHERNIKOV at the Corona Residence.

24 Overt Act No. 4: On January 15, 2017, defendant GOHMAN  
25 purchased an Exelis/Harris AN/PSQ-20A Spiral Enhanced Night Vision  
26 Goggle from an online seller for \$15,000 and directed the seller to  
27 deliver the item to defendant PANCHERNIKOV at the Corona Residence.

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1           Overt Act No. 5:       On January 27, 2017, defendant POLOSIN  
2 ordered two thermal riflescopes from U.S. Company #1 for \$13,229.

3           Overt Act No. 6:       On January 30, 2017, defendant POLOSIN sent  
4 an e-mail to a representative for U.S. Company #1, stating that  
5 defendant PANCHERNIKOV was his friend and would pay for the thermal  
6 riflescopes that defendant POLOSIN had ordered, and that the items  
7 should be sent to defendant PANCHERNIKOV at the Corona Residence.

8           Overt Act No. 7:       On May 1, 2017, defendant GOHMAN purchased a  
9 BAE Systems UTCxii Universal Thermal Clip-On Sight from U.S. Company  
10 #1 for \$20,910 and directed U.S. Company #1 to deliver the item to  
11 defendant PANCHERNIKOV at the Corona Residence.

12           Overt Act No. 8:       On May 22, 2017, defendant GOHMAN sent  
13 defendants POLOSIN and PANCHERNIKOV e-mails containing instructions  
14 to ship a package to "Sotnikova Valentina" at an address on  
15 Stavropolskaya Street in Moscow, Russia (the "Stavropolskaya  
16 Address"), and to list the items in the package as "women's clothes  
17 and shoes."

18           Overt Act No. 9:       On May 24, 2017, defendant GOHMAN purchased  
19 a Skeet IR-X thermal rifle scope from U.S. Company #1 for \$14,144 and  
20 directed U.S. Company #1 to deliver the item to defendant  
21 PANCHERNIKOV at the Corona Residence.

22           Overt Act No. 10:    On June 13, 2017, defendant GOHMAN sent  
23 defendant POLOSIN an e-mail containing as an attachment a pre-paid  
24 shipping label listing the sender as defendant PANCHERNIKOV at the  
25 Corona Residence, the recipient as "Olga Puzakova" at an address on  
26 Vysotniy Street in Moscow, Russia (the "Vysotniy Address"), and the  
27 items as "women's clothes and shoes."

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1           Overt Act No. 11:    On June 13, 2017, defendant GOHMAN sent  
2 defendants POLOSIN and PANCHERNIKOV an e-mail containing as an  
3 attachment a revised pre-paid shipping label listing the sender as  
4 "Mike Maru," the recipient as "Olga Puzakova" at the Vysotniy  
5 Address, and the items as "women's clothes and shoes."

6           Overt Act No. 12:    On June 13, 2017, defendant PANCHERNIKOV  
7 exported a package with a pre-paid shipping label that defendant  
8 GOHMAN had sent him earlier that day to "Olga Puzakova" at the  
9 Vysotniy Address, using the alias "Mike Maru" and listing the  
10 contents as "Women Clothes; 1 Women Shoes; 1 Women Bag," with a value  
11 of \$426.

12           Overt Act No. 13:    On June 14, 2017, defendant PANCHERNIKOV  
13 conducted the following Internet searches: (1) "how to get ITAR  
14 certification"; (2) "what does it mean to be ITAR compliant";  
15 (3) "what is ITAR regulations"; and (4) "What is Arms Export Control  
16 Act?"

17           Overt Act No. 14:    On June 27, 2017, defendant GOHMAN purchased  
18 a BAE Systems SkeetIRx Micro Thermal Imaging Monocular, Serial Number  
19 02525 from an online seller for \$13,521 and directed the seller to  
20 ship the item to defendant PANCHERNIKOV at the Corona Residence.

21           Overt Act No. 15:    On August 26, 2017, defendant GOHMAN ordered  
22 a BAE Systems UTMx Universal Thermal Monocular from an online seller  
23 for \$4,000 and directed the seller to ship the item to defendant  
24 PANCHERNIKOV at the Corona Residence.

25           Overt Act No. 16:    On September 2, 2017, defendant GOHMAN  
26 ordered a BAE Systems UTMx Universal Thermal Monocular from an online  
27 seller for \$5,000 and directed the seller to ship the item to  
28 defendant PANCHERNIKOV at the Corona Residence.

1           Overt Act No. 17:    On September 5, 2017, defendant GOHMAN  
2 ordered two BAE Systems UTMx Universal Thermal Monoculars from an  
3 online seller for \$9,250 and directed the seller to ship the items to  
4 defendant PANCHERNIKOV at the Corona Residence.

5           Overt Act No. 18:    On September 18, 2017, defendant GOHMAN sent  
6 defendant PANCHERNIKOV an e-mail containing as an attachment a  
7 shipping label to ship a package from the Corona Residence to the  
8 Mundelein Residence.

9           Overt Act No. 19:    On September 18, 2017, defendant  
10 PANCHERNIKOV shipped a package to the Mundelein Residence containing  
11 a shipping label that defendant GOHMAN had e-mailed to him earlier  
12 that day.

13           Overt Act No. 20:    On October 2, 2017, defendant GOHMAN sent an  
14 e-mail to defendant PANCHERNIKOV containing as an attachment a  
15 prepopulated shipping label to ship a package from the Corona  
16 Residence to defendant GOHMAN at the Mundelein Residence.

17           Overt Act No. 21:    On October 5, 2017, defendant PANCERHNIKOV  
18 shipped to the Mundelein Residence a package bearing a shipping label  
19 that defendant GOHMAN had sent to defendant PANCHERNIKOV on October  
20 2, 2017.

21           Overt Act No. 22:    On October 13, 2017, an unknown co-  
22 conspirator exported a package to "Julia Polosina" at an address on  
23 Novorossiyskaya Street in Moscow, Russia (the "Novorossiyskaya  
24 Address"), using the alias "Debra Stout" and listing the shipper's  
25 address as 626 West Sycamore Street, Vernon Hills, Illinois (the  
26 "Sycamore Address").

27           Overt Act No. 23:    On November 7, 2017, defendant GOHMAN bought  
28 a Reap-IR 35 mm Mini Thermal Riflescope from an online seller and

1 directed the seller to deliver the item to defendant PANCHERNIKOV at  
2 the Corona Residence.

3 Overt Act No. 24: On November 15, 2017, defendant GOHMAN sent  
4 an e-mail to defendant PANCHERNIKOV containing as an attachment a  
5 prepopulated shipping label to ship a package from the Corona  
6 Residence to defendant GOHMAN at the Mundelein Residence.

