

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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THE PEOPLE OF THE STATE OF NEW YORK,

-against-

INDICTMENT NO.
-2022

1. RONI RUBINOV
2. YURIY KHODZHANDIYEV
3. RAFIK ISRAILOV
4. AKASYA YASAROGLU
5. LYUDMILA YUSHUVAYEV A/K/A
"LYUDMILA YADEGAR" A/K/A "LUDI"
6. ERICA ZAMBRANO
7. FATHI NEGADI
8. CAROLINE GALLEGO
9. RAMDASS RAMKISSOON A/K/A "PAULIE"
10. ZAMIRA SHAGANOVA
11. ANA BALACEANU
12. CHARLES HARMAN
13. PATRICE COLLINS
14. SALIMOU DABO
15. JERARD IAMUNNO A/K/A "ITALIANO"
16. LANCE FAIR
17. CAYLA ROMAN
18. KATHLEEN RAGUSA
19. GREGORY ROOSA
20. JORDAN CAVALIERO
21. THOMAS NICHOLAS A/K/A "TOMMY"
22. EVEYLON FERGUSON
23. KEVIN RUTHENBECK
24. DAVID HIGGINS
25. JUSTIN PEPCHINSKI
26. DANIEL WEBER
27. PATRICK CASEY
28. SHAWN HERALD
29. SHANNON WINKLER A/K/A "SHEA"
30. JAMES BILIS A/K/A "SLIM"
31. SAMANTHA COTRONEO
32. HERMAN ELLIS
33. CHRIS PLAMONDON
34. JOSHUA DVORIN
35. REAGAN CALLIHAN A/K/A "MEAGAN"

36. SHARIF WARNER
37. CHASE BUNT
38. MICHAEL MORRIS
39. JABARI SMITH
40. ALONZO ROBERTS
41. JACQUELINE ALESSI

Defendants.

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COUNT 1

ENTERPRISE CORRUPTION

The Grand Jury of New York County, by this Indictment, accuses the defendants, RONI RUBINOV, YURIY KHODZHANDIYEV, RAFIK ISRAILOV, AKASYA YASAROGLU, LYUDMILA YUSHUVAYEV A/K/A “LYUDMILA YADEGAR” A/K/A “LUDI”, ERICA ZAMBRANO, FATHI NEGADI, CAROLINE GALLEGRO, RAMDASS RAMKISSOON A/K/A “PAULIE”, ZAMIRA SHAGANOVA, ANA BALACEANU, and CHARLES HARMAN, of the crime of Enterprise Corruption, in violation of Penal Law § 460.20(1)(a), committed in New York and Queens Counties in the State of New York, and elsewhere as follows:

The defendants, from on or about and between January 1, 2017, and January 8, 2020, having knowledge of the existence of a Criminal Enterprise, to wit: THE RUBINOV ORGANIZED RETAIL THEFT AND FENCING ENTERPRISE, and the nature of its activities, and being members of or associated with that criminal enterprise by participating in a pattern of criminal activity, as follows:

THE CRIMINAL ENTERPRISE

At all times relevant to the First Count:

The defendants RONI RUBINOV, YURIY KHODZHANDIYEV, RAFIK ISRAILOV, AKASYA YASAROGLU, LYUDMILA YUSHUVAYEV A/K/A “LYUDMILA YADEGAR” A/K/A “LUDI”, ERICA ZAMBRANO, FATHI NEGADI, CAROLINE GALLEGO, RAMDASS RAMKISSOON A/K/A “PAULIE”, ZAMIRA SHAGANOVA, ANA BALACEANU, and CHARLES HARMAN, along with other persons known and unknown, were members and/or associates of an enterprise referred to herein as THE RUBINOV ORGANIZED RETAIL THEFT AND FENCING ENTERPRISE, which consisted of a group of persons sharing a common purpose of engaging in criminal conduct. THE RUBINOV ORGANIZED RETAIL THEFT AND FENCING ENTERPRISE had an ascertainable structure that was distinct from a pattern of criminal activity, and had a continuity of existence, structure, and criminal purpose beyond the scope of individual criminal incidents.

The defendants listed under Count One were members and associates of THE RUBINOV ORGANIZED RETAIL THEFT AND FENCING ENTERPRISE — an organized criminal operation with three principal places of business in New York County, Queens County and elsewhere inside and outside the State of New York. THE RUBINOV ORGANIZED RETAIL THEFT AND FENCING ENTERPRISE constituted a “criminal enterprise” as the term is defined in Penal Law § 460.10(3).

The defendant RONI RUBINOV directed the enterprise, and the defendants YURIY KHODZHANDIYEV, RAFIK ISRAILOV, AKASYA YASAROGLU, LYUDMILA YUSHUVAYEV A/K/A “LYUDMILA YADEGAR” A/K/A “LUDI”, ERICA ZAMBRANO, FATHI NEGADI, CAROLINE GALLEGO, RAMDASS RAMKISSOON

A/K/A “PAULIE”, ZAMIRA SHAGANOVA, ANA BALACEANU, and CHARLES HARMAN, were “partners”, “employees,” or “associates” of THE RUBINOV ORGANIZED RETAIL THEFT AND FENCING ENTERPRISE (hereinafter, “the Criminal Enterprise”).

THE STRUCTURE AND PURPOSES OF THE CRIMINAL ENTERPRISE

The epicenter of the Criminal Enterprise was RONI RUBINOV (hereinafter, “RUBINOV”), who directed this organized retail theft and fencing operation to systematically procure stolen property from numerous retail victims — thereby possessing approximately **\$3,806,192** worth of stolen property to resell on RUBINOV’s eBay marketplace site, Treasure-Deals-USA (hereinafter, “RUBINOV’s Treasure-Deals-USA eBay Store”), and subsequently generating approximately **\$1,373,728** in illicit proceeds for himself and other participants within the Criminal Enterprise. At RUBINOV’s direction, the Criminal Enterprise purchased stolen property from thirty distinct larcenists (hereinafter “boosters”) on a daily basis, during and outside regular business hours. RUBINOV trained his employees to procure, and the boosters to steal, specific items from retailers based on sales trends on RUBINOV’s Treasure-Deals-USA eBay Store. Further, RUBINOV instructed his employees to purchase – from boosters - stolen clothing items for six-to-eight percent of their retail value and stolen pharmaceutical items and cosmetics at the rate of one-to-two dollars per item, depending on the brand. RUBINOV regularly provided his employees with cash to pay for the stolen property, which was allocated to promote the ongoing procurement of stolen property.

Once the stolen property was purchased by RUBINOV or his employees, it was stored inside of 71 W 47th Street, Suite 402A and Suite 402B, New York, New York (hereinafter “71 W 47th Street”) or inside of RUBINOV’s New Liberty Loans Pawn Shop located at 67 W 47th Street, New York, New York (hereinafter “the Pawn Shop” or “67 W 47th Street”). Once or twice a week, RUBINOV directed his employees to transport the stolen property in RUBINOV’s black Chevrolet Suburban (hereinafter, “RUBINOV’s Suburban”) from RUBINOV’s offices at 67 W 47th Street and 71 W 47th Street to 166-21 67th Avenue, Fresh Meadows, New York (Queens County) (hereinafter “RUBINOV’s Residence”) and 165-12 69th Avenue, Fresh Meadows, New York (hereinafter “the Stash House”) (collectively, “the Queens Stash Locations”) – both of which were stash locations for the stolen property.

Once the stolen property was delivered to the Queens Stash Locations, the stolen property was inventoried and organized by product type. Cosmetics, pharmaceutical items, hair products, certain clothing items, electronics, strollers, and other miscellaneous property were inventoried and organized in the basement of RUBINOV’s Residence. Other clothing items, purses, shoes, accessories, and additional cosmetics and pharmaceutical items were inventoried and organized in the Stash House. Thereafter, RUBINOV’s employees posted the stolen property for resale on RUBINOV’s Treasure-Deals-USA eBay Store. Once the posted items were purchased, they were transported back to 71 W 47th Street to be packaged and subsequently shipped to RUBINOV’s eBay customers.

