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UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION
U.S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO, FLORIDA

UNITED STATES OF AMERICA

v.

CASE NO. 6:17-cr-205-01-40KRS
18 U.S.C. § 371
8 U.S.C. § 1325(c)

WILLIAM MATTHEW TEX PRICE
APRIL COLEEN MOORE
a/k/a April Price
KHAGAN MUSHFIG OGLU NABILI
ZAFAR BAKHRAMOVICH YADIGAROV
SVETLANA VLADIMIROVNA SHAKHRAMANYAN
MARIA ALEXANDRA ROGACHEVA
VALERIY TSOY

INDICTMENT

The Grand Jury charges:

COUNT ONE

A. Introduction

At times material to this Indictment:

1. The Immigration and Nationality Act (“INA”) governed the immigration laws of the United States.
2. Pursuant to the INA, non-citizens of the United States (“aliens”) were not permitted to permanently reside in the United States unless they were lawful permanent residents (“LPRs”).
3. A United States citizen seeking to assist a relative who was an alien in obtaining LPR status in the United States was required to file United

States Citizenship and Immigration Services (“USCIS”) Form I-130, Petition for Alien Relative.

4. An alien seeking to obtain LPR status in the United States was required to file USCIS Form I-485, Application to Register Permanent Residence or Adjust Status.

5. When a United States citizen filed a Form I-130 petition for an alien spouse, a visa could be immediately available to the alien spouse upon the approval of Form I-130, because the spouse was an immediate relative.

6. Immediate relatives had special immigration priority and did not have to wait in line for a visa number to become available for them to immigrate because there were an unlimited number of visas for spouses of United States citizens.

7. An immediate relative relationship allowed the alien spouses to apply on Form I-485, Application to Register Permanent Residence or Adjust Status, to become an LPR either at the same time or subsequent to their United States citizen spouse filing Form I-130, Petition for Alien Relative. The immediate relative petitioning process referenced above will hereinafter be referred to as the “Change of Status Packet.”

8. Once USCIS approved a Change of Status Packet for LPR status, the agency issued the alien an LPR card (Form I-551 or “green card”). The

LPR card authorized the alien to permanently reside and lawfully work in the United States.

9. Denis Yakovlev was the facilitator of the marriage fraud schemes described herein, where he would provide a “one-stop shop” for arranging fraudulent marriages between aliens and United States citizens.

10. As the facilitator of this scheme, Denis Yakovlev would employ individuals (hereafter “Recruiters”) to find United States citizens to enter into fraudulent marriages with aliens who solicited Yakovlev for his services.

11. Part of Denis Yakovlev’s “services” included coaching the aliens and United States citizen “spouses” on how to complete a Change of Status Packet.

B. The Conspiracy

12. Beginning on an unknown date, but not later than in or about July 2015, and continuing through in or about April 2017, in the Middle District of Florida, and elsewhere, the defendants,

WILLIAM MATTHEW TEX PRICE
APRIL COLEEN MOORE
a/k/a April Price
KHAGAN MUSHFIG OGLU NABILI,

did knowingly and willfully combine, conspire, confederate, and agree with each other, Denis Yakovlev, and other persons, both known and unknown to the Grand Jury, to commit an offense against the United States, that is, to

knowingly enter into a marriage for the purpose of evading any provision of the immigration laws, and to defraud the United States, that is, to enter into a fraudulent marriage for the purpose of interfering with and obstructing USCIS in its administration of the immigration laws of the United States.

C. Manner and Means

The manner and means by which the defendants and their conspirators sought to accomplish the objects of the conspiracy included, among other things, the following:

13. It was part of the conspiracy that Denis Yakovlev would and did arrange fraudulent marriages between aliens of the United States and United States citizens for immigration benefits, including, but not limited to, filing a Change of Status Packet.

14. It was a further part of the conspiracy that Denis Yakovlev would and did accept payment from the aliens for arranging the fraudulent marriages.

15. It was a further part of the conspiracy that Denis Yakovlev would and did pay the Recruiters a fee for each United States citizen they referred for the fraudulent marriages.

