

UNITED STATES DISTRICT COURT JUDGE OETKEN  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

- v. - :

JEVGENI BOKOV, :  
VIKTOR LITVINTSUK, :  
AMID MAGERRAMOV, :  
NIKOLAI NIFTALIJEV, and :  
VITALI VORONJUK, :

INDICTMENT

18 Cr.

18 CRIM 678

Defendants. :

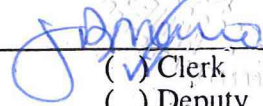
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COUNT ONE  
(Narcotics Importation Conspiracy)

The Grand Jury charges:

1. From at least in or about October 2017, up to and including in or about September 2018, 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, JEVGENI BOKOV, VIKTOR LITVINTSUK, AMID MAGERRAMOV, NIKOLAI NIFTALIJEV, and VITALI VORONJUK, the defendants, who are expected to be first brought to and arrested in the Southern District of New York, and whose point of entry into the United States is expected to be the Southern District of New York, and others known and unknown, intentionally and knowingly combined, conspired, confederated, and agreed to violate the narcotics laws of the United States.

CERTIFIED AS A TRUE COPY ON  
THIS DATE SEP 24 2018

BY   
( ☒ ) Clerk  
( ) Deputy

2. It was a part and an object of the conspiracy that JEVGENI BOKOV, VIKTOR LITVINTSUK, AMID MAGERRAMOV, NIKOLAI NIFTALIJEV, and VITALI VORONJUK, the defendants, and others known and unknown, would and did knowingly and intentionally import into the United States and into the customs territory of the United States from a place outside thereof controlled substances, in violation of Title 21, United States Code, Sections 952(a) and 960(a)(1).

3. It was further a part and an object of the conspiracy that JEVGENI BOKOV, VIKTOR LITVINTSUK, AMID MAGERRAMOV, NIKOLAI NIFTALIJEV, and VITALI VORONJUK, the defendants, and others known and unknown, would and did manufacture, possess with intent to distribute, and distribute controlled substances, intending, knowing, and having reasonable cause to believe that such substances would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States, in violation of Title 21, United States Code, Sections 959(a) and 960(a)(3).

4. The controlled substances involved in the offense were (a) 100 grams and more of mixtures and substances containing a detectable amount of carfentanil, an analogue of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"); and (b) 400 grams and more of mixtures and

substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 960(b)(1)(F).

(Title 21, United States Code, Sections 952(a), 959(a), 959(d), 960(a), 960(b)(1)(F), and 963; Title 18, United States Code, Section 3238.)

**COUNT TWO**  
**(Narcotics Distribution for Importation)**

The Grand Jury further charges:

5. On or about May 9, 2018, 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, VIKTOR LITVINTSUK, AMID MAGERRAMOV, NIKOLAI NIFTALIJEV, and VITALI VORONJUK, the defendants, who are expected to be first brought to and arrested in the Southern District of New York, and whose point of entry into the United States is expected to be the Southern District of New York, intentionally and knowingly manufactured, possessed with intent to distribute, and distributed, and attempted to do the same, a controlled substance, intending, knowing, and having reasonable cause to believe that such substance would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States, in violation Title 21, United States Code, Sections 959(a), 960(a)(3), and 963.

6. The controlled substance involved in the offense was 100 grams and more of mixtures and substances containing a

detectable amount of carfentanil, an analogue of fentanyl, in violation of Title 21, United States Code, Section 960(b)(1)(F).

(Title 21, United States Code, Sections 959(a), 959(d), 960(a)(3), 960(b)(1)(F), and 963; Title 18, United States Code, Sections 2 and 3238.)

**COUNT THREE**  
**(Narcotics Distribution for Importation)**

The Grand Jury further charges:

7. On or about May 30, 2018, 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, VIKTOR LITVINTSUK, AMID MAGERRAMOV, NIKOLAI NIFTALIJEV, and VITALI VORONJUK, the defendants, who are expected to be first brought to and arrested in the Southern District of New York, and whose point of entry into the United States is expected to be the Southern District of New York, intentionally and knowingly manufactured, possessed with intent to distribute, and distributed, and attempted to do the same, a controlled substance, intending, knowing, and having reasonable cause to believe that such substance would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States, in violation Title 21, United States Code, Sections 959(a), 960(a)(3), and 963.



8. The controlled substance involved in the offense was 100 grams and more of mixtures and substances containing a detectable amount of carfentanil, an analogue of fentanyl, in violation of Title 21, United States Code, Section 960(b)(1)(F).