Through the resale of stolen property on RUBINOV's Treasure-Deals-USA eBay Store, RUBINOV and other members of the Criminal Enterprise, concealed approximately \$1,373,728 in RUBINOV's eBay-linked-PayPal account and Bank of America account. The concealment of these funds was executed in the following manner: (1) between August 8, 2017 and January 7, 2020, the sales of stolen goods on RUBINOV's Treasure-Deals-USA eBay Store generated approximately \$1,373,728 in gross proceeds; (2) the same sales of stolen goods on RUBINOV's Treasure-Deals-USA eBay Store generated approximately \$1,098,025 – in net proceeds, which were deposited into RUBINOV's Romanov Buyers Inc. PayPal account; (3) after the \$1,098,025 was deposited into RUBINOV's Romanov Buyers Inc. PayPal account, approximately \$154,001 was redirected back to eBay and PayPal to pay eBay and PayPal reinvestment fees while approximately \$956,242 was deposited into RUBINOV's Romanov Gold Buyers Inc., Bank of America account. By washing the illicit proceeds through the Romanov Buyers Inc. PayPal account and subsequently through the Romanov Gold Buyers Inc. Bank of America account, RUBINOV, and other members of the Criminal Enterprise successfully concealed the proceeds from the sale of stolen property in the amount of \$1,373,728.

Additionally, RUBINOV and other members of the Criminal Enterprise utilized the proceeds from the resale of stolen property to reinvest into the Criminal Enterprise. Approximately \$802,401 of the \$956,242 that was deposited into the RUBINOV's Romanov Gold Buyers Inc. Bank of America account was used to reinvest into the Criminal Enterprise. RUBINOV and other members of the Criminal

Enterprise reinvested funds for various illicit business expenses, such as cash withdrawals which paid boosters for stolen property, payments made to RUBINOV's employees, marketing campaigns, car payments and the operation's phone and internet bills. These types of payments and expenses were the foundation of RUBINOV's Criminal Enterprise, which enabled RUBINOV's continued purchase and resale of stolen property; and which perpetuated the flow of illicit proceeds into RUBINOV's PayPal and Bank of America accounts.

In addition to stolen clothing, watches, pharmaceuticals, and cosmetics, RUBINOV directed his employees to purchase stolen gift cards from the boosters. Once in possession of a stolen gift card, RUBINOV and other members of the Criminal Enterprise swiped the balance on the stolen gift card through a merchant account terminal inside of 67 W 47th Street. Between January 1, 2017 and January 8, 2020, RUBINOV and other members of the Criminal Enterprise concealed approximately \$90,381 of illicit proceeds in RUBINOV's New Liberty Pawn Shop Inc. merchant account and New Liberty Pawn Shop Inc., TD Bank accounts. The illicit proceeds from the stolen gift cards were concealed by the Criminal Enterprise in the following manner: (1) boosters stole or fraudulently obtained gift cards; (2) boosters sold the gift cards to RUBINOV and other members of the Criminal Enterprise for approximately 50% of their value; (3) RUBINOV, or one of his employees swiped the gift cards through the merchant account terminal in 67 W 47th Street, (4) RUBINOV or his employees at RUBINOV's direction, created fraudulent receipts for these transactions; (5) the booster was paid in cash by RUBINOV or by one of his employees

for 50% of the value of the gift card; and (6) once the stolen or fraudulently obtained gift cards were processed by RUBINOV's merchant account, the full value of the stolen or fraudulently obtained gift cards were deposited into RUBINOV's New Liberty Pawn Shop Inc., TD Bank accounts – thereby concealing the illegal proceeds of the gift card transactions.

RUBINOV directed members of the Criminal Enterprise, dictated the quantity, type and frequency in which stolen property was acquired in addition to the price that RUBINOV and his employees paid for the stolen property. RUBINOV controlled the flow of money within the Criminal Enterprise – instructing certain trusted members of the Criminal Enterprise to withdraw money from his bank accounts or from his safes – and used that money to pay for additional stolen property. RUBINOV also provided access to the Queens Stash Locations to other members and associates of the Criminal Enterprise. In addition to obtaining and possessing stolen property from other members of the Criminal Enterprise, RUBINOV also managed the inventory, organization, and resale of the stolen property.

Positioned directly beneath RUBINOV was YURIY KHODZHANDIYEV (hereinafter, "YURIY"). RUBINOV provided YURIY with full access to the Criminal Enterprise's financial accounts as well as the vault and safes that stored cash at RUBINOV's business locations. YURIY was responsible for overseeing the day-to-day booster transactions in 67 W 47th Street and 71 W 47th Street. This included the intake of stolen property, acting as an intermediary between RUBINOV and the

boosters with regard to price negotiation for the stolen property and paying the boosters in cash for the stolen property.

Laterally positioned to YURIY was RAFIK ISRAILOV (hereinafter, "RAFIK"). RAFIK often purchased stolen property from the boosters inside of the 67 W 47th Street and 71 W 47th Street locations. At times, RAFIK directed the Criminal Enterprise's lower-level employees as to how much money to pay the boosters for the stolen property and provided the lower-level employees with cash to complete these transactions. Additionally, RUBINOV regularly sent boosters to meet RAFIK in Queens after the 67 W 47th Street and 71 W 47th Street locations were closed. Typically, RAFIK met boosters in and around the Forest Hills/ 71st Avenue New York City subway stop in Queens County to purchase stolen property from the boosters in exchange for cash.

RUBINOV's lower-level employees, including, AKASYA YASAROGLU (hereinafter, "AKASYA"), LYUDMILA YUSHUVAYEV A/K/A "LYUDMILA YADEGAR" A/K/A "LUDI" (hereinafter, "LUDI"), RAMDASS RAMKISSOON A/K/A "PAULIE" (hereinafter, "PAULIE"), ZAMIRA SHAGANOVA (hereinafter, "ZAMIRA"), ERICA ZAMBRANO (hereinafter, "ZAMBRANO"), FATHI NEGADI (hereinafter, "FATHI") reported to YURIY and RUBINOV. As a lower-level employee, AKASYA worked out of 71 W 47th Street and engaged with the boosters at the direction of both RUBINOV and YURIY. Daily, AKASYA purchased stolen property from the boosters with cash provided by RUBINOV, YURIY, LUDI, ZAMIRA and RAFIK and subsequently bagged the stolen property for transport to the Queens

Stash Locations. Additionally, AKASYA posted the stolen property to RUBINOV's Treasure-Deals-USA eBay Store and packaged the stolen property for shipment to RUBINOV's eBay customers.

Inside of 67 W 47th Street, LUDI, ZAMIRA and ZAMBRANO worked as the Pawn Shop office managers. RUBINOV and YURIY directed LUDI, ZAMIRA and ZAMBRANO to perform a number of tasks, including, but not limited to,: (1) handle the intake of new boosters; (2) alert RUBINOV and YURIY to the fact that boosters were waiting to meet them; (3) send RUBINOV, YURIY and RAFIK photos of stolen property; (4) purchase stolen property and gift cards from the boosters that went directly to 67 W 47th Street; (5) swipe the gift cards through the Pawn Shop merchant account terminal; and (6) create fraudulent receipts for the purchase of the stolen gift cards.

FATHI and CAROLINE GALLEGO (hereinafter, "CAROLINE") worked out of the Stash House. RUBINOV directed FATHI to build a storage space with shelves for stolen pharmaceutical items and cosmetics in the basement of the Stash House. However, FATHI's primary function was transporter of the stolen property – both from Manhattan to Queens and from Queens back to Manhattan while using RUBINOV's Vehicle. Following a delivery of stolen property to Queens, RUBINOV directed FATHI to distribute and organize the stolen property between the Queens Stash Locations. Thereafter, FATHI and CAROLINE's jobs were to organize the stolen property inside of the Stash House. Additionally, CAROLINE posted the

stolen goods that were stored at the Stash House to RUBINOV's Treasure-Deals-USA eBay Store.

It was also FATHI's job to transport stolen property from Queens to Manhattan using RUBINOV's Vehicle. Multiple times a week, FATHI assembled bags of stolen property that had been purchased from RUBINOV's Treasure-Deals-USA eBay Store and transported said property from Queens to Manhattan to be shipped to RUBINOV's Treasure-Deals-USA eBay customers. Once delivered to Manhattan, AKASYA and YURIY packed and shipped the stolen merchandise to RUBINOV's eBay customers.