7 Overt Act No. 25: On November 18, 2017, defendant PANCHERNIKOV  
8 mailed a package addressed to defendant GOHMAN at the Mundelein  
9 Residence using a pre-paid shipping label that defendant GOHMAN sent  
10 on November 15, 2017.

11 Overt Act No. 26: On November 20, 2017, defendant GOHMAN  
12 bought a thermal riflescope from an online seller for \$3,700 and  
13 directed the seller to ship the item to the Corona Residence. On the  
14 same date, the eBay seller e-mailed GOHMAN, "This is an ITAR item and  
15 must stay in the US," and defendant GOHMAN replied, "Sure stay in  
16 US."

17 Overt Act No. 27: On November 23, 2017, defendant GOHMAN  
18 bought one PVS 15 night-vision binocular omni VII Thin Film Autogated  
19 PEQ from an online seller for \$7,500 and directed the seller to ship  
20 the item to defendant PANCHERNIKOV at the Corona Residence.

21 Overt Act No. 28: On November 25, 2017, defendant GOHMAN e-  
22 mailed defendant POLOSIN a purchase receipt for a PVS 15 night-vision  
23 device he bought on November 23, 2017.

24 Overt Act No. 29: On November 27, 2017, defendant POLOSIN e-  
25 mailed defendant GOHMAN shipping labels to ship two packages to the  
26 Stavropolskaya Address with the contents listed as (1) "Children  
27 cloth - 1 set (187 usd) Spare parts - 1 set (59 usd) Pelican  
28 Case#1200(empty) - 1 pcs (42 usd) Women cloth - 1 pcs (82 usd)," and

1 (2) "PorterCable 6 Tool Combo Kit - 1 pcs (259 usd);" and a shipping  
2 label to ship a third package to the Vysotniy Address with the  
3 contents listed as "PorterCable 6 Tool Combo Kit - 1 pcs (259 usd)."

4 Overt Act No. 30: On November 27, 2017, an unknown co-  
5 conspirator exported three packages to Russia that purported to  
6 contain the same items that defendant POLOSIN had listed in an e-mail  
7 that was sent to defendant GOHMAN earlier that day, including: one to  
8 the Stavropolskaya Address, which listed the sender as "Vladimir  
9 Gohman" and the sender's address as the Mundelein Address; one to the  
10 Stavropolskaya Address, which listed the sender as "Debra Stout," an  
11 alias, and the sender's address as the Sycamore Address; and one to  
12 the Vysotniy Address, which listed the sender as "Debra Stout," an  
13 alias, and the sender's address as the Sycamore Address.

14 Overt Act No. 31: On November 27, 2017, defendant PANCHERNIKOV  
15 purchased a Trijicon Reap-IR 35mm Mini Thermal Riflescope, Serial  
16 Number 55091, for \$6,400 from U.S. Company #1 and directed U.S.  
17 Company #1 to ship the item to the Corona Residence.

18 Overt Act No. 32: On December 12, 2017, defendant PANCHERNIKOV  
19 purchased a BAE Systems Skeet IR-L Micro Thermal Monocular for \$8,000  
20 from U.S. Company #1 and directed U.S. Company #1 to ship the item to  
21 the Corona Residence.

22 Overt Act No. 33: On December 16, 2017, defendant POLOSIN  
23 directed defendant GOHMAN to purchase an AN-PAS-13D Heavy Weapon  
24 Thermal Sight from an online seller.

25 Overt Act No. 34: On December 17, 2017, defendant GOHMAN  
26 purchased an AN-PAS-13D Heavy Weapon Thermal Sight from an online  
27 seller and directed the seller to ship the item to the Mundelein  
28 Residence. In connection with that purchase, defendant GOHMAN signed

1 a Statement of Understanding in which he provided a false Illinois  
2 Driver's License, falsely stated that he was a United States citizen,  
3 and stated that he would not sell or trade the item to any non-U.S.  
4 citizen, would not export the item from the United States, and would  
5 comply with ITAR regulations.

6 Overt Act No. 35: On December 20, 2017, defendant PANCHERNIKOV  
7 purchased a BAE Systems SkeetIRx Micro Thermal Imaging Monocular,  
8 Serial Number 02573, for \$12,647.61 from U.S. Company #1 and directed  
9 U.S. Company #1 to ship it to the Corona Residence.

10 Overt Act No. 36: On December 21, 2017, defendant POLOSIN e-  
11 mailed defendant GOHMAN instructions to ship one package to "Polosina  
12 Yuliya" at the Vysotniy Address, and a second package to "Arina  
13 Shamsutdinova" at the Stavropolskaya Address, and to list the  
14 contents as a Porter-Cable Kit, Celestron Telescope, and "Spare Parts  
15 Kit."

16 Overt Act No. 37: On December 21, 2017, an unknown co-  
17 conspirator exported: one package to "Polosina Yuliya" at the  
18 Vysotniy Address, which listed the sender as "Pol Graune," an alias,  
19 and the sender's address as the Sycamore Address; and a second  
20 package to "Arina Shamsutdinova" at the Stavropolskaya Address, which  
21 listed the sender as "Jonn Moran," an alias, and the sender's address  
22 as 198 Lakeview Parkway, Vernon Hills, Illinois. On both packages,  
23 the unknown co-conspirator listed the items in the packages as the  
24 same items that defendant POLOSIN had listed in an e-mail that  
25 defendant POLOSIN sent to defendant GOHMAN earlier on December 21,  
26 2017.

27 Overt Act No. 38: On December 26, 2017, defendant PANCHERNIKOV  
28 purchased a BAE Systems SkeetIRx Micro Thermal Imaging Monocular,

1 Serial Number 02567, for \$14,247.07 from U.S. Company #1 and directed  
2 U.S. Company #1 to ship it to the Corona Residence.

3 Overt Act No. 39: On December 29, 2017, defendant GOHMAN e-  
4 mailed defendant PANCHERNIKOV a shipping label to ship a package from  
5 the Corona Residence to the Mundelein Residence.

6 Overt Act No. 40: On January 2, 2018, defendant PANCHERNIKOV  
7 shipped a package from the Corona Residence to the Mundelein  
8 Residence.

9 Overt Act No. 41: On January 5, 2018, defendant GOHMAN e-  
10 mailed defendant SHIFRIN the following instructions for sending  
11 packages, using aliases, to three addresses in Moscow, Russia:  
12 (1) from "Alex Brown" at 687 N. Milwaukee Ave, Vernon Hills, Illinois  
13 (the "Milwaukee Address") to "Olga Puzakova" at the Novorossiyskaya  
14 Address, with the contents listed as "Children cloth and Blender";  
15 (2) from "John Mayer" at the Milwaukee Address to "Olga Sotnikova" at  
16 the Vysotniy Address, with the contents listed as "Manual tool  
17 Pacific"; and (3) from "John Mayer" at the Milwaukee Address to Arina  
18 Shamsutdinova at the Stavropolskaya Address, with the contents listed  
19 as "Celestron telescope and spare parts."