16. It was a further part of the conspiracy that either Denis Yakovlev or the Recruiters would and did pay the United States citizens an initial

payment on the day of the fraudulent marriage.

17. It was a further part of the conspiracy that Denis Yakovlev's Recruiters would and did help the United States citizens obtain identification documents needed for the marriage license process and for the Change of Status Packet.

18. It was a further part of the conspiracy that Denis Yakovlev and the Recruiters would and did arrange for the United States citizens and aliens engaging in the fraudulent marriages to meet at a predetermined location shortly before or the day of their fraudulent marriage, so that the United States citizens and aliens could prepare for the marriage "ceremony" and exchange contact information.

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

D. Overt Acts

20. In furtherance of the conspiracy and to effectuate the objects thereof, the following overt acts, among others, were committed within the Middle District of Florida, and elsewhere:

a. In or around August, 2015, APRIL COLEEN MOORE, a/k/a April Price, approached a United States citizen (hereinafter "USC1") and asked her to engage in a fraudulent marriage with KHAGAN MUSHFIG OGLU NABILI to obtain LPR status for KHAGAN MUSHFIG OGLU NABILI.

b. On or about August 11, 2015, WILLIAM MATTHEW TEX PRICE drove USC1 to the Department of Motor Vehicles ("DMV") to obtain an identification card for the purpose of using that identification card during the fraudulent marriage licensing process.

c. On or about August 11, 2015, WILLIAM MATTHEW TEX PRICE drove USC1 to the Brevard County ^{Clerk's} ~~Sheriff's~~ Office in Titusville, ^{CD. 8-30-17} Florida, for the purpose of USC1 entering into a fraudulent marriage with KHAGAN MUSHFIG OGLU NABILI so that KHAGAN MUSHFIG OGLU NABILI could obtain LPR status.

d. On or about August 11, 2015, Denis Yakovlev paid USC1 a cash payment for entering into a fraudulent marriage with KHAGAN MUSHFIG OGLU NABILI to obtain LPR status for KHAGAN MUSHFIG OGLU NABILI.

e. On or about August 11, 2015, Denis Yakovlev paid WILLIAM MATTHEW TEX PRICE a cash payment for recruiting a United

States citizen for a fraudulent marriage.

f. On or about July 26, 2016, USC1 and KHAGAN MUSHFIG OGLU NABILI filed and caused to be filed a Change of Status Packet with USCIS.

All in violation of 18 U.S.C. § 371.

COUNT TWO

A. Introduction

1. The allegations contained in paragraphs 1 through 11 of Count One of this Indictment are hereby realleged and incorporated herein by reference.

B. The Conspiracy

2. Beginning on an unknown date, but not later than in or about September 2015, and continuing until in or about July 2016, in the Middle District of Florida, and elsewhere, the defendants,

WILLIAM MATTHEW TEX PRICE
ZAFAR BAKHRAMOVICH YADIGAROV,

did knowingly and willfully combine, conspire, confederate, and agree with each other, Denis Yakovlev, Meghan Toole, and other persons, both known and unknown to the Grand Jury, to commit an offense against the United States, that is, to knowingly enter into a marriage for the purpose of evading any provision of the immigration laws, and to defraud the United States, that

is, to enter into a fraudulent marriage for the purpose of interfering with and obstructing USCIS in its administration of the immigration laws of the United States.

C. Manner and Means

3. The manner and means by which the defendants and their conspirators sought to accomplish the objects of the conspiracy are described in paragraphs 13 through 19 of Count One of this Indictment, the allegations of which are incorporated by this reference as though fully set forth herein.

