

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
UNITED STATES OF AMERICA :
 :
- v. - :
 :
DENIS ALIMOV, :
a/k/a "Denis Nazarovich Alimov," :
a/k/a "Denis N Alimov" :
a/k/a "Denis Nevsky," :
a/k/a "Dionis Nevsky," :
a/k/a "Denis Klimenkov," :
a/k/a "Denis Nazarovich Klimenkov," :
 :
Defendant. :
----- X

SUPERSEDING
INDICTMENT

S2 25 Cr. 122 (JPC)

The Grand Jury charges:

COUNT ONE
(Conspiracy to Commit Murder and Kidnapping in a Foreign Country)

1. From at least in or about October 2024, up to and including in or about March 2025, in the Southern District of New York and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district, DENIS ALIMOV, a/k/a "Denis Nazarovich Alimov," a/k/a "Denis N Alimov," a/k/a "Denis Nevsky," a/k/a "Dionis Nevsky," a/k/a "Denis Klimenkov," a/k/a "Denis Nazarovich Klimenkov," the defendant, who is expected to be first brought to and arrested in the Southern District of New York, and others known and unknown, knowingly and intentionally did combine, conspire, confederate, and agree together and with each other, within the jurisdiction of the United States, to commit, at any place outside the United States, acts that would constitute the offenses of murder and kidnapping if committed in the special maritime and territorial jurisdiction of the United States.

Overt Acts

2. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about October 17, 2024, at a restaurant near the headquarters of a particular foreign country's ("Country-1") internal security and counterintelligence service, DENIS ALIMOV, a/k/a "Denis Nazarovich Alimov," a/k/a "Denis N Alimov," a/k/a "Denis Nevsky," a/k/a "Dionis Nevsky," a/k/a "Denis Klimenkov," a/k/a "Denis Nazarovich Klimenkov," the defendant, paid Darko Durovic, a co-conspirator, approximately \$60,000 to finance a plot to murder or kidnap two well-known dissidents (the "Targets") from a republic in Country-1 (the "Plot"). In connection with the Plot, ALIMOV agreed to pay Durovic approximately \$1.5 million to murder or kidnap each of the Targets.

b. Between approximately in or about December 2024 and January 2025, and while in the United States, Durovic recruited another co-conspirator ("CC-1") to participate in the Plot.

c. Between approximately in or about December 2024 and January 2025, and while in the United States, Durovic sent CC-1 certain IP address and phone number information concerning one of the Targets, which ALIMOV had previously given to Durovic to facilitate the Plot.

(Title 18, United States Code, Sections 956(a)(1) and 3238.)

COUNT TWO
(Conspiracy to Provide Material Support to Terrorists)

The Grand Jury further charges:

3. From at least in or about October 2024, up to and including in or about March 2025, in the Southern District of New York and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district, DENIS ALIMOV, a/k/a “Denis Nazarovich Alimov,” a/k/a “Denis N Alimov,” a/k/a “Denis Nevsky,” a/k/a “Dionis Nevsky,” a/k/a “Denis Klimenkov,” a/k/a “Denis Nazarovich Klimenkov,” the defendant, who is expected to be first brought to and arrested in the Southern District of New York, and others known and unknown, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to provide “material support or resources,” as that term is defined in Title 18, United States Code, Section 2339A(b), namely, property, services, and personnel (including himself), and to conceal and disguise the nature, location, source, and ownership of material support and resources, knowing and intending that they were to be used in preparation for, and in carrying out, a violation of Title 18, United States Code, Section 956(a)(1) (conspiracy to kidnap and murder persons in a foreign country).

4. It was a part and an object of the conspiracy that DENIS ALIMOV, a/k/a “Denis Nazarovich Alimov,” a/k/a “Denis N Alimov,” a/k/a “Denis Nevsky,” a/k/a “Dionis Nevsky,” a/k/a “Denis Klimenkov,” a/k/a “Denis Nazarovich Klimenkov,” the defendant, and others known and unknown, would and did knowingly and intentionally provide, and attempt to provide, “material support or resources,” as that term is defined in Title 18, United States Code, Section 2339A(b), namely, property, services, and personnel (including himself), and to conceal and

disguise the nature, location, source, and ownership of material support and resources, knowing and intending that they were to be used in preparation for, and in carrying out, a violation of Title 18, United States Code, Section 956(a)(1) (conspiracy to kidnap and murder persons in a foreign country).

(Title 18, United States Code, Sections 2339A and 3238.)