20 Overt Act No. 42: On January 8, 2018, an unknown co-  
21 conspirator exported three packages containing the same sender,  
22 recipient, and content descriptions that defendant GOHMAN had e-  
23 mailed to defendant SHIFRIN on January 5, 2018.

24 Overt Act No. 43: On February 10, 2018, defendant GOHMAN  
25 purchased an L3 PVS 31 night-vision device from an online seller for  
26 \$17,000 and directed the seller to deliver the item to defendant  
27 PANCHERNIKOV at the Corona Residence.

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1           Overt Act No. 44:    On February 14, 2018, defendant GOHMAN e-  
2 mailed defendant PANCHERNIKOV shipping labels to send packages from  
3 the Corona Residence to the Mundelein Residence.

4           Overt Act No. 45:    On February 18, 2018, defendant PANCHERNIKOV  
5 sent a package to the Mundelein Residence with a shipping label  
6 defendant GOHMAN had provided him.

7           Overt Act No. 46:    On February 21, 2018, defendant PANCHERNIKOV  
8 sent a package to the Mundelein Residence with a shipping label  
9 defendant GOHMAN had provided him.

10          Overt Act No. 47:    On February 21, 2018, defendant GOHMAN e-  
11 mailed defendant SHIFRIN instructions to ship items, using aliases,  
12 to two addresses in Moscow, Russia, specifically: (1) from "John  
13 Mayer" at the Milwaukee Address to "Sotnikova Valentina" at the  
14 Stavropolskaya Address, with the contents listed as "PorterCable 6  
15 Tool Combo Kit - 1 pcs (269 usd)"; and (2) from "Alex Brown" at the  
16 Milwaukee Address to "Puzakova Olga" at the Novorossiyskaya Address,  
17 with the contents listed as "PorterCable 6 Tool Combo Kit - 1 pcs  
18 (269 usd)."

19          Overt Act No. 48:    On February 22, 2018, an unknown co-  
20 conspirator exported a package to "Olga Puzakova" at the  
21 Novorossiyskaya Address, which listed the sender as "Alex Brown," an  
22 alias, the sender's address as the Milwaukee Address, and the  
23 contents as a "Porter Cable 6 Tool Combo Kit."

24          Overt Act No. 49:    On February 22, 2018, defendant POLOSIN e-  
25 mailed defendant GOHMAN instructions to ship items, using aliases, to  
26 two addresses in Moscow, Russia, specifically: (1) from "John Mayer"  
27 at the Milwaukee Address to "Sotnikova Olga" at the Vysotniy Address,  
28 with the contents listed as "Kitchen accessories - 1 set (82 usd)

1 Women cloth - 1 set (246 usd) Women shoes - 1 pair (149 usd)"; and  
2 (2) from "Alex Brown" at the Milwaukee Address to "Polosina Yuliya"  
3 at the Novorossiyskaya Address, with the contents listed as  
4 "PorterCable 6 Tool Combo Kit - 1 pcs (269 usd)."

5 Overt Act No. 50: On February 23, 2018, defendant GOHMAN e-  
6 mailed defendant SHIFRIN the same shipping instructions that  
7 defendant POLOSIN had e-mailed to defendant GOHMAN the previous day.

8 Overt Act No. 51: On February 24, 2018, an unknown co-  
9 conspirator exported a package to "Yuliya Polosina" at the  
10 Novorossiyskaya Address, which listed the sender as "Alex Brown," an  
11 alias, the sender's address as the Milwaukee Address, and the  
12 contents as a "Porter Cable Tool Kit."

13 Overt Act No. 52: On February 24, 2018, an unknown co-  
14 conspirator exported a package to "Olga Sotnikova" at the Vysotniy  
15 Address, which listed the sender as "John Mayer," an alias, and the  
16 contents as "Kitchen Accessories, Women Clothes, Women Shoes."

17 Overt Act No. 53: On February 24, 2018, an unknown co-  
18 conspirator exported a package to "Olga Sotnikova" at the Vysotniy  
19 Address, which listed the sender as "John Mayer", an alias, the  
20 sender's address as the Milwaukee Address, and the contents as  
21 "Kitchen Accessories."

22 Overt Act No. 54: On February 25, 2018, defendant POLOSIN e-  
23 mailed defendant GOHMAN a weblink to an L3 Eotech GPNVG 18 Night  
24 Vision Goggle that was being offered for sale by an online seller.

25 Overt Act No. 55: On February 26, 2018, defendant GOHMAN  
26 offered to purchase an L3 Eotech GPNVG 18 Night Vision Goggle from an  
27 online seller, and the online seller requested that defendant GOHMAN  
28 contact the seller on an encrypted mobile messaging application.



1           Overt Act No. 56:    On March 3, 2018, defendant GOHMAN e-mailed  
2 defendant PANCHERNIKOV a shipping label to send a package from the  
3 Corona Residence to defendant GOHMAN at the Mundelein Residence.

4           Overt Act No. 57:    On March 5, 2018, defendant PANCHERNIKOV  
5 shipped a package to the Mundelein Residence containing a shipping  
6 label that defendant GOHMAN had e-mailed to him on March 3, 2018.

7           Overt Act No. 58:    On March 9, 2018, defendant POLOSIN e-mailed  
8 defendant GOHMAN instructions to ship a package to "Polosin  
9 Alexander" at the Stavropolskaya Address, and to list the contents of  
10 the package as a "Porter Cable Kit."

11           Overt Act No. 59:    On March 9, 2018, defendant GOHMAN e-mailed  
12 defendant SHIFRIN the same instructions that defendant POLOSIN had  
13 sent him earlier that day.

14           Overt Act No. 60:    On March 10, 2018, an unknown co-conspirator  
15 exported a package to "Alexander Polosin" at the Stavropolskaya  
16 Address, which listed the sender as "John Mayer," an alias, the  
17 sender's address as 101 Bunker Court, Vernon Hills, Illinois, and the  
18 contents as "Porter Cable 6 Tool."

19           Overt Act No. 61:    On May 8, 2018, defendant GOHMAN purchased a  
20 New Insight Technology AN/PSQ 20B ENVG Night Vision and Thermal  
21 riflescope from an online seller for \$17,900 and directed the seller  
22 to ship the item to defendant GOHMAN at the Corona Residence.

