

APPROVED:

   
SHAWN G. CROWLEY / GEORGE D. TURNER  
Assistant United States Attorneys

BEFORE: THE HONORABLE KATHARINE H. PARKER  
United States Magistrate Judge  
Southern District of New York

18 MAG 6755

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UNITED STATES OF AMERICA

: SEALED COMPLAINT

- v. -

: Violations of  
21 U.S.C. §§ 952, 959,  
960 & 963; 18 U.S.C.  
§§ 2, 1956 & 3238

JEVGENI BOKOV,  
AMID MAGERRAMOV,  
NIKOLAI NIFTALIJEV, and  
VITALI VORONJUK,

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:

Defendants.

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SOUTHERN DISTRICT OF NEW YORK, ss.:

THOMAS W. FRICK, being duly sworn, deposes and says that he is a Special Agent of the Drug Enforcement Administration ("DEA"), and charges as follows:

**COUNT ONE**  
**(Narcotics Importation Conspiracy)**

1. From at least in or about October 2017, up to and including in or about July 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, 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 others known and unknown, intentionally and knowingly combined, conspired, confederated, and agreed to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that JEVGENI BOKOV, AMID MAGERRAMOV, NIKOLAI NIFTALIJEV, and VITALI VORONJUK, the defendants, and others known and unknown, would and did 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, 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 from a place outside thereof, in violation of Title 21, United States Code, Sections 959(a) and 960(a)(3).

4. The controlled substances that JEVGENI BOKOV, AMID MAGERRAMOV, NIKOLAI NIFTALIJEV, and VITALI VORONJUK, the defendants, conspired to (a) import into the United States and into the customs territory of the United States from a place outside thereof, and (b) manufacture, possess with intent to distribute, and distribute, 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 from a place outside thereof, 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)**

5. On or about at least 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, 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, 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, from a place outside thereof, 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(b)(1)(F), and 963; Title 18, United States Code, Sections 2 and 3238.)

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

7. On or about at least 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, 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, 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(b)(1)(F), and 963); Title 18, United States Code, Sections 2 and 3238.)