D. Overt Acts

4. In furtherance of the conspiracy and to effectuate the objects thereof, the following overt acts, among others, were committed within the Middle District of Florida, and elsewhere:

a. In or around September, 2015, WILLIAM MATTHEW TEX PRICE recruited Meghan Toole, a United States citizen, to engage in a fraudulent marriage with ZAFAR BAKHRAMOVICH YADIGAROV for ZAFAR BAKHRAMOVICH YADIGAROV to obtain LPR status.

b. On or about September 23, 2015, WILLIAM MATTHEW TEX PRICE paid Toole cash as an initial payment for agreeing to enter into a fraudulent marriage with ZAFAR BAKHRAMOVICH YADIGAROV.

c. On or about September 24, 2015, WILLIAM MATTHEW

TEX PRICE drove Toole to the Brevard County Clerk of Courts in Titusville, Florida, for the purpose of Toole entering into a fraudulent marriage with ZAFAR BAKHRAMOVICH YADIGAROV.

d. On or about September 24, 2015, Toole and ZAFAR BAKHRAMOVICH YADIGAROV entered into a fraudulent marriage for the purpose of ZAFAR BAKHRAMOVICH YADIGAROV obtaining LPR status.

e. On or about September 24, 2015, Denis Yakovlev paid WILLIAM MATTHEW TEX PRICE a cash payment for recruiting Toole.

f. On or about April 11, 2016, Denis Yakovlev, Toole, and ZAFAR BAKHRAMOVICH YADIGAROV filed and caused to be filed a Change of Status Packet with USCIS.

All in violation of 18 U.S.C. § 371.

COUNT THREE

On or about August 11, 2015, in Brevard County, Florida, in the Middle District of Florida, the defendant,

KHAGAN MUSHFIG OGLU NABILI,

did knowingly and unlawfully enter into a marriage for the purpose of evading a provision of the immigration laws of the United States.

In violation of 8 U.S.C. § 1325(c).

COUNT FOUR

On or about September 24, 2015, in Brevard County, Florida, in the Middle District of Florida, the defendant,

ZAFAR BAKHRAMOVICH YADIGAROV,

did knowingly and unlawfully enter into a marriage for the purpose of evading a provision of the immigration laws of the United States.

In violation of 8 U.S.C. § 1325(c).

COUNT FIVE

On or about July 6, 2015, in Brevard County, Florida, in the Middle District of Florida, the defendants,

APRIL COLEEN MOORE
a/k/a April Price
VALERIY TSOY,

did knowingly and unlawfully enter into a marriage for the purpose of evading a provision of the immigration laws of the United States.

In violation of 8 U.S.C. § 1325(c).

COUNT SIX

On or about July 1, 2015, in Brevard County, Florida, in the Middle District of Florida, the defendants,

WILLIAM MATTHEW TEX PRICE
SVETLANA VLADIMIROVNA SHAKHRAMANYAN,

did knowingly and unlawfully enter into a marriage for the purpose of evading a provision of the immigration laws of the United States.

In violation of 8 U.S.C. § 1325(c).

COUNT SEVEN

On or about January 14, 2016, in Brevard County, Florida, in the Middle District of Florida, the defendants,

WILLIAM MATTHEW TEX PRICE
MARIA ALEXANDRA ROGACHEVA,

did knowingly and unlawfully enter into a marriage for the purpose of evading a provision of the immigration laws of the United States.

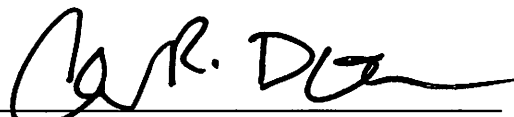
In violation of 8 U.S.C. § 1325(c).


A TRUE BILL,



Foreperson

W. STEPHEN MULDROW
Acting United States Attorney

By: 
Christina R. Downes
Special Assistant United States Attorney

By: 
Katherine M. Ho
Assistant United States Attorney
Chief, Orlando Division

UNITED STATES DISTRICT COURT
Middle District of Florida
Orlando Division

THE UNITED STATES OF AMERICA
vs.
WILLIAM MATTHEW TEX PRICE
APRIL COLEEN MOORE
a/k/a April Price
KHAGAN MUSHFIG OGLU NABILI
ZAFAR BAKHRAMOVICH YADIGAROV
SVETLANA VLADIMIROVNA SHAKHRAMANYAN
MARIA ROGACHEVA
VALERIY TSOY

INDICTMENT

Violations: 18 U.S.C. § 371
8 U.S.C. § 1325(c)

A true bill,

Catherine Wasson

Foreperson

Filed in open court this 30th day

of August 2017.



Clerk

Bail \$ _____
