
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : **TO BE FILED UNDER SEAL**
 :
 v. : Hon. Mark Falk
 :
 IGOR BUZYUKOV : Mag. No. **19-3536**
 :
 : **CRIMINAL COMPLAINT**

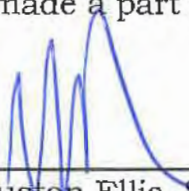
I, Juston Ellis, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the U.S. Secret Service, and that this Complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

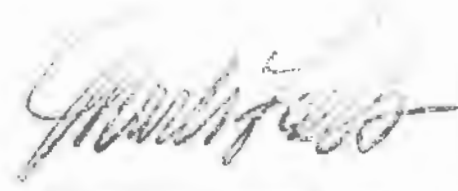


Juston Ellis, Special Agent
United States Secret Service

Sworn to before me, and
subscribed in my presence

February 15th, 2019 at
Newark, New Jersey

HONORABLE MARK FALK
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Money Laundering)

From in or around February 2018 through in or around July 2018, in the District of New Jersey and elsewhere, defendant

IGOR BUZYUKOV

did knowingly and willfully conspire and agree with others, known and unknown, to conduct financial transactions which in fact involved the proceeds of a specified unlawful activity, namely bank fraud, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, and with intent to promote the carrying on of the specified unlawful activity and/or knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of property that was the proceeds of specified unlawful activity, contrary to Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 1956(a)(1)(B)(i).

In violation of Title 18, United States Code, Section 1956(h).

ATTACHMENT B

I, Juston Ellis, being first duly sworn, depose and state the following:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the United States Secret Service (“USSS”), and have been so employed since August of 2017. I am assigned to the Electronic Crimes Task Force. Prior to becoming a Special Agent with the USSS, I worked as a Special Agent Student Trainee with USSS for approximately nine months. During the course of my employment as a Special Agent with the USSS, I have received extensive training with respect to investigating electronic crimes, money laundering, financial crimes, and other criminal violations at the Federal Law Enforcement Training Center in Glynco, Georgia and RTC USSS training facility located in Greenbelt Maryland. The training included evaluating probable cause, executing search warrants, and examining the personal and business records of individuals and corporations for federal financial criminal violations.
2. Since this Affidavit is submitted for the sole purpose of establishing probable cause to support the issuance of a federal criminal complaint and arrest warrant, I have not included each and every fact known by the Government concerning this investigation. Except as otherwise indicated, the actions, conversations, and statements of others identified in this Affidavit – even where they appear in quotations – are reported in substance and in part. Similarly, dates and times are approximations, and should be read as “on or about,” “in or about,” or “at or about” the date or time provided.

BACKGROUND

3. At various times relevant to this Complaint:
 - a. The defendant, IGOR BUZYUKOV, was a resident of Florida.
 - b. Company-1 was a financial technology company headquartered in San Jose, California.
 - c. Company-2 was an online retailer of automotive parts and accessories headquartered in Cranbury, New Jersey.
 - d. Company-3 was a provider of adoption services headquartered in Scottsdale, Arizona.
 - e. Individual-1 was the CEO of Company-2.
 - f. Vigor Green LLC (“Vigor Green”) was Florida corporation. Vigor Green’s registered agent and manager is BUZYUKOV, and its

mailing address is BUZYUKOV's home address. According to business filings, there are no other individuals authorized to do business on behalf of the Vigor Green.

PROBABLE CAUSE

4. Since in or about May 2018, the USSS has been investigating a business account takeover scheme to defraud Company-1. On or about June 8, 2018, the USSS was contacted by general counsel for Company-2, who advised that Company-2 had fallen victim to a business account takeover scheme, which resulted in losses exceeding approximately \$8.5 million.
5. Company-2 holds an account with Company-1, through which it receives payments from online customers. According to information received from Company-2 and Company-1, the amount of business conducted through the Company-2 account at Company-1 averaged between \$150,000 and \$300,000 per day at the time of the account takeover. Due to the monetary amount of transactions being processed, Company-2 was provided with a Company-1 account manager who was responsible for servicing the Company-2 account.
6. On or about April 26, 2018, an unknown individual contacted Company-2's account manager at Company-1 by phone and identified himself as Company-2's CEO, Individual-1. During the phone call, and one follow-up call, the individual or individuals claiming to be Individual-1 requested that Bank of America ("BOA") account ending in 6874, ("the 6874 Account") be added to the Company-2 account at Company-1 and be designated to receive payments. The individual(s) claiming to be Individual-1 provided the account manager with certain personal identifying information belonging to Individual-1 and the unauthorized bank account was added to Company-2's account.
7. Approximately six weeks later, during an account audit, Company-2 learned that approximately \$8.5 million in payments was transferred from Company-2's account at Company-1 to the 6874 Account.
8. Bank records show that the 6874 Account is held in the name of Vigor Green. The signatories to the 6874 Account are BUZYUKOV and his wife. The address associated with the 6874 account is 2181 Salerno Circle, Weston, FL 33327, which is BUZYUKOV'S home address.
9. A review of records associated with the 6874 Account revealed that it also received approximately \$22,000 in transfers from Company-1 related to an account held at Company-1 by Company-3. A representative from Company-3 confirmed that the transfers to the 6874 account were unauthorized.
10. The USSS further determined that more than \$6 million of the fraudulent funds received by the 6874 Account were subsequently transferred out of

the account to other accounts held by BUZYUKOV and his wife, and to various individuals residing in Eastern Europe. Specifically, approximately \$246,963.00 was transferred to Chase Bank account ending in 5383, belonging to BUZYUKOV and his wife; approximately \$171,960.00 was transferred to Chase Bank account ending in 6163, held by Vigor Green and on which BUZYUKOV and his wife were the signatories; and approximately \$6,047,525 was transferred to other Bank of America accounts held by Vigor Green and also on which BUZYUKOV and his wife were the signatories. Approximately \$5,979,840 was then transferred out of the above referenced Vigor Green accounts to at least 57 different individuals with bank accounts located in Eastern Europe, predominantly in Russia.

11. A review of bank records associated with the 6874 Account revealed minimal transactions apart from the unauthorized transfers described above. There is therefore probable cause to believe that the 6874 Account was opened and managed solely for the purpose of facilitating this fraud.
12. A further review of bank records revealed that in or about February 2018, other BOA accounts held by BUZYUKOV and his wife under the Vigor Green business name received unauthorized funds from additional Company-1 clients totaling approximately \$82,000.
13. On June 11, 2018, members of the USSS interviewed BUZYUKOV at his home in Weston, Florida. BUZYUKOV admitted that the 6874 Account belonged to him. BUZYUKOV claimed that the payments were related to artwork he sold to Company-2.
14. USSS agents subsequently interviewed Individual-1 and other employees of Company-2. According to Individual-1, he never called Company-1 to request a bank account change. Individual-1 also denied knowing BUZYUKOV. Further, all interviewed members denied purchasing any artwork for Company-2 or themselves from BUZYUKOV.

CONCLUSION

For the foregoing reasons, there is probable cause to believe that BUZYUKOV engaged in the offense of Money Laundering Conspiracy, in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i) and 1956(h).