(Title 21, United States Code, Sections 959(a), 959(d), 960(a)(3), 960(b)(1)(F), and 963; Title 18, United States Code, Sections 2 and 3238.)

**COUNT FOUR**  
**(Money Laundering)**

9. From at least in or about December 2017, up to and including at least in or about January 2018, 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, JEVGENI BOKOV, the defendant, who is expected to be first brought to and arrested in the Southern District of New York, (a) transported, transmitted, and transferred, and attempted to transport, transmit, and transfer, a monetary instrument and funds to a place in the United States from and through a place outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, the unlawful importation into the United States of controlled substances, in violation of Title 21, United States Code, Sections 952(a) and 959(a); and (b) with the intent to (i) promote the carrying on of specified unlawful activity -- to wit, the unlawful importation into the United States of

controlled substances, in violation of Title 21, United States Code, Sections 952(a) and 959(a) -- and (ii) conceal and disguise the nature, location, source, ownership, and control of property believed to be the proceeds of that specified unlawful activity, conducted and attempted to conduct financial transactions involving property represented to be the proceeds of that specified unlawful activity, and property used to conduct and facilitate that specified unlawful activity, to wit, BOKOV transferred approximately \$56,144, which was represented to BOKOV to be the proceeds of narcotics trafficking, from Europe to a bank account in New York, New York.

(Title 18, United States Code, Sections 2, 1956(a)(2), 1956(a)(3), and 3238.)

**COUNT FIVE**  
**(Money Laundering)**

10. From at least in or about March 2018, up to and including at least in or about April 2018, 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, JEVGENI BOKOV, the defendant, who is expected to be first brought to and arrested in the Southern District of New York, (a) transported, transmitted, and transferred, and attempted to transport, transmit, and transfer, a monetary instrument and funds to a place in the United States from and through a place outside the United States, and attempted to do

the same, with the intent to promote the carrying on of specified unlawful activity, to wit, the unlawful importation into the United States of controlled substances, in violation of Title 21, United States Code, Sections 952(a) and 959(a); and (b) with the intent to (i) promote the carrying on of specified unlawful activity -- to wit, the unlawful importation into the United States of controlled substances, in violation of Title 21, United States Code, Sections 952(a) and 959(a) -- and (ii) conceal and disguise the nature, location, source, ownership, and control of property believed to be the proceeds of that specified unlawful activity, conducted and attempted to conduct financial transactions involving property represented to be the proceeds of that specified unlawful activity, and property used to conduct and facilitate that specified unlawful activity, to wit, BOKOV transferred approximately \$229,124, which was represented to BOKOV to be the proceeds of narcotics trafficking, from Europe to a bank account in New York, New York.

(Title 18, United States Code, Sections 2, 1956(a)(2), 1956(a)(3), and 3238.)

#### FORFEITURE ALLEGATIONS

11. As a result of committing the offenses alleged in Counts One, Two, and Three of this Indictment, VIKTOR LITVINTSUK, AMID MAGERRAMOV, NIKOLAI NIFTALIJEV, and VITALI

VORONJUK, the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds obtained directly or indirectly as a result of said offenses and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses that the defendants personally obtained.

12. As a result of committing the offense alleged in Count One of this Indictment, JEVGENI BOKOV, the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds obtained directly or indirectly as a result of said offense and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense that the defendant personally obtained.

13. As a result of committing the offenses alleged in Counts Four and Five of this Indictment, JEVGENI BOKOV, the defendant, shall forfeit to the United States, pursuant to Title



18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in said offenses, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offenses.

Substitute Assets Provision

14. If any of the property described above as being subject to forfeiture, 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 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 intention of the United States, pursuant to Title 21, United States Code, Sections 853(p) and 970, and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982;  
Title 21, United States Code, Sections 853 and 970; and  
Title 28, United States Code, Section 2461.)



FOREPERSON

  
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GEOFFREY S. BERMAN  
United States Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

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Defendants.

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INDICTMENT

18 Cr.

(21 U.S.C. §§ 952, 959, 960, and 963; 18  
U.S.C. §§ 2, 1956, and 3238)

GEOFFREY S. BERMAN

United States Attorney.

A TRUE BILL

Foreperson.

9/24/18  
KL

Filed Indictment  
wheel B  
Arrest Warrant Issued

case assigned to  
DJ Detken

Stewart Parker  
U.S.M.J.