23           Overt Act No. 62:    On May 14, 2018, defendant GOHMAN e-mailed  
24 defendant PANCHERNIKOV a shipping label to send a package from the  
25 Corona Residence to defendant GOHMAN at the Mundelein Residence.

26           Overt Act No. 63:    On May 16, 2018, defendant PANCHERNIKOV  
27 shipped a package to the Mundelein Residence containing a shipping  
28 label that defendant GOHMAN had e-mailed to him on May 14, 2018.

1           Overt Act No. 64:    On May 17, 2018, defendant GOHMAN e-mailed  
2 defendant SHIFRIN instructions to ship items to two addresses in  
3 Moscow, Russia, specifically: (1) "Polosina Lidiya" at the Vysotniy  
4 Address; and (2) "Sotnikova Valentina" at an address on Ostapovskiy  
5 Street (the "Ostapovskiy Address").

6           Overt Act No. 65:    On May 18, 2018, an unknown co-conspirator  
7 exported a package to "Lidiya Polosina" at the Vysotniy Address,  
8 which listed the sender as "Igor Semenov," an alias, and the sender's  
9 address as 172 Trade Street, Lexington, Kentucky (the "Trade Street  
10 Address").

11           Overt Act No. 66:    On May 19, 2018, an unknown co-conspirator  
12 exported a package to defendant POLOSIN at the Novorossiyskaya  
13 Address, which listed the sender as "Igor Sokolov," an alias, and the  
14 sender's address as the Trade Street Address.

15           Overt Act No. 67:    On September 10, 2018, defendant POLOSIN e-  
16 mailed defendant GOHMAN weblinks to an IR-Hunter Mark III 60mm  
17 Thermal Riflescope and a Reap-IR 35mm Mini Thermal Riflescope, both  
18 of which were being offered for sale by online sellers.

19           Overt Act No. 68:    On September 10, 2018, defendant GOHMAN  
20 purchased from an online seller an IR-Hunter Mark III 60mm Thermal  
21 Riflescope for \$8,500, forwarded the purchase receipt to defendant  
22 POLOSIN, and directed the seller to ship the item to the Volo  
23 Residence.

24           Overt Act No. 69:    On September 14, 2018, defendant POLOSIN e-  
25 mailed defendant GOHMAN: (1) a picture of a carrying case for an IR-  
26 Hunter Mark III 60mm Thermal Riflescope; (2) instructions to separate  
27 the riflescope from the carrying case and to conceal the riflescope  
28 in a shipment among other items; and (3) instructions to ship a

1 package to the Novorossiyskaya Address, with the contents listed as  
2 shoes, accessories, and spare parts, with a total value of less than  
3 \$400.

4 Overt Act No. 70: On September 14, 2018, defendant GOHMAN e-  
5 mailed to defendant SHIFRIN the same picture and shipping  
6 instructions that defendant POLOSIN had sent him earlier that day.

7 Overt Act No. 71: On September 15, 2018, an unknown co-  
8 conspirator exported a package to "Olga Puzakova" at the  
9 Novorossiyskaya Address, which listed the sender as "Irina Semenova,"  
10 an alias, the sender's address as the Trade Street Address, and the  
11 contents as "Spare Parts Set" with a total value of \$319.

12 Overt Act No. 72: On November 14, 2018, defendant GOHMAN  
13 purchased ANVIS 10 night-vision goggles from an online seller for  
14 \$6,850, and a REAP-IR 35-2 thermal riflescope from an online seller  
15 for \$6,250.

16 Overt Act No. 73: On November 23, 2018, defendant POLOSIN e-  
17 mailed defendant GOHMAN instructions to: (1) ship one package that  
18 day to the Novorossiyskaya Address and a second package the next day  
19 to the Vysotniy Address; (2) conceal a REAP-IR 35-2 thermal  
20 riflescope inside a carrying case for a Porter-Cable Kit; and  
21 (3) list the items in the first package as "PorterCable 6 Tool Combo  
22 Kit - 1 pcs (264 usd), Spare parts kit - 1 pcs (167 usd)" and the  
23 items in the second package as "Women cloth - 1 set (\$188)  
24 PorterCable Grinder - 1 pcs (\$116) Child cloth - 1 set (\$84) Men  
25 cloth - 1 set (\$142)."

26 Overt Act No. 74: On November 23, 2018, defendant GOHMAN  
27 forwarded an e-mail containing shipping instructions from defendant  
28 POLOSIN to defendant SHIFRIN.

1           Overt Act No. 75:    On November 23, 2018, an unknown co-  
2 conspirator exported a package to "Olga Sotnikova" at the  
3 Novorossiyskaya Address, which listed the sender as "Irina Miller,"  
4 an alias, the sender's address as the Trade Street Address, and the  
5 contents as "Porter Cable 6 Tool Combo Kit, Spare Parts Kit" with a  
6 total value of \$431.

7           Overt Act No. 76:    On November 24, 2018, an unknown co-  
8 conspirator exported a package to "Lida Polosina" at the Vysotniy  
9 Address, which listed the sender as "Oleg Semenov," an alias, the  
10 sender's address as the Trade Street Address, and the contents as  
11 "Women Cloth" with a total value of \$530.

12           Overt Act No. 77:    On December 8, 2018, defendant GOHMAN  
13 purchased an L3 AN/PVS-31A night-vision device for \$17,500 from an  
14 online seller and directed the seller to ship the item to "Vladimir  
15 Gohman (Pridacha)" at the Volo Residence.

16           Overt Act No. 78:    On December 24, 2018, defendant POLOSIN e-  
17 mailed defendant GOHMAN instructions to ship one package to defendant  
18 POLOSIN at an address on Sovhoznaya Street in Moscow, Russia (the  
19 "Sovhoznaya Address") with the contents listed as "Porter Cable Kit,"  
20 and a second package to "Shamsutdinova Arina" at the Novorossiyskaya  
21 Address with the contents listed as "PorterCable Grinder, Women  
22 cloth, Child cloth, Men Boots."

23           Overt Act No. 79:    On December 24, 2018, defendant GOHMAN  
24 forwarded to defendant SHIFRIN an e-mail from defendant POLOSIN  
25 containing shipping instructions.

26           Overt Act No. 80:    On December 24, 2018, an unknown co-  
27 conspirator exported: one package to defendant POLOSIN at the  
28 Sovhoznaya Address, which listed the sender as "Irina Semenova," an

1 alias, and the sender's address as the Trade Street Address; and a  
2 second package to "Arina Shamsutdinova" at the Novorossiyskaya  
3 Address, which listed the sender as "Lera Ivanova," an alias, and the  
4 sender's address as the Trade Street Address.

