

FILED

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

2015 MAY 27 PM 2:49

CLERK, US DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE FLORIDA

UNITED STATES OF AMERICA

v.

VLADIMIR ADUNTS
JUSTIN DOWNING

CASE NO. 3:15-cr-**12-3-39 PDB**
Ct. 1: 18 U.S.C. § 371
Forfeiture: 18 U.S.C. § 981(a)(1)(C)
28 U.S.C. § 2461(c)

INDICTMENT

The Grand Jury charges:

COUNT ONE

A. The Conspiracy

1. Beginning at least in or about December 2011, and continuing through at least in or about March 2012, in Duval County, in the Middle District of Florida and elsewhere,

VLADIMIR ADUNTS,
JUSTIN DOWNING,

the defendants herein, did knowingly and willfully combine, conspire, confederate, and agree with each other and with others, known and unknown to the Grand Jury, to commit offenses against the United States, specifically to, while being engaged in the business of betting and wagering, knowingly use and cause to be used a wire communication facility, for the transmission in interstate or foreign commerce, bets and wagers on sporting events, in violation of Title 18, United States Code, Sections 1084(a) and 2.

B. Manner and Means

2. It was part of the conspiracy that Vladimir Adunts and Justin Downing would establish accounts for bettors on www.woundedhorse.com, and would instruct bettors to place bets and wagers on the www.woundedhorse.com website.

3. It was a further part of the conspiracy that Vladimir Adunts and Justin Downing would collect debts representing losses from bets and wagers that were placed on www.woundedhorse.com.

4. It was a further part of the conspiracy that Vladimir Adunts and Justin Downing would pay earnings representing winnings from bets and wagers that were placed on www.woundedhorse.com.

5. It was a further part of the conspiracy that Justin Downing maintained a Wells Fargo bank account, into which payments representing losses from bets and wagers placed on www.woundedhorse.com were deposited.

6. It was a further part of the conspiracy that conspirators would and did perform acts and make statements to hide and conceal the purposes of the conspiracy and the acts committed in furtherance thereof.

C. Overt Acts

7. In furtherance of the conspiracy and to effectuate its objectives, the following overt acts, among others, were committed within the Middle District of Florida:

a. On or about February 13, 2012, Justin Downing went to a

known bettor's place of employment and attempted to collect payment for losses from bets and wagers that were placed on www.woundedhorse.com.

b. On or about February 17, 2012, Vladimir Adunts provided a named source with a Wells Fargo bank account number for the source to make payments for losses from bets and wagers that were placed on www.woundedhorse.com.

c. On or about February 21, 2012, Justin Downing provided a named source with a Wells Fargo bank account number for the source to make payments for losses from bets and wagers that were placed on www.woundedhorse.com.

All in violation of Title 18, United States Code, Section 371.

FORFEITURES

1. The allegations contained in Count One of this Indictment are incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of a conspiracy to violate section 1084, in violation of Title 18, United States Code, Section 371, the defendants, VLADIMIR ADUNTS and JUSTIN DOWNING, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C), any property, real or personal, which constitutes or is derived from proceeds traceable to said violation.

3. If any of the property described above, 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,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL,

Susanna Vance

Foreperson

A. LEE BENTLEY, III
United States Attorney

By:

Diidri W. Robinson
Diidri W. Robinson
Assistant United States Attorney

By:

Julie Hackenberry
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Assistant United States Attorney
Chief, Jacksonville Division

UNITED STATES DISTRICT COURT
Middle District of Florida
Jacksonville Division

THE UNITED STATES OF AMERICA

vs.

VLADIMIR ADUNTS
JUSTIN DOWNING

INDICTMENT

Violation: 18 U.S.C. § 371

A true bill,

Susanna Vance

Foreperson

Filed in open court this 27 day

of May, 2015.

Angela Sanchez, Deputy Clerk
Clerk

Bail \$ _____