In addition to organizing the stolen property in the Stash House and posting stolen property to RUBINOV's Treasure-Deals-USA eBay Store, CAROLINE oversaw business strategy and development – with a focus on expanding RUBINOV's marketing, sales, and profit margins. As part of this role, CAROLINE regularly visited 67 W 47th Street and 71 W 47th Street to observe and instruct RUBINOV's lower-level employees and the boosters on how to: (1) remove anti-theft devices and security tags from items prior to selling to RUBINOV; (2) steal high quality items that have demonstrated resale success; and (3) avoid stealing expired cosmetic and pharmaceutical items that are problematic during the resale process.

FATHI and CAROLINE had an inventory and eBay manager counterpart – ANA BALACEANU (hereinafter “ANA”), who worked out of RUBINOV's Residence. ANA inventoried and organized the stolen property in the basement of RUBINOV's Residence. Thereafter, ANA posted these stolen property items to RUBINOV's

Treasure-Deals-USA eBay Store for resale and was tasked with maintenance and oversight of eBay purchases and customer support. As a long-time employee of the Criminal Enterprise, ANA was directed by RUBINOV to oversee FATHI, CAROLINE and AKASYA with regard to (1) the inventory and location of the stashed stolen property; (2) the posting of stolen property on RUBINOV's Treasure-Deals-USA eBay Store; (3) the shipment of purchased items from RUBINOV's Treasure-Deals-USA eBay Store; and (4) troubleshooting issues with damaged, missing, or expired property.

In addition to RUBINOV's on-site employees, RUBINOV contracted a remote web designer and eCommerce consultant, CHARLES HARMAN (hereinafter "HARMAN"). At RUBINOV's direction, HARMAN (1) maintained RUBINOV's Treasure Deals USA eBay Store; (2) updated and created websites for the Criminal Enterprise; (3) increased RUBINOV's online visibility through Google metrics; (4) tried to expand RUBINOV's sales platform to Amazon and Shopify; and (5) trained ANA, CAROLINE, LUDI, AKASYA and other employees on how to increase their productivity and grow RUBINOV's profit margin on RUBINOV's eBay and other eCommerce sites.

It was the purpose of the Criminal Enterprise to possess millions of dollars' worth of stolen property to enable all of the members of the Criminal Enterprise to profit from the resale of the stolen property – all while concealing the origin of the illicit proceeds. It was also the purpose of the Criminal Enterprise to reinvest a portion of the proceeds generated from the sale of the stolen property into the

procurement of additional stolen property so that members of the Criminal Enterprise could resell the stolen property on RUBINOV's Treasure-Deals-USA eBay site and generate additional profits. This ongoing scheme resulted in the Criminal Enterprise possessing stolen property valued at **\$3,806,192** and laundering **\$1,373,728** in illicit proceeds through RUBINOV's eBay, PayPal, and Bank of America accounts.

PATTERN OF CRIMINAL ACTIVITY

During the period of this offense, the defendants RONI RUBINOV, YURIY KHODZHANDIYEV, RAFIK ISRAILOV, AKASYA YASAROGLU, LYUDMILA YUSHUVAYEV A/K/A "LYUDMILA YADEGAR" A/K/A "LUDI", ERICA ZAMBRANO, FATHI NEGADI, CAROLINE GALLEGO, RAMDASS RAMKISSOON A/K/A "PAULIE", ZAMIRA SHAGANOVA, ANA BALACEANU, and CHARLES HARMAN, along with other persons known and unknown, with intent to participate in and advance the affairs of the Criminal Enterprise and pursuant to a common scheme and plan, engaged in conduct constituting or was criminally liable for the following criminal acts included within a pattern of criminal activity.

PATTERN ACT 1

The defendants, **RONI RUBINOV, YURIY KHODZHANDIYEV, RAFIK ISRAILOV, AKASYA YASAROGLU, LYUDMILA YUSHUVAYEV A/K/A "LYUDMILA YADEGAR" A/K/A "LUDI", ERICA ZAMBRANO, FATHI NEGADI, CAROLINE GALLEGO, RAMDASS RAMKISSOON A/K/A "PAULIE", ZAMIRA SHAGANOVA, ANA BALACEANU, and CHARLES**

HARMAN, acting in concert with each other and others both known and unknown to the Grand Jury, committed the crime of **Criminal Possession of Stolen Property in the First Degree, in violation of New York State Penal Law § 165.54**, as follows:

The defendants, from on or about and between **January 1, 2017 and January 8, 2020, in the County of New York, the County of Queens and elsewhere inside and outside the State of New York**, knowingly possessed stolen property, with intent to benefit themselves or persons other than the owners thereof, or impede the recovery by the owners thereof, and when the value of the property exceeded one million dollars.

PATTERN ACT 2

The defendants, **RONI RUBINOV, YURIY KHODZHANDIYEV, RAFIK ISRAILOV, AKASYA YASAROGLU, LYUDMILA YUSHUVAYEV A/K/A “LYUDMILA YADEGAR” A/K/A “LUDI”, ERICA ZAMBRANO, FATHI NEGADI, CAROLINE GALLEGRO, RAMDASS RAMKISSOON A/K/A “PAULIE”, ZAMIRA SHAGANOVA, ANA BALACEANU, and CHARLES HARMAN**, acting in concert with each other and others both known and unknown to the Grand Jury, committed the crime of **Scheme to Defraud in the First Degree, in violation of New York State Penal Law § 190.65(1)(b)**, as follows:

The defendants, from on or about and between **January 1, 2017, and January 8, 2020, in the County of New York, the County of Queens and elsewhere inside and outside the State of New York**, engaged in a scheme

constituting a systematic ongoing course of conduct with intent to defraud more than one person or to obtain property from more than one person by false or fraudulent pretenses, representations or promises, and so obtained property with value in excess of one thousand dollars from one or more such persons, to wit: CVS, Walgreens, Duane Reade, Macy's, Bloomingdales, Louis Vuitton, Lowe's and Banana Republic, Brooks Brothers, Sephora, Rite Aid, Neiman Marcus, Saks 5th Avenue, and Sunglass Hut.

PATTERN ACT 3

The defendants, **RONI RUBINOV, YURIY KHODZHANDIYEV, RAFIK ISRAILOV, AKASYA YASAROGLU, LYUDMILA YUSHUVAYEV A/K/A "LYUDMILA YADEGAR" A/K/A "LUDI", ERICA ZAMBRANO, FATHI NEGADI, CAROLINE GALLEGO, RAMDASS RAMKISSOON A/K/A "PAULIE", ZAMIRA SHAGANOVA, ANA BALACEANU, and CHARLES HARMAN**, acting in concert with each other and others both known and unknown to the Grand Jury, committed the crime of **Money Laundering in the First Degree**, in violation of **New York State Penal Law § 470.20(1)(b)(i)(A)(iii)**, as follows:

The defendants, from on or about and between **January 1, 2017, and January 8, 2020**, in the **County of New York, the County of Queens and elsewhere inside and outside the State of New York**, knowing that the property involved in one or more financial transactions represented the proceeds of a class B felony, to wit: **Criminal Possession of Stolen Property in the First Degree**; they conducted one or more such financial transactions which in fact involve the proceeds

of any such felony, with intent to promote the carrying on of specified criminal conduct and the total value of the property involved in such financial transaction or transactions exceeded one million (1,000,000) dollars.

PATTERN ACT 4

The defendants, **RONI RUBINOV, YURIY KHODZHANDIYEV, RAFIK ISRAILOV, AKASYA YASAROGLU, LYUDMILA YUSHUVAYEV A/K/A “LYUDMILA YADEGAR” A/K/A “LUDI”, ERICA ZAMBRANO, FATHI NEGADI, CAROLINE GALLEGO, RAMDASS RAMKISSOON A/K/A “PAULIE”, ZAMIRA SHAGANOVA, ANA BALACEANU, and CHARLES HARMAN**, acting in concert with each other and others both known and unknown to the Grand Jury, committed the crime of **Money Laundering in the First Degree**, in violation of **New York State Penal Law § 470.20(1)(b)(ii)(A)(iii)**, as follows:

The defendants, from on or about and between **January 1, 2017, and January 8, 2020**, in the **County of New York, the County of Queens and elsewhere inside and outside the State of New York**, knowing that the property involved in one or more financial transactions represented the proceeds of a class B felony, to wit: **Criminal Possession of Stolen Property in the First Degree**; they conducted one or more such financial transactions which in fact involve the proceeds of any such felony, knowing that the transaction or transactions in whole or in part were designed to conceal or disguise the nature, the location, the source, the ownership or the control of the proceeds of specified criminal conduct and the total

value of the property involved in such financial transaction or transactions exceeded one million (1,000,000) dollars.