5 Overt Act No. 81: On December 26, 2018, defendant GOHMAN  
6 purchased from U.S. Company #1 a Reap-IR 35-millimeter mini thermal  
7 riflescope for \$6,800 and directed U.S. Company #1 to ship the item  
8 to "Vladimir Gohman (Pridacha)" at the Volo Residence.

9 Overt Act No. 82: On December 26, 2018, defendant GOHMAN sent  
10 U.S. Company #1 an Export Statement of Understanding that contained  
11 defendant PRIDACHA's name typed in three places and signed in one  
12 place, and which stated, among other things, that defendant PRIDACHA  
13 was a United States Citizen, was aware of the restrictions imposed by  
14 the ITAR, was aware that "all night vision equipment systems, lasers,  
15 components, goggles, and weapon sights of Generation 2, 2+, and 3, as  
16 well as infrared artifacts, illuminators and aimers, are currently  
17 identified as U.S. Munitions items," and was aware that "For thermal  
18 imaging equipment, one is not required to be a US citizen but cannot  
19 export out of the United States."

20 Overt Act No. 83: On January 3, 2019, defendant PRIDACHA  
21 received a Reap-IR 35-millimeter mini thermal riflescope at the Volo  
22 Residence and signed a delivery receipt using the name "Goham."

23 Overt Act No. 84: On January 14, 2019, defendant POLOSIN e-  
24 mailed defendant GOHMAN instructions to ship one package to "Polosina  
25 Lidia" at the Sovhoznaya Address and to list the contents as "Women  
26 cloth - 1 set (\$77) Child cloth - 1 set (\$39) Men boots - 1 pcs  
27 (\$119) PorterCable Grinder and Saw," and to ship a second package to  
28

1 the Ostapovskiy Address and to list the contents as "PorterCable 8  
2 Tool Combo Kit."

3 Overt Act No. 85: On January 14, 2019, defendant GOHMAN  
4 forwarded to defendant SHIFRIN an e-mail from defendant POLOSIN  
5 containing shipping instructions.

6 Overt Act No. 86: On January 15, 2019, an unknown co-  
7 conspirator exported a package to "Polosin Alexander" at the  
8 Ostapovskiy Address, which listed the sender as "Irine Ivanov," an  
9 alias, and the sender's address as the Trade Street Address.

10 Overt Act No. 87: On March 21, 2019, defendant GOHMAN  
11 purchased a Reap-IR 35-millimeter mini thermal riflescope from U.S.  
12 Company #1 for \$6,800 and directed U.S. Company #1 to ship the item  
13 to the Volo Residence.

14 Overt Act No. 88: On March 22, 2019, defendant GOHMAN signed  
15 and returned to U.S. Company #1 an Export Statement of Understanding  
16 which stated, among other things, that defendant GOHMAN was a United  
17 States Citizen, was aware of the restrictions imposed by the ITAR,  
18 and was aware that "all night vision equipment systems, lasers,  
19 components, goggles, and weapon sights of Generation 2, 2+, and 3, as  
20 well as infrared artifacts, illuminators and aimers, are currently  
21 identified as U.S. Munitions items."

22 Overt Act No. 89: On April 1, 2019, defendant PRIDACHA  
23 received a Reap-IR 35-millimeter mini thermal riflescope at the Volo  
24 Residence and signed the delivery receipt using the name "Vladimir  
25 Gohman."

26 Overt Act No. 90: On April 1, 2019, defendant POLOSIN e-mailed  
27 defendant GOHMAN instructions to ship an item to the Sovhoznaya  
28 Address and to list the contents as a tool kit with a value of \$461.

1           Overt Act No. 91:    On April 1, 2019, defendant GOHMAN e-mailed  
2 defendant SHIFRIN a document titled "declar 04-01-19" containing  
3 instructions to ship an item to the Sovhoznaya Address and to list  
4 the contents as a tool kit with a value of \$461.

5           Overt Act No. 92:    On April 2, 2019, an unknown co-conspirator  
6 exported a package to defendant POLOSIN at the Sovhoznaya Address,  
7 which listed the sender as "Lena Ivanova," an alias, the sender's  
8 address as the Trade Street Address, and the contents as "Rancher  
9 Cutting Kit, LachMiller Manual" with a value of \$461.

10          Overt Act No. 93:    On April 16, 2019, defendant SHIFRIN  
11 attempted to export a package containing a carrying case for a Reap-  
12 IR 35-millimeter thermal riflescope, as well as lithium ion batteries  
13 used to operate thermal riflescopes, to the Novorossiyskaya Address,  
14 listing the sender as "Lena Ivanov," an alias, the sender's address  
15 as the Trade Street Address, and the contents as "Women clothing, 1  
16 set," "Porter Cable Grinder," "Hair care set," and "Child clothing,"  
17 with a total value of \$410.

18          Overt Act No. 94:    On May 15, 2019, defendant POLOSIN e-mailed  
19 defendant GOHMAN a weblink to an AN/PAS 13G Thermal Weapons Sight  
20 that was being offered for sale by an online seller.

21          Overt Act No. 95:    On May 15, 2019, defendant GOHMAN purchased  
22 an AN/PAS 13G Thermal Weapons Sight from an online seller for \$6,200  
23 and directed the seller to ship the item to defendant PRIDACHA at the  
24 Volo Residence.

25          Overt Act No. 96:    On May 19, 2019, defendant GOHMAN e-mailed  
26 defendant SHIFRIN instructions to ship a package to defendant POLOSIN  
27 at the Sovhoznaya Address and to list the sender as "Julya Miller,"  
28

1 at an address in Wheeling, Illinois, and the contents as "PorterCable  
2 6 Tool Combo Kit - 1 pcs (286 usd)."

3 Overt Act No. 97: On May 20, 2019, an unknown co-conspirator  
4 exported a package to the Sovhoznaya Address, which listed the sender  
5 as "Julya Miller," an alias, the sender's address as 850 Corey Lane,  
6 Apartment 12C, Wheeling, Illinois (the "Corey Lane Address"), and the  
7 contents as "6 Piece Tool Kit" with a value of \$286.

8 Overt Act No. 98: On June 9, 2019, defendant GOHMAN purchased  
9 an AN/PAS 13G Thermal Weapons Sight for \$6,200 from an online seller  
10 and directed the seller to deliver it to the Volo Residence.

11 Overt Act No. 99: On June 10, 2019, defendant GOHMAN purchased  
12 a Trijicon REAP-IR 60MM-IRMS-60-2 mini thermal riflescope for \$8,560  
13 from U.S. Company #2 and directed U.S. Company #2 to deliver it to  
14 the Volo Residence.