COUNT THREE
(Provision and Attempted Provision of Material Support to Terrorists)

The Grand Jury further charges:

5. From at least in or about October 2024, up to and including in or about March 2025, in the Southern District of New York and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district, DENIS ALIMOV, a/k/a “Denis Nazarovich Alimov,” a/k/a “Denis N Alimov,” a/k/a “Denis Nevsky,” a/k/a “Dionis Nevsky,” a/k/a “Denis Klimenkov,” a/k/a “Denis Nazarovich Klimenkov,” the defendant, who is expected to be first brought to and arrested in the Southern District of New York, did knowingly and intentionally provide, and attempt to provide, “material support or resources,” as that term is defined in Title 18, United States Code, Section 2339A(b), namely, property, services, and personnel (including himself), and to conceal and disguise the nature, location, source, and ownership of material support and resources, knowing and intending that they were to be used in preparation for and in carrying out a violation of conspiring to kidnap and murder persons in a foreign country, in violation of Title 18, United States Code, Section 956(a)(1).

(Title 18, United States Code, Sections 2339A, 3238, and 2.)

COUNT FOUR
(Conspiracy to Finance Terrorism)

The Grand Jury further charges:

6. From at least in or about October 2024, up to and including in or about March 2025, in the Southern District of New York and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district, DENIS ALIMOV, a/k/a “Denis Nazarovich Alimov,” a/k/a “Denis N Alimov,” a/k/a “Denis Nevsky,” a/k/a “Dionis Nevsky,” a/k/a “Denis Klimenkov,” a/k/a “Denis Nazarovich Klimenkov,” the defendant, who is expected to be first brought to and arrested in the Southern District of New York, and others known and unknown, knowingly and willfully combined, conspired, confederated, and agreed together and with each other to provide and collect funds, directly and indirectly, with the intention and the knowledge that they were to be used, in full or in part, to carry out a terrorist act, to wit, an act intended to cause death and serious bodily injury to a civilian, the purpose of which, by its nature and context, was to intimidate a population and to compel a government or international organization to do and abstain from doing any act.

(Title 18, United States Code, Sections 2339C(a), 2339C(b)(2)(B), and 3238.)

COUNT FIVE
(Financing of Terrorism)

The Grand Jury further charges:

7. From at least in or about October 2024, up to and including in or about March 2025, in the Southern District of New York and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district, DENIS ALIMOV, a/k/a “Denis Nazarovich Alimov,” a/k/a “Denis N Alimov,” a/k/a “Denis Nevsky,” a/k/a “Dionis Nevsky,” a/k/a “Denis

Klimenkov,” a/k/a “Denis Nazarovich Klimenkov,” the defendant, who is expected to be first brought to and arrested in the Southern District of New York, did unlawfully and willfully provide and collect funds, by any means, directly and indirectly, and attempt to do so, with the intention that such funds be used, and with the knowledge that such funds were to be used, in full or in part, in order to carry out any act intended to cause death and serious bodily injury to a civilian, and to any other person not taking an active part in hostilities in a situation of armed conflict, when the purpose of such act, by its nature and context, was to intimidate a population, and to compel a government or an international organization to do and to abstain from doing any act.

(Title 18, United States Code, Sections 2339C(a), 2339C(b)(2)(B), 3238, and 2.)

FORFEITURE ALLEGATIONS

8. As a result of committing the offenses alleged in Counts One, Two, Three, Four, and Five of this Superseding Indictment, DENIS ALIMOV, a/k/a “Denis Nazarovich Alimov,” a/k/a “Denis N Alimov,” a/k/a “Denis Nevsky,” a/k/a “Dionis Nevsky,” a/k/a “Denis Klimenkov,” a/k/a “Denis Nazarovich Klimenkov,” the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 981(a)(1)(C), (G), & (H), and Title 28, United States Code, Section 2461(c), any and all assets, foreign and domestic, of the defendant; any and all assets, foreign and domestic, affording the defendant a source of influence over any entity or organization engaged in planning or perpetrating said offenses; any and all assets, foreign and domestic, acquired or maintained with the intent and for the purpose of supporting, planning, conducting or concealing said offenses; any and all assets, foreign and domestic, derived from, involved in, or used or intended to be used to commit said offenses; and any and all property, real or personal, which constitutes or is derived from proceeds traceable to said offenses, including but not limited

to a sum of money in United States currency representing said assets and property.

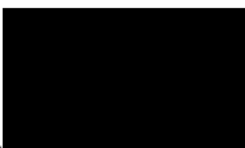
Substitute Assets Provision

9. If any of the above-described forfeitable property, as a result of any act or omission of DENIS ALIMOV, a/k/a "Denis Nazarovich Alimov," a/k/a "Denis N Alimov," a/k/a "Denis Nevsky," a/k/a "Dionis Nevsky," a/k/a "Denis Klimenkov," a/k/a "Denis Nazarovich Klimenkov," 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;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



FOREPERSON



JAY CLAYTON
United States Attorney