PATTERN ACT 5

The defendants, **RONI RUBINOV, YURIY KHODZHANDIYEV, LYUDMILA YUSHUVAYEV A/K/A “LYUDMILA YADEGAR” A/K/A “LUDI”, ERICA ZAMBRANO, and ZAMIRA SHAGANOVA**, acting in concert with each other and others both known and unknown to the Grand Jury, committed the crime of **Money Laundering in the Third Degree, in violation of New York State Penal Law § 470.10(1)(b)(ii)(A)(iii)**, as follows:

The defendants, from on or about and between **January 1, 2017, and January 8, 2020**, in the **County of New York, the County of Queens and elsewhere inside and outside the State of New York**, knowing that the property involved one or more financial transactions represented the proceeds of criminal conduct, they conducted one or more such financial transactions which in fact involve the proceeds of specified criminal conduct, knowing that the transaction or transactions in whole or in part were designed to conceal or disguise the nature, the location, the source, the ownership or the control of the proceeds of criminal conduct and the total value of the property involved in such financial transaction or transactions exceeded fifty thousand (50,000) dollars.

PATTERN ACT 6

The Grand Jury of New York County, by this Indictment, accuses the defendants, **RONI RUBINOV, YURIY KHODZHANDIYEV, RAFIK ISRAILOV,**

AKASYA YASAROGLU, LYUDMILA YUSHUVAYEV A/K/A “LYUDMILA YADEGAR” A/K/A “LUDI”, ERICA ZAMBRANO, FATHI NEGADI, CAROLINE GALLEGO, RAMDASS RAMKISSOON A/K/A “PAULIE”, ZAMIRA SHAGANOVA, ANA BALACEANU, CHARLES HARMAN, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Conspiracy in the Fourth Degree, in violation of New York State Penal Law § 105.10(1)**, committed as follows:

The defendants, from on or about and between **January 1, 2017, and January 8, 2020**, in the **County of New York, the County of Queens and elsewhere inside and outside the State of New York**, as pleaded in Count 2 of this Indictment, intending that conduct constituting a class B felony be performed, to wit: **Criminal Possession of Stolen Property in the First Degree, in violation of New York State Penal Law § 165.54**, agreed with one or more persons to engage in or cause the performance of such conduct.

PATTERN ACT 7

The Grand Jury of New York County, by this Indictment, accuses the defendants, **RONI RUBINOV, YURIY KHODZHANDIYEV, LYUDMILA YUSHUVAYEV A/K/A “LYUDMILA YADEGAR” A/K/A “LUDI”, ERICA ZAMBRANO and ZAMIRA SHAGANOVA**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Conspiracy in the Fourth Degree, in violation of New York State Penal Law § 105.10(3)**, committed as follows:

The defendants, from on or about and between **January 1, 2017, and January 8, 2020**, in the **County of New York, the County of Queens and elsewhere inside and outside the State of New York**, as pleaded in Count 3 of this Indictment, intending that conduct constituting the felony of money laundering in the third degree as defined in section 470.10 of this chapter be performed, agreed with one or more persons to engage in or cause the performance of such conduct.

COUNT 2

The Grand Jury of New York County, by this Indictment, accuses the defendants, **RONI RUBINOV, YURIY KHODZHANDIYEV, RAFIK ISRAILOV, AKASYA YASAROGLU, LYUDMILA YUSHUVAYEV A/K/A “LYUDMILA YADEGAR” A/K/A “LUDI”, ERICA ZAMBRANO, FATHI NEGADI, CAROLINE GALLEGO, RAMDASS RAMKISSOON A/K/A “PAULIE”, ZAMIRA SHAGANOVA, ANA BALACEANU, CHARLES HARMAN, PATRICE COLLINS, SALIMOU DABO, JERARD IAMUNNO A/K/A “ITALIANO”, LANCE FAIR, CAYLA ROMAN, KATHLEEN RAGUSA, GREGORY ROOSA, JORDAN CAVALIERO, THOMAS NICHOLAS A/K/A “TOMMY”, EVEYLON FERGUSON, KEVIN RUTHENBECK, DAVID HIGGINS, JUSTIN PEPCHINSKI, DANIEL WEBER, PATRICK CASEY, SHAWN HERALD, SHANNON WINKLER A/K/A “SHEA”, JAMES BILIS A/K/A “SLIM”, SAMANTHA COTRONEO, HERMAN ELLIS, CHRIS PLAMONDON, JOSHUA DVORIN, REAGAN CALLIHAN A/K/A “MEAGAN”, SHARIF WARNER, CHASE BUNT, JABARI SMITH, MICHAEL MORRIS and ALONZO**

ROBERTS, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Conspiracy in the Fourth Degree, in violation of New York State Penal Law § 105.10(1)**, committed as follows:

The defendants, from on or about and between **January 1, 2017, and January 8, 2020**, in the **County of New York, the County of Queens and elsewhere inside and outside the State of New York**, intending that conduct constituting a class B felony be performed, to wit: **Criminal Possession of Stolen Property in the First Degree, in violation of New York State Penal Law § 165.54**, agreed with one or more persons to engage in or cause the performance of such conduct.

PREAMBLE

It was the purpose of this conspiracy to acquire, possess, and sell stolen property, in New York County, Queens County and other jurisdictions inside and outside the State of New York.

It was the role of **RONI RUBINOV, YURIY KHODZHANDIYEV, RAFIK ISRAILOV, AKASYA YASAROGLU, LYUDMILA YUSHUVAYEV A/K/A “LYUDMILA YADEGAR” A/K/A “LUDI”, ERICA ZAMBRANO, FATHI NEGADI, CAROLINE GALLEGRO, RAMDASS RAMKISSOON A/K/A “PAULIE”, ZAMIRA SHAGANOVA, ANA BALACEANU, and CHARLES HARMAN** to carry out the business of the Criminal Enterprise as described in Count 1 of this Indictment.

It was the role of **PATRICE COLLINS** to post stolen property to RUBINOV's Treasure-Deals-USA Store and to organize and inventory stolen property at the Queens Stash Locations.

It was the role of **SALIMOU DABO, JERARD IAMUNNO A/K/A "ITALIANO", LANCE FAIR, CAYLA ROMAN, KATHLEEN RAGUSA, GREGORY ROOSA, JORDAN CAVALIERO, THOMAS NICHOLAS A/K/A "TOMMY", EVEYLON FERGUSON, KEVIN RUTHENBECK, DAVID HIGGINS, JUSTIN PEPCHINSKI, DANIEL WEBER, PATRICK CASEY, SHAWN HERALD, SHANNON WINKLER A/K/A "SHEA", JAMES BILIS A/K/A "SLIM", SAMANTHA COTRONEO, HERMAN ELLIS, CHRIS PLAMONDON, JOSHUA DVORIN, REAGAN CALLIHAN A/K/A "MEAGAN", SHARIF WARNER, CHASE BUNT, MICHAEL MORRIS, JABARI SMITH and ALONZO ROBERTS** to act as "boosters," as described in Count 1 of this Indictment and steal property from various drug stores and department stores and sell that stolen property to RUBINOV at a severely discounted price.

It was also part of this conspiracy for members of the conspiracy to communicate with each other and others over cellular telephones using codes and communicating in a guarded, cryptic manner.

OVERT ACTS:

In the furtherance of the Conspiracy, and to effect the objects thereof, from on or about and between January 1, 2017, and January 8, 2020, the following overt acts, among others, were committed:

1. On July 23, 2017, RUBINOV began using a PayPal Account belonging to one of his former employees, Irina Hutton, to circumvent limitations on the Roni Rubinov, Inc. PayPal Account as a result of PayPal limiting the Roni Rubinov, Inc. PayPal account for explosive growth triggering PayPal compliance to review the transactions on the account.

2. On August 8, 2017, RUBINOV began using the Romanov Buyers, Inc. PayPal Account after PayPal limited the Irina Hutton PayPal account for explosive growth triggering PayPal compliance to review the transactions on that account.

3. On December 8, 2017, RUBINOV sold an Amazon Echo Dot Second Generation for \$34.49 on the Treasure-Deals-USA eBay account to a customer who then, on January 7, 2018, sent a message to RUBINOV stating, in sum and substance “So I contacted PayPal about the return situation and they are allowing me to do a return..i told you the item was not new and you did not believe me.. I even called amazon and they said they item I purchased from you, the amazon echo was reported stolen.. I am opened a scam case on you through ebay, PayPal, and amazon”.