15 Overt Act No. 100: On June 14, 2019, defendant POLOSIN e-mailed  
16 defendant GOHMAN instructions to ship two packages: one to defendant  
17 POLOSIN at the Sovhoznaya Address with the contents listed as  
18 "PorterCable 6 Tool Combo Kit - 1 pcs (286 usd)," and one to "Olga  
19 Puzakova" at the Stavropolskaya Address with the contents listed as a  
20 "Celestron 114EQ Telescope - 1 pcs (118 usd) Accessories set - 1 pcs  
21 (164 usd)."

22 Overt Act No. 101: On June 14, 2019, defendant GOHMAN e-mailed  
23 defendant SHIFRIN a document titled "declar 06-04-19," which  
24 contained shipping instructions that were the same -- including  
25 recipient and content information -- as instructions e-mailed by  
26 defendant POLOSIN to defendant GOHMAN earlier on the same day.

27 Overt Act No. 102: On June 15, 2019, an unknown co-conspirator  
28 exported a package to defendant POLOSIN at the Sovhoznaya Address,



1 which listed the sender as "Julia Miller," an alias, the sender's  
2 address as 905 Milwaukee Ave., Apt. 5, Libertyville, IL 60048, and  
3 the contents as "Porter Cable 67001 (Combo Kit)" with a value of  
4 \$286.

5 Overt Act No. 103: On June 22, 2019, an unknown co-conspirator  
6 exported a package to "Olga Puzakova" at the Stavropolskaya Address,  
7 which listed the sender as "Lena Nikitina," an alias, and the  
8 sender's address as the Corey Lane Address.

9 Overt Act No. 104: On June 26, 2019, defendant POLOSIN e-mailed  
10 defendant GOHMAN instructions to purchase an AN/PAS 13-B Eyepiece  
11 from an online seller.

12 Overt Act No. 105: June 27, 2019, defendant GOHMAN bought an  
13 AN/PAS 13-B Eyepiece from an online seller for \$2,000 and directed  
14 the seller to ship the item to defendant GOHMAN at the Mundelein  
15 Residence.

16 Overt Act No. 106: On July 8, 2019, defendant POLOSIN e-mailed  
17 defendant GOHMAN instructions to ship an item to "Olga Puzakova" at  
18 the Stavropolskaya Address with the contents listed as "PorterCable  
19 Grinder, Women cloth, Child cloth, Hair care set."

20 Overt Act No. 107: On July 9, 2019, defendant GOHMAN e-mailed  
21 defendant SHIFRIN shipping instructions that defendant POLOSIN had e-  
22 mailed to defendant GOHMAN on July 8, 2019.

23 Overt Act No. 108: On July 9, 2019, an unknown co-conspirator  
24 exported a package to "Olga Puzakova" at the Stavropolskaya Address,  
25 which listed the sender "Lena Nikitina," an alias, and the sender's  
26 address as the Corey Lane Address.

27 Overt Act No. 109: On July 9, 2019, defendant GOHMAN purchased  
28 a Trijicon REAP-IR 60MM mini thermal riflescope from U.S. Company #2

1 for \$8,560 and directed U.S. Company #2 to ship the item to "Vladimir  
2 Gohman (Pridacha)" at the Volo Residence.

3 Overt Act No. 110: On July 28, 2019, defendant POLOSIN e-mailed  
4 defendant GOHMAN instructions to ship an item to defendant POLOSIN at  
5 the Sovhoznaya Address and to list the contents as a Porter-Cable  
6 Kit.

7 Overt Act No. 111: On July 28, 2019, defendant GOHMAN e-mailed  
8 defendant SHIFRIN the same instructions to ship a package --  
9 including the same recipient and listed contents -- as defendant  
10 POLOSIN had e-mailed to defendant GOHMAN earlier on the same day.

11 Overt Act No. 112: On July 31, 2019, an unknown co-conspirator  
12 exported a package to defendant POLOSIN at the Sovhoznaya Address,  
13 which listed the sender "Igor Molot," an alias, and the sender's  
14 address as 300 Lakeside Dr., Vernon Hills, Illinois.

15 Overt Act No. 113: On August 8, 2019, defendant GOHMAN  
16 purchased a Trijicon REAP-IR 60MM mini thermal riflescope from U.S.  
17 Company #2 for \$8,560 and directed U.S. Company #2 to ship the item  
18 to "Vladimir Gohman (Pridacha)" at the Volo Residence.

19 Overt Act No. 114: On August 18, 2019, defendant POLOSIN e-  
20 mailed defendant GOHMAN instructions to ship a package to "Polosina  
21 Lidia" at the Vysotniy Address, with the contents listed as a  
22 "PorterCable Kit" and "Daiwa Spinning Reel."

23 Overt Act No. 115: On August 19, 2019, defendant GOHMAN e-  
24 mailed defendant SHIFRIN the same instructions to ship a package --  
25 including the same recipient and listed contents -- as defendant  
26 POLOSIN had e-mailed to defendant GOHMAN earlier on the same day.

27 Overt Act No. 116: On August 19, 2019, an unknown co-  
28 conspirator exported a package to "Lidia Poloain" at the Vysotniy

1 Address, which listed the sender as "Alex Volkov," an alias, and the  
2 sender's address as 10 Robert York Ave, Deerfield, Illinois.

3 Overt Act No. 117: On September 5, 2019, defendant GOHMAN  
4 purchased two Trijicon IR Patrol M300W Thermal Weapon Mountable  
5 Monoculars from U.S. Company #2 for \$12,950 and directed U.S. Company  
6 #2 to deliver them to defendant GOHMAN at the Volo Residence.

7 Overt Act No. 118: On September 11, 2019, defendant POLOSIN e-  
8 mailed defendant GOHMAN instructions to ship a package to "Polocina  
9 Julia" at the Novorossiyskaya Address, with the contents listed as  
10 "Child things, Manual tools, Men cloth, Women shoes."

11 Overt Act No. 119: On September 11, 2019, defendant GOHMAN e-  
12 mailed defendant SHIFRIN the same instructions to ship a package --  
13 including the same recipient and listed contents -- as defendant  
14 POLOSIN had e-mailed to defendant GOHMAN earlier on the same day.

15 Overt Act No. 120: On September 12, 2019, an unknown co-  
16 conspirator exported a package to "Julia Polocina" at the  
17 Novorossiyskaya Address, which listed the sender as "Arina Volkova,"  
18 an alias, and the sender's address as 1250 Church St., Apt. 1,  
19 Northbrook, Illinois.

20 Overt Act No. 121: On October 3, 2019, defendant GOHMAN  
21 purchased a PVS-15B night vision device from an online seller and  
22 directed the seller to ship it to defendant SHIFRIN at an address in  
23 Northbrook, Illinois.