4. On or about November 16, 2019, RONI RUBINOV engaged in a phone conversation with YURIY KHODZHANDIYEV whereby he stated, in sum and substance, “Yura, there is this asshole in 402....He brought some bullshit. Headphones...What kind of questions are you asking? He stole it. You’re asking how much he bought it for”. During the same phone conversation, RONI RUBINOV communicated with ZAMIRA SHAGANOVA whereby he stated, in sum and

substance, “If it’s a good, unopened box, give him \$50. No ID is needed if it looks like... if it doesn’t look like a fake. If it is a sealed box—.”

5. On or about November 1, 2019, YURIY KHODZHANDIYEV was inside of 71 W 47th Street, Suite 402A where he purchased 18 assorted stolen property items from Shawn Herald in exchange for \$50 cash.

6. On or about December 10, 2019, RAFIK ISRAILOV was inside of 71 W 47th Street, Suite 402A whereby he stated to REAGAN CALLIHAN A/K/A “MEAGAN”, in sum and substance, “I’ll give you seven percent”. Thereafter, RAFIK ISRAILOV paid REAGAN CALLIHAN A/K/A “MEAGAN” \$190 cash in exchange for assorted stolen Brooks Brothers clothing having a retail value of \$2,800.

7. On or about, September 13, 2019, AKASYA YASAROGLU engaged in a phone conversation with RONI RUBINOV, whereby she asked, in sum and substance, “Hello Roni, can we take the clothes without alarms?...Okay can we take the clothes that doesn’t have alarms?...Yeah I clean up then I separate them, I put them separate in the bag...Okay and also, one more thing, the bathroom has also creams, some creams”.

8. On or about September 13, 2019, LYUDMILA YUSHUVAYEV A/K/A “LYUDMILA YADEGAR” A/K/A “LUDI” engaged in a phone conversation with RONI RUBINOV whereby she stated, in sum and substance, “Jordan is here...Add up your total. Fourteen.” RONI RUBINOV replied, in sum and substance, “1,400. Take the calculator, multiply 1,400 times seven percent...Give her 90 dollars even.” LYUDMILA YUSHUVAYEV A/K/A “LYUDMILA YADEGAR” A/K/A “LUDI” stated,

in sum and substance, “Sure” ...Can you remove the stickers? Yeah? She’s going to remove the stickers”.

9. On November 27, 2019, ERICA ZAMBRANO was inside of 67 W 47th Street, whereby she engaged in a conversation with RONI RUBINOV and LYUDMILA YUSHUVAYEV A/K/A “LYUDMILA YADEGAR” A/K/A “LUDI” during which RONI RUBINOV stated, in sum and substance, “Yes so, my friend Robert, he tells, you guys are doing so much work by hand, by paper, old-fashioned. It could be done much quicker. I don’t know” and during which LYUDMILA YUSHUVAYEV A/K/A “LYUDMILA YADEGAR” A/K/A “LUDI” replied in sum and substance, “but you don’t want it... you can easily burn it. Nobody will know anything... burn all of this if they were coming” and ERICA ZAMBRANO stated, in sum and substance, “shred it”.

10. On November 11, 2019, FATHI NEGADI unloaded several bags filled with stolen property from RONI RUBINOV’s Vehicle into the Stash House.

11. On October 21, 2019, CAROLINE GALLEGO was inside of 71 W 47th Street, Suite 402A whereby she helped LANCE FAIR unload 99 assorted stolen creams onto the countertop inside of Suite 402A. CAROLINE GALLEGO stated to LANCE FAIR, in sum and substance, “Can I look at your merchandise – because I organize it. Try not to crush the boxes because it’s hard to resell.” LANCE FAIR replied, in sum and substance, “When I was in the store everything was falling on the floor and someone was yelling ‘thief, thief, thief.’”

12. On December 14, 2019, ANA BALACEANU gave PATRICE COLLINS the Treasure-Deals-USA eBay account password.

13. On October 30, 2019, RAMDASS RAMKISSOON A/K/A “PAULIE” was inside of 71 W 47th Street, Suite 402A whereby he removed several security tags from stolen clothing items.

14. On January 3, 2020, while inside of 67 W 47th Street, ZAMIRA SHAGANOVA paid JABARI SMITH \$13,000 in cash in exchange for a stolen Rolex watch worth approximately \$18,600.

15. On October 6, 2019, ANA BALACEANU engaged in a phone conversation with RONI RUBINOV, whereby she asked, in sum and substance, “I just wanted to ask you, the 46 sets of the No. 7, did they bring it to your house to take it tomorrow?” to which RONI RUBINOV replied, in sum and substance, “No, I have it already in Manhattan”.

16. On September 18, 2019, CHARLES HARMAN engaged in a phone conversation with RONI RUBINOV whereby he stated, in sum and substance, “Hey just so you know I had a good meeting with Ana this morning we did a screen share on Amazon. So, she’ll be probably reaching out to you about how we get our products listed because they all require authorization. Facial creams, Starbucks, everyone we tried. So, you’re going to have to be creative figure out how to show a receipt.”

17. On October 15, 2019, SALIMOU DABO was outside of 67 W 47th Street whereby he handed RONI RUBINOV a stack of stolen Amazon gift cards.

18. On October 7, 2019, JERARD IAMUNNO A/K/A "ITALIANO" was inside of 71 W 47th Street, Suite 402A, whereby he sold five pairs of stolen sunglasses, with a combined retail value of \$895 in exchange for \$100 cash.

19. On October 21, 2019, LANCE FAIR was inside of 71 W 47th Street, Suite 402A, whereby he stated, in sum and substance, "I bring you hundreds of dollars a day, I bring him everything he wants...." Thereafter LANCE FAIR sold 136 assorted stolen drug store items in exchange for \$100 cash.

20. On October 17, 2019, CAYLA ROMAN engaged in a phone conversation with RONI RUBINOV whereby she stated, in sum and substance, "I got arrested they want to charge me with a D felony because there was so much stuff...and I have a jacket I have – this is the last jacket I have but I want more than usual and I want to know if you could do it so I could do what I have to do". Thereafter, CAYLA ROMAN sold a stolen Neiman Marcus jacket with a retail value of \$2,600 in exchange for \$500 cash.

21. On October 23, 2019, KATHLEEN RAGUSA was inside of 71 W 47th Street, Suite 402A whereby she stated, in sum and substance, "the employee saw me take items and said, 'that's not fair' and was laughing". Thereafter, KATHLEEN RAGUSA sold 70 assorted CVS items in exchange for \$30 cash.

22. On October 14, 2019, GREGORY ROOSA was inside of 71 W 47th Street, Suite 402A whereby he stated, in sum and substance, "I am a thief, but I have honor." Thereafter GREGORY ROOSA pointed to the bag of stolen merchandise he brought

and stated, in sum and substance, “this is called probable cause”. GREGORY ROOSA proceeded to sell 43 assorted stolen drug store items in exchange for \$30 cash.

23. On December 29, 2019, JORDAN CAVALIERO was inside of 71 W 47th Street, Suite 402A, whereby she stated, in sum and substance, “I don’t know, I just steal it... I am not going to steal it and get charged with Grand Larceny if I don’t get paid enough”. Thereafter, JORDAN CAVALIERO sold two stolen leather jackets with a combined retail value of \$2,000 in exchange for 200 cash.

24. On September 2, 2019, THOMAS NICHOLAS A/K/A “TOMMY” sent a text message to RONI RUBINOV, whereby he stated, in sum and substance, “I need to get back to work I take these for a reason not just because I want to. I take only the more expensive ones. Every time.”

25. On November 12, 2019, EVEYLON FERGUSON was inside of 71 W 47th Street, Suite 402A, whereby she sold four stolen clothing items with a combined retail value of \$3,393 in exchange for \$220 cash.

26. On October 21, 2019, KEVIN RUTHENBECK was inside of 71 W 47th Street, Suite 402A, whereby he stated, in sum and substance, “I bring 10 to 12,000 worth of clothes.” Thereafter KEVIN RUTHENBECK sold three stolen pieces of clothing with a combined retail value of \$3,060 in exchange for \$200 cash.

27. On October 7, 2019, DAVID HIGGINS was inside of 71 W 47th Street, Suite 402A whereby he stated, in sum and substance, “This is grand larceny times two”. Thereafter, DAVID HIGGINS sold 15 pairs of stolen Gap jeans with a combined retail value of \$1,920 in exchange for \$150 cash.

28. On October 10, 2019, JUSTIN PEPCHINSKI was inside of 71 W 47th Street, Suite 402A, whereby he stated, in sum and substance, "...it took me three hours to get these, I had to deal with the workers..." Thereafter, JUSTIN PEPCHINSKI sold assorted stolen clothing items with a combined retail value of \$2,300 in exchange for \$210 cash.

29. On December 11, 2019, DANIEL WEBER was inside of 71 W 47th Street, Suite 402A, whereby he sold 27 assorted stolen drug store items in exchange for \$40 cash.

30. On October 15, 2019, PATRICK CASEY was inside of 71 W 47th Street, Suite 402A, whereby he sold 28 assorted stolen drug store items in exchange for \$75 cash.

31. On January 5, 2020, SHAWN HERALD was inside of 71 W 47th Street, Suite 402A, whereby he sold 37 assorted stolen condoms in exchange for \$40.

32. On November 14, 2019, SHANNON WINKLER A/K/A "SHEA" was inside of 71 W 47th Street, Suite 402A whereby she smashed security boxes containing assorted drug store items. Thereafter, SHANNON WINKLER A/K/A "SHEA" sold 42 assorted stolen drug store items in exchange for \$80 cash.

33. On December 12, 2019, JAMES BILIS A/K/A "SLIM" was inside of 71 W 47th Street, Suite 402A, whereby he stated, in sum and substance, "I was one of the first ones, I basically started it". Thereafter JAMES BILIS A/K/A "SLIM" sold stolen boxed and roll-on perfumes, boxed chocolates, watches, and assorted costume jewelry in exchange for \$130 cash.

34. On November 19, 2019, SAMANTHA COTRONEO was inside of 71 W 47th Street, Suite 402A, whereby she sold 84 assorted stolen cosmetic items in exchange for \$100 cash.

35. On October 26, 2019, HERMAN ELLIS was inside of 71 W 47th Street, Suite 402A, whereby he sold a stolen white Fender guitar with a retail value of \$1,549.97 in exchange for \$130 cash.

36. On November 17, 2019, CHRISTOPHER PLAMONDON was inside of 71 W 47th Street, Suite 402A, whereby he sold two pairs of stolen Gucci sunglasses with a combined retail value of \$840 in exchange for \$140 cash.

37. On December 13, 2019, JOSHUA DVORIN was inside of 71 W 47th Street, Suite 402A, whereby he sold 61 assorted drug store items in exchange for \$90 cash.

38. On December 21, 2019, REAGAN CALLIHAN A/K/A "MEAGAN" took the New York City Subway to the Forest Hills - 71st Avenue stop in Queens County, New York to sell a stolen Fendi dress with a retail value of \$2,000.

39. On December 19, 2019, SHARIF WARNER was inside of 71 W 47th Street, Suite 402A, whereby he sold 15 stolen belts, one pair of stolen sneakers and two stolen watches in exchange for \$30 cash.

40. On January 2, 2020, CHASE BUNT was inside of 71 W 47th Street, Suite 402A, whereby he sold assorted stolen clothing items from Barney's in exchange for \$300 cash.

41. On January 3, 2020, JABARI SMITH engaged in a phone conversation with RONI RUBINOV, whereby he stated, in sum and substance, “Brand new Datejust, Brand new Datejust. Straight from Rolex... Yo 80% I’m doing on it. Nothing less I ain’t....” Thereafter, JABARI SMITH was inside of 67 W 47th Street, whereby he sold a stolen Rolex Datejust watch with a retail value of \$18,600 in exchange for \$13,000 cash.

42. On December 20, 2019, MICHAEL MORRIS was inside of 71 W 47th Street, Suite 402A, whereby he sold three stolen Louis Vuitton purses with a retail value of \$8,380.

43. On October 26, 2019, ALONZO ROBERTS was in the vicinity of 67 W 47th Street, whereby he sold two Chanel Flapbag purses with a combined retail value of \$6,300.

COUNT 3

The Grand Jury of New York County, by this Indictment, accuses the defendants, **RONI RUBINOV, YURIY KHODZHANDIYEV, LYUDMILA YUSHUVAYEV A/K/A “LYUDMILA YADEGAR” A/K/A “LUDI”, ERICA ZAMBRANO** and **ZAMIRA SHAGANOVA**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Conspiracy in the Fourth Degree**, in violation of New York State Penal Law § 105.10(3), committed as follows:

The defendants, from on or about and between **January 1, 2017, and January 8, 2020**, in the **County of New York, the County of Queens and elsewhere inside and outside the State of New York**, intending that conduct constituting the felony of money laundering in the third degree as defined in section 470.10 of this chapter be performed, agreed with one or more persons to engage in or cause the performance of such conduct.

PREAMBLE

It was the purpose of this conspiracy to conceal or disguise the nature, location, the source, the ownership or the control of proceeds of criminal conduct which included financial transactions involving property having a total value exceeding fifty thousand dollars, in New York County, Queens County and other jurisdictions inside and outside the State of New York.

It was the role of **RONI RUBINOV, YURIY KHODZHANDIYEV, LYUDMILA YUSHUVAYEV A/K/A “LYUDMILA YADEGAR” A/K/A “LUDI”, ERICA ZAMBRANO and ZAMIRA SHAGANOVA** to carry out the business of the Criminal Enterprise as described in Count 1 of this Indictment.

It was also part of this conspiracy for members of the conspiracy to communicate with each other and others over cellular telephones using codes and communicating in a guarded, cryptic manner.

OVERT ACTS:

In the furtherance of the Conspiracy, and to effect the objects thereof, from on or about and between January 1, 2017, and January 8, 2020, the following overt acts, among others, were committed:

1. On December 30, 2019, RONI RUBINOV engaged in the phone conversation with LYUDMILA YUSHUVAYEV A/K/A “LYUDMILA YADEGAR” A/K/A “LUDI”, whereby she asked, in sum and substance, “Roni, you’re giving 120 for the gift card?” to which RONI RUBINOV replied, in sum and substance, “Yeah, \$200 in debit... just process 200 in debit... make a receipt for purchase of silver coins....”

2. On April 4, 2019, YURIY KHODZHANDIYEV, was inside 71 W 47th Street, Suite 402A and bought three stolen Vanilla Visa cards with a value of \$450 in exchange for \$210 cash.

3. On May 13, 2019, YURIY KHODZHANDIYEV, was inside 71 W 47th Street, Suite 402A and bought one stolen Vanilla Visa card with a value of \$300 in exchange for \$150 cash, and issued a receipt stating, in sum and substance, “\$300 in silver bars”.

4. On December 26, 2019, RONI RUBINOV, ERICA ZAMBRANO and LYUDMILA YUSHUVAYEV A/K/A “LYUDMILA YADEGAR” A/K/A “LUDI” were inside of 67 W 47th Street. RONI RUBINOV handed ERICA ZAMBRANO a stack of gift cards and she proceeded to check the balances of the gift cards. LYUDMILA YUSHUVAYEV A/K/A “LYUDMILA YADEGAR” A/K/A “LUDI” stated, in sum and substance, “I already checked them, they have \$100 each”. Thereafter, RONI RUBINOV asked LYUDMILA YUSHUVAYEV A/K/A “LYUDMILA YADEGAR”

A/K/A “LUDI” to process the gift cards, at which point LYUDMILA YUSHUVAYEV A/K/A “LYUDMILA YADEGAR” A/K/A “LUDI” began swiping the gift cards through the merchant account terminal inside of 67 W 47th Street.

5. On December 24, 2019, ERICA ZAMBRANO engaged in a phone conversation with RONI RUBINOV, whereby she stated, in sum and substance, “...there are 43 cards for \$100 each”.

6. On December 14, 2019, ZAMIRA SHAGANOVA engaged in a phone conversation with RONI RUBINOV, whereby she stated, in sum and substance, “Someone brought three Visa cards, black... \$100 each there is a fee, six dollars for each card.” RONI RUBINOV replied, in sum and substance, “Okay, swipe it like debit”.