24 Overt Act No. 122: On October 9, 2019, defendant SHIFRIN e-  
25 mailed defendant GOHMAN and asked for instructions regarding what she  
26 should list as the contents for a package that she intended to export  
27 that day.

28

1           Overt Act No. 123: On October 9, 2019, defendant GOHMAN  
2 e-mailed defendant SHIFRIN instructions to ship a package to the  
3 Ostapovskiy Address, with the contents listed as "Celestron 114EQ  
4 Telescope, Badminton racket."

5           Overt Act No. 124: On November 22, 2019, defendant GOHMAN  
6 purchased two IR Hunter MK III 60MM thermal riflescopes from U.S.  
7 Company #2 for \$16,650 and directed U.S. Company #2 to ship the items  
8 to the Volo Residence.

9           Overt Act No. 125: On December 2, 2019, defendant GOHMAN  
10 purchased a Trijicon REAP-IR 35MM mini thermal riflescope from U.S.  
11 Company #2 for \$7,399 and directed U.S. Company #2 to ship the item  
12 to the Volo Residence.

13           Overt Act No. 126: On December 14, 2019, defendant POLOSIN e-  
14 mailed defendant GOHMAN instructions to ship a package to "Puzakova  
15 Olga" at the Stavropolskaya Address, with the contents listed as  
16 "Women cloth - 1 set, PorterCable Grinder - 1 pcs, Child Cloth - 1  
17 set, Hair care set - 1 pcs."

18           Overt Act No. 127: On December 14, 2019, an unknown co-  
19 conspirator exported a package to "Olga Puzakova" at the  
20 Stavropolskaya Address, which listed the sender as "Alan Miller," an  
21 alias, the sender's address as 127 S. Lake St., Mundelein, Illinois,  
22 and the contents as "1. Women Cloth (Jacket) \$103; 2. Women Shoes  
23 \$72; 3. Porter Cable Grinder \$116; 4. Hair Care Set \$79; 5. Child  
24 Cloth 1 Set \$39."

25           Overt Act No. 128: On December 28, 2019, defendant POLOSIN e-  
26 mailed defendant GOHMAN instructions to purchase a Trijicon UTC XII  
27 Universal Thermal Clip-On Sight from an online seller.

28

1           Overt Act No. 129: On December 28, 2019, defendant GOHMAN  
2 informed a representative from U.S. Company #2 that he wanted to  
3 purchase a Trijicon UTC XII Universal Thermal Clip-On Sight from U.S.  
4 Company #2.

5           Overt Act No. 130: On January 12, 2020, defendant GOHMAN  
6 provided U.S. Company #2 with a signed Export Declaration Statement  
7 that listed defendant GOHMAN's address as the Volo Residence and  
8 stated, among other things, that defendant GOHMAN understood the  
9 Trijicon UTC XII Universal Thermal Clip-On Sight was not to be  
10 exported, that defendant GOHMAN would comply with United States  
11 export control regulations, that defendant GOHMAN was a United States  
12 Citizen, and that defendant GOHMAN was a legal resident of the United  
13 States.

14           Overt Act No. 131: On January 13, 2020, defendant GOHMAN  
15 purchased a Trijicon UTC XII Universal Thermal Clip-On Sight from  
16 U.S. Company #2 for \$22,082.50 and directed U.S. Company #2 to ship  
17 the item to the Volo Residence.

18           Overt Act No. 132: On January 16, 2020, defendant GOHMAN  
19 purchased a REAP-IR 60MM thermal riflescope from U.S. Company #2 and  
20 directed U.S. Company #2 to ship the item to the Volo Residence.

21           Overt Act No. 133: On January 25, 2020, defendant POLOSIN e-  
22 mailed defendant GOHMAN instructions to ship a package to the  
23 Stavropolskaya Address, with the contents listed as "Celestron 114EQ  
24 Telescope - 1 pcs."

25           Overt Act No. 134: On January 25, 2020, an unknown co-  
26 conspirator exported a package to "Olga Puzakova" at the  
27 Stavropolskaya Address, which listed the sender as "Alex Molot," an  
28

1 alias, the sender's address as 551 Farmhill Cir., Wauconda, Illinois,  
2 and the contents as "1. Celestron 114 EQ Telescope \$128."

3 Overt Act No. 135: On May 13, 2020, defendant GOHMAN purchased  
4 two Trijicon REAP-IR 60MM mini thermal riflescopes, bearing serial  
5 numbers 37538 and 37539, from U.S. Company #2 for \$17,569.98 and  
6 directed U.S. Company #2 to ship the items to defendant GOHMAN at the  
7 Volo Residence.

8 Overt Act No. 136: On May 26, 2020, defendant PRIDACHA received  
9 two Trijicon REAP-IR 60MM mini thermal riflescopes bearing serial  
10 numbers 37538 and 37539 at the Volo Residence and falsely stated that  
11 he was defendant GOHMAN to an undercover law enforcement officer who  
12 was posing as a mail carrier.

13 Overt Act No. 137: On May 27, 2020, defendant SHIFRIN received  
14 two Trijicon REAP-IR 60MM mini thermal riflescopes bearing serial  
15 numbers 37538 and 37539 at the Mundelein Residence.

16 Overt Act No. 138: On June 17, 2020, defendant SHIFRIN  
17 attempted to export a package to "Lidia Polosina" at the Vysotniy  
18 Address containing carrying cases for two Trijicon REAP-IR 60MM mini  
19 thermal riflescopes bearing serial numbers 37538 and 37539, but with  
20 the contents listed as one "Hard Case for Camera #27," one "Hard Case  
21 for Lens #16," and two "Power Supply Module[s]," with a total value  
22 of \$165.

23 Overt Act No. 139: On August 1, 2020, defendant SHIFRIN  
24 attempted to export a package to defendant POLOSIN at the Sovhoznaya  
25 Address containing a Trijicon REAP-IR 60MM mini thermal rifle scope  
26 bearing serial number 37539, which listed the sender as "Alexander  
27 Belov," an alias, the sender's address as "215 N. Milwaukee Ave.,  
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1 Apt. 14, Vernon Hills, IL 60061," and the contents as "Porter Cable 6  
2 Tool Combo Kit."