7. On December 12, 2019, ZAMIRA SHAGANOVA engaged in a phone conversation with RONI RUBINOV, whereby RONI RUBINOV stated, in sum and substance, “If he gives you ID, you can take five cards from him and give him the 70%. Try give him 60%, but if it doesn’t work, give him 70%. Make a receipt that he’s purchasing for a 1,000 divided by 18. 1,000 divided by 18, that he’s purchasing pure silver bars. Okay? For investment purposes. Then have him sign that.” Zamira replied, in sum and substance, “Okay”.

COUNT 4

The Grand Jury of New York County, by this Indictment, accuses the defendants, **RONI RUBINOV, YURIY KHODZHANDIYEV, RAFIK ISRAILOV, AKASYA YASAROGLU, LYUDMILA YUSHUVAYEV A/K/A “LYUDMILA**

YADEGAR” A/K/A “LUDI”, ERICA ZAMBRANO, FATHI NEGADI, CAROLINE GALLEG0, RAMDASS RAMKISSOON A/K/A “PAULIE”, ZAMIRA SHAGANOVA, ANA BALACEANU, CHARLES HARMAN, PATRICE COLLINS, SALIMOU DABO, JERARD IAMUNNO A/K/A “ITALIANO”, LANCE FAIR, CAYLA ROMAN, KATHLEEN RAGUSA, GREGORY ROOSA, JORDAN CAVALIERO, THOMAS NICHOLAS A/K/A “TOMMY”, EVEYLON FERGUSON, KEVIN RUTHENBECK, DAVID HIGGINS, JUSTIN PEPCHINSKI, DANIEL WEBER, PATRICK CASEY, SHAWN HERALD, SHANNON WINKLER A/K/A “SHEA”, JAMES BILIS A/K/A “SLIM”, SAMANTHA COTRONEO, HERMAN ELLIS, CHRIS PLAMONDON, JOSHUAUA DVORIN, REAGAN CALLIHAN A/K/A “MEAGAN”, SHARIF WARNER, CHASE BUNT, JABARI SMITH, MICHAEL MORRIS and ALONZO ROBERTS, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Criminal Possession of Stolen Property in the First Degree, in violation of New York State Penal Law § 165.54**, committed as follows:

The defendants, from on or about and between **January 1, 2017, and January 8, 2020, in the County of New York, the County of Queens and elsewhere inside and outside the State of New York**, knowingly possessed stolen property, with intent to benefit themselves or persons other than the owners thereof, or impede the recovery by the owners thereof, and when the value of the property exceeded one million dollars.

COUNT 5

The Grand Jury of New York County, by this Indictment, accuses the defendants, **RONI RUBINOV, YURIY KHODZHANDIYEV, RAFIK ISRAILOV, AKASYA YASAROGLU, LYUDMILA YUSHUVAYEV A/K/A “LYUDMILA YADEGAR” A/K/A “LUDI”, ERICA ZAMBRANO, FATHI NEGADI, CAROLINE GALLEGGO, RAMDASS RAMKISSOON A/K/A “PAULIE”, ZAMIRA SHAGANOVA, ANA BALACEANU, CHARLES HARMAN, PATRICE COLLINS, SALIMOU DABO, JERARD IAMUNNO A/K/A “ITALIANO”, LANCE FAIR, CAYLA ROMAN, KATHLEEN RAGUSA, GREGORY ROOSA, JORDAN CAVALIERO, THOMAS NICHOLAS A/K/A “TOMMY”, EVEYLON FERGUSON, KEVIN RUTHENBECK, DAVID HIGGINS, JUSTIN PEPCHINSKI, DANIEL WEBER, PATRICK CASEY, SHAWN HERALD, SHANNON WINKLER A/K/A “SHEA”, JAMES BILIS A/K/A “SLIM”, SAMANTHA COTRONEO, HERMAN ELLIS, CHRIS PLAMONDON, JOSHUA DVORIN, REAGAN CALLIHAN A/K/A “MEAGAN”, SHARIF WARNER, CHASE BUNT, JABARI SMITH, MICHAEL MORRIS and ALONZO ROBERTS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Scheme to Defraud in the First Degree, in violation of New York State Penal Law § 190.65(1)(b)**, committed as follows:

The defendants, from on or about and between **January 1, 2017, and January 8, 2020**, in the **County of New York, the County of Queens and elsewhere inside and outside the State of New York**, engaged in a scheme

constituting a systematic ongoing course of conduct with intent to defraud more than one person or to obtain property from more than one person by false or fraudulent pretenses, representations or promises, and so obtained property with value in excess of one thousand (1,000) dollars from one or more such persons, to wit: Macy's, Inc., CVS Health Corporation, and other corporate retail entities.

COUNT 6

The Grand Jury of New York County, by this Indictment, accuses the defendants, **RONI RUBINOV, YURIY KHODZHANDIYEV, RAFIK ISRAILOV, AKASYA YASAROGLU, LYUDMILA YUSHUVAYEV A/K/A "LYUDMILA YADEGAR" A/K/A "LUDI", ERICA ZAMBRANO, FATHI NEGADI, CAROLINE GALLEGO, RAMDASS RAMKISSOON A/K/A "PAULIE", ZAMIRA SHAGANOVA, ANA BALACEANU, CHARLES HARMAN, and PATRICE COLLINS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Money Laundering in the First Degree, in violation of New York State Penal Law § 470.20(1)(b)(i)(A)(iii)**, as follows:

The defendants, from on or about and between **January 1, 2017, and January 8, 2020**, in the **County of New York, the County of Queens and elsewhere inside and outside the State of New York**, knowing that the property involved in one or more financial transactions represented the proceeds of a class B felony, to wit: Criminal Possession of Stolen Property in the First Degree; they conducted one or more such financial transactions which in fact involve the proceeds of any such felony, with intent to promote the carrying on of specified criminal

conduct and the total value of the property involved in such financial transaction or transactions exceeded one million (1,000,000) dollars.

COUNT 7

The Grand Jury of New York County, by this Indictment, accuses the defendants, **RONI RUBINOV, YURIY KHODZHANDIYEV, RAFIK ISRAILOV, AKASYA YASAROGLU, LYUDMILA YUSHUVAYEV A/K/A “LYUDMILA YADEGAR” A/K/A “LUDI”, ERICA ZAMBRANO, FATHI NEGADI, CAROLINE GALLEGO, RAMDASS RAMKISSOON A/K/A “PAULIE”, ZAMIRA SHAGANOVA, ANA BALACEANU CHARLES HARMAN, and PATRICE COLLINS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Money Laundering in the First Degree, in violation of New York State Penal Law § 470.20(1)(b)(ii)(A)(iii)**, as follows:

The defendants, from on or about and between **January 1, 2017, and January 8, 2020**, in the **County of New York, the County of Queens and elsewhere inside and outside the State of New York**, knowing that the property involved in one or more financial transactions represented the proceeds of a class B felony, to wit: Criminal Possession of Stolen Property in the First Degree; they conducted one or more such financial transactions which in fact involve the proceeds of any such felony, knowing that the transaction or transactions in whole or in part were designed to conceal or disguise the nature, the location, the source, the ownership or the control of the proceeds of specified criminal conduct and the total

value of the property involved in such financial transaction or transactions exceeded one million (1,000,000) dollars.

COUNT 8

The Grand Jury of New York County, by this Indictment, accuses the defendants, **RONI RUBINOV, YURIY KHODZHANDIYEV, LYUDMILA YUSHUVAYEV A/K/A “LYUDMILA YADEGAR” A/K/A “LUDI”, ERICA ZAMBRANO and ZAMIRA SHAGANOVA**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Money Laundering in the Third Degree, in violation of New York State Penal Law § 470.10(1)(b)(ii)(A)(iii)**, as follows:

The defendants, from on or about and between **January 1, 2017, and January 8, 2020**, in the **County of New York, the County of Queens and elsewhere inside and outside the State of New York**, knowing that the property involved one or more financial transactions represented the proceeds of criminal conduct, they conducted one or more such financial transactions which in fact involve the proceeds of specified criminal conduct, knowing that the transaction or transactions in whole or in part were designed to conceal or disguise the nature, the location, the source, the ownership or the control of the proceeds of criminal conduct and the total value of the property involved in such financial transaction or transactions exceeded fifty thousand (50,000) dollars.