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COUNT TWO

[18 U.S.C. § 371]

A. OBJECTS OF THE CONSPIRACY

20. Beginning no later than on or about December 13, 2016, and continuing until at least on or about October 28, 2020, in Los Angeles County, within the Central District of California, and elsewhere, defendants VLADIMIR GOHMAN, also known as ("aka") "Mike Maru" ("GOHMAN"), BORIS POLOSIN ("POLOSIN"), IGOR PANCHERNIKOV, aka "Mike Maru" ("PANCHERNIKOV"), ELENA SHIFRIN ("SHIFRIN"), and VLADIMIR PRIDACHA ("PRIDACHA), together with others known and unknown to the Grand Jury, conspired and agreed with each other to commit offenses against the United States, namely: (1) to fraudulently and knowingly export from the United States any merchandise, article, or object contrary to any law or regulation of the United States and to receive, conceal, buy, or in any manner facilitate the transportation, concealment, or sale of such merchandise, article, or object prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States, in violation of Title 18, United States Code, Section 554; and (2) to knowingly fail to file and knowingly submit false and misleading export information through the Automated Export System, in violation of Title 13, United States Code, Section 305(a)(1).

B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE ACCOMPLISHED

21. The objects of the conspiracy were to be accomplished, in substance, as follows:

a. Defendant POLOSIN would direct defendant GOHMAN to purchase export-controlled thermal riflescopes, weapons sights,



1 monoculars, and night-vision goggles from online sellers in the  
2 United States

3           b. Defendant POLOSIN would direct defendant GOHMAN to  
4 have the export-controlled thermal riflescopes, weapons sights,  
5 monoculars, and night-vision goggles exported to Russia with the  
6 contents of the exports listed as non-export-controlled items with a  
7 value of less than \$2,500.

8           c. Defendant GOHMAN would purchase export-controlled  
9 thermal riflescopes, weapons sights, monoculars, and night-vision  
10 goggles from online sellers in the United States and direct the  
11 sellers to mail the items to defendant PANCHERNIKOV, defendant  
12 PRIDACHA, or defendant SHIFRIN.

13           d. Defendant GOHMAN would instruct defendants  
14 PANCHERNIKOV and SHIFRIN to ship the export-controlled thermal  
15 riflescopes, weapons sights, monoculars, and night-vision goggles to  
16 Russia and to falsely describe the contents of the exports as non-  
17 export-controlled items with a value of less than \$2,500. Defendant  
18 GOHMAN would further instruct defendant SHIFRIN to use false sender  
19 names and false sender addresses when exporting such items to Russia.

20           e. Defendant PANCHERNIKOV would mail export-controlled  
21 thermal riflescopes, weapons sights, monoculars, and night-vision  
22 goggles to co-conspirators in Russia without obtaining the required  
23 export licenses or filing EEI and would list the contents of the  
24 exports as non-export-controlled items with a value of less than  
25 \$2,500.

26           f. Defendant PANCHERNIKOV would mail export-controlled  
27 thermal riflescopes, weapons sights, monoculars, and night-vision  
28 goggles to defendant SHIFRIN to export to Russia.

1 g. Defendant PRIDACHA would deliver export-controlled  
2 thermal riflescopes, weapons sights, monoculars, and night-vision  
3 goggles to defendant SHIFRIN to export to Russia.

4 h. Defendant SHIFRIN would mail export-controlled thermal  
5 riflescopes, weapons sights, monoculars, and night-vision goggles to  
6 defendant POLOSIN and other co-conspirators in Russia without  
7 obtaining the required export licenses or filing EEI and would list  
8 the contents of the exports as non-export-controlled items with a  
9 value of less than \$2,500.

10 C. OVERT ACTS

11 22. In furtherance of the conspiracy and to accomplish its  
12 objects, defendants GOHMAN, POLOSIN, PANCHERNIKOV, SHIFRIN, and  
13 PRIDACHA, and others known and unknown to the Grand Jury, committed  
14 various overt acts within the Central District of California, and  
15 elsewhere, including, but not limited to Overt Acts numbered 1  
16 through 139 as set forth in Count One, which are re-alleged and  
17 incorporated by reference as if fully set forth herein.

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1 FORFEITURE ALLEGATION

2 [18 U.S.C. § 981(a)(1)(C); 28 U.S.C. § 2461(c); 22 U.S.C. § 401]

3 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal  
4 Procedure, notice is hereby given that the United States of America  
5 will seek forfeiture as part of any sentence, pursuant to Title 18,  
6 United States Code, Section 981(a)(1)(C), Title 28, United States  
7 Code, Section 2461(c), and Title 22, United States Code, Section 401,  
8 in the event of any defendant's conviction of the offenses set forth  
9 in Counts One and Two of this Indictment.

10 2. Any defendant so convicted shall forfeit to the United  
11 States of America the following:

12 a. All right, title, and interest in any and all  
13 property, real or personal, constituting, or derived from, any  
14 proceeds obtained, directly or indirectly, as a result of any offense  
15 charged in each such Count; and

16 b. To the extent such property is not available for  
17 forfeiture, a sum of money equal to the total value of the property  
18 described in subparagraph a.

19 3. Pursuant to Title 21, United States Code, Section 853(p),  
20 as incorporated by Title 28, United States Code, Section 2461(c), any  
21 defendant so convicted shall forfeit substitute property, up to the  
22 total value of the property described in the preceding paragraph if,  
23 as the result of any act or omission of the defendant, the property  
24 described in the preceding paragraph, or any portion thereof  
25 (a) cannot be located upon the exercise of due diligence; (b) has  
26 been transferred, sold to, or deposited with a third party; (c) has  
27 been placed beyond the jurisdiction of the court; (d) has been  
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1 substantially diminished in value; or (e) has been commingled with  
2 other property that cannot be divided without difficulty.


3 4. Pursuant to Title 22, United States Code, Section 401, any  
4 defendant so convicted shall forfeit to the United States of America  
5 any arms or munitions of war or other articles exported or shipped in  
6 violation of law and any vessel, vehicle, or aircraft containing the  
7 same which has been used in exporting or attempting to export such  
8 arms or munitions of war or other articles. Additionally, any  
9 defendant so convicted shall forfeit any commodity (other than arms  
10 or munitions of war) or technology which was intended to or was  
11 exported in violation of laws, and any vessel, vehicle, or aircraft  
12 containing the same or which has been used in exporting or attempting  
13 to export such articles.

14 A TRUE BILL

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16 /S/

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Foreperson

18 TRACY L. WILKISON  
Acting United States Attorney

19  
20   
CHRISTOPHER D. GRIGG  
21 Assistant United States Attorney  
Chief, National Security Division

22 MARK TAKLA  
23 Assistant United States Attorney  
Acting Chief, Terrorism and Export Crimes  
24 Section

25 DAVID T. RYAN  
26 Assistant United States Attorney  
Terrorism and Export Crimes Section

27 WILSON PARK  
28 Assistant United States Attorney  
Terrorism and Export Crimes Section