COUNT 9

The Grand Jury of New York County, by this Indictment, accuses the defendants, **RONI RUBINOV, YURIY KHODZHANDIYEV, AKASYA YASAROGLU, ZAMIRA SHAGANOVA, JAMES BILIS A/K/A "SLIM", JUSTIN PEPCHINSKI, KATHLEEN RAGUSA** and **JACQUELINE ALESSI**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Conspiracy in the Fifth Degree, in violation of New York State Penal Law § 105.05(1)**, committed as follows:

The defendants, from on or about and between **August 30, 2019 to on or about January 7, 2020**, in the **County of New York, the County of Queens and elsewhere inside and outside the State of New York**, intending that conduct constituting a felony be performed, to wit: **Criminal Possession of Stolen Property in the Fourth Degree, in violation of New York State Penal Law § 165.45(2)**, agreed with one or more persons to engage in or cause the performance of such conduct.

PREAMBLE

It was the purpose of this conspiracy to engage in a scheme constituting a systematic ongoing course of conduct to knowingly possess stolen property, with intent to benefit themselves or person(s) other than an owner thereof or to impede the recovery by an owner thereof, and when the property consisted of a public benefit card, in New York County and other jurisdictions inside and outside the State of New York.

It was the role of **RONI RUBINOV** to seek and procure New York City Electronic Benefits Transfer (hereinafter “EBT”) cards or benefits from boosters in exchange for cash.

It was the role of **YURIY KHODZHANDIYEV, AKASYA YASAROGLU** and **ZAMIRA SHAGANOVA** to verify whether the booster’s EBT cards or accounts had active balances and to subsequently purchase the EBT benefits from the boosters in exchange for cash.

It was the role of **JAMES BILIS A/K/A “SLIM”, JUSTIN PEPCHINSKI, KATHLEEN RAGUSA** and **JACQUELINE ALESSI** to sell EBT benefits cards with Welfare benefit balances to **RONI RUBINOV, YURIY KHODZHANDIYEV, AKASYA YASAROGLU** and **ZAMIRA SHAGANOVA** in exchange for cash.

These transactions occurred either in the vicinity of 67 and 71 W 47th Street or over the phone, as identified in intercepted communications.

It was also part of this conspiracy for members of the conspiracy to communicate with each other and others over cellular telephones using codes and communicating in a guarded, cryptic manner.

OVERT ACTS:

In the furtherance of the Conspiracy, and to effect the objects thereof, from on or about and between August 30, 2019, and January 7, 2020, the following overt acts, among others, were committed:

1. On September 10, 2019, **RONI RUBINOV** engaged in a phone conversation with Wasserman’s Supermarket, whereby he stated, in sum and

substance, “three-two-nine-zero, right? ... one hundred and nineteen seventy-five... EBT. Food Stamps.”

2. On October 5, 2019, YURIY KHODZHANDIYEV engaged in a phone conversation, whereby he stated, in sum and substance “How much should I give him for the card? He is here.” Shortly thereafter, YURIY KHODZHANDIYEV engaged in another phone conversation, whereby he checked the balance of an EBT card and learned that the pending cash benefit on the card was \$91.50.

3. On November 7, 2019, AKASYA YASAROGLU engaged in a phone conversation whereby she stated, in sum and substance, “Roni, Justin is here... Benefit card... He has benefit card, he say.”

4. On October 5, 2019, ZAMIRA SHAGANOVA gave RONI RUBINOV's employee \$50 cash to pay a booster for an EBT card.

5. On September 10, 2019. JAMES BILIS A/K/A “SLIM” engaged in a phone conversation, whereby he stated, in sum and substance, “Yeah, it's Slim. I'm over here now...I was going to-do you need- because I have my EBT card the food card and it got money on it. Will you take it?”

6. On November 7, 2019, JUSTIN PEPCHINSKI sent a text message, whereby he stated, in sum and substance, “Hey Ronnie, It's Justin, I have a card with \$180 in food stamps. How much do you give for that?”

7. On October 7, 2019, KATHLEEN RAGUSA engaged in a phone conversation, whereby she stated, in sum and substance, “Hi Roni, I'm sorry to both you. It's Kathleen, just need a second of your time. I have my food stamp card again.

Are you interested in it?... \$50.39. I just bought something. The receipt's right here. I put the pin number on the receipt".

8. On November 7, 2019, JACQUELINE ALESSI engaged in a phone conversation, whereby she stated, in sum and substance, "Okay, so look you got an E-card... I'll give you the info... Alright, so listen, the reason why there's extra money on there is because I had pregnancy allowance that they owed me from – they never gave that to me when I told them I was pregnant back in June, they were supposed to put it on and they never did. So, I have like a lot of money on there from that... I'll go online and I'll send you everything... And then I'll have you PayPal".

COUNT 10

The Grand Jury of New York County, by this Indictment, accuses the defendants, **RONI RUBINOV, YURIY KHODZHANDIYEV, AKASYA YASAROGLU, ZAMIRA SHAGANOVA, JAMES BILIS A/K/A "SLIM", JUSTIN PEPCHINSKI, KATHLEEN RAGUSA** and **JACQUELINE ALESSI**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Criminal Possession of Stolen Property in the Fourth Degree, in violation of New York State Penal Law § 165.45(2)**, committed as follows:

The defendants, from on or about **August 30, 2019 to on or about January 7, 2020, in the County of New York**, knowingly possessed stolen property, with intent to benefit themselves or person(s) other than an owner thereof or to impede the recovery by an owner thereof, and when the property consisted of a public benefit card.

COUNT 11

The Grand Jury of New York County, by this Indictment, accuses the defendant, **RONI RUBINOV, YURIY KHODZHANDIYEV, AKASYA YASAROGLU** and **ZAMIRA SHAGANOVA**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Criminal Use of a Public Benefit Card in the First Degree, in violation of New York State Penal Law § 158.35(i)**, committed as follows:

The defendants, from on or about **August 30, 2019 to on or about January 7, 2020, in the County of New York**, pursuant to an act or a series of acts, knowingly obtained three or more public benefit cards from another or others in exchange for a benefit.

COUNT 12

The Grand Jury of New York County, by this Indictment, accuses the defendant, **JACQUELINE ALESSI**, of the crime of **Criminal Use of a Public Benefit Card in the First Degree, in violation of New York State Penal Law § 158.35(ii)**, committed as follows:

The defendant, from on or about **August 30, 2019 to on or about January 7, 2020, in the County of New York**, pursuant to an act or a series of acts, knowingly transferred or delivered three or more public benefit cards to another or others in exchange for money.

COUNT 13

The Grand Jury of New York County, by this Indictment, accuses the defendant, **JAMES BILIS A/K/A “SLIM”**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Criminal Use of a Public Benefit Card in the Second Degree, in violation of New York State Penal Law § 158.30(3)(a)**, committed as follows:

The defendant, from on or about **September 10, 2019 to on or about December 13, 2019, in the County of New York**, knowingly transferred or delivered a public benefit card to another in exchange for money.

COUNT 14

The Grand Jury of New York County, by this Indictment, accuses the defendant, **JUSTIN PEPCHINSKI**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Criminal Use of a Public Benefit Card in the Second Degree, in violation of New York State Penal Law § 158.30(3)(a)**, committed as follows:

The defendant, from on or about **September 10, 2019 to on or about December 13, 2019, in the County of New York**, knowingly transferred or delivered a public benefit card to another in exchange for money.

COUNT 15

The Grand Jury of New York County, by this Indictment, accuses the defendant, **KATHLEEN RAGUSA**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Criminal Use of a Public**

Benefit Card in the Second Degree, in violation of New York State Penal Law § 158.30(3)(a), committed as follows:

The defendant, from on or about **September 10, 2019 to on or about December 13, 2019, in the County of New York**, knowingly transferred or delivered a public benefit card to another in exchange for money.

COUNT 16

The Grand Jury of New York County, by this Indictment, accuses the defendant, **RONI RUBINOV**, of the crime of **Criminal Possession of a Public Benefit Card in the Second Degree, in violation of New York State Penal Law § 158.45**, committed as follows:

The defendant, from on or about **August 30, 2019 to on or about January 7, 2020, in the County of New York**, with intent to defraud, deceive or injure another, knowingly possessed ten or more public benefit cards in a name or names other than the person's own name.

COUNT 17

The Grand Jury of New York County, by this Indictment, accuses the defendants, **RONI RUBINOV** and **JACQUELINE ALESSI**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Welfare Fraud in the Third Degree, in violation of New York State Penal Law § 158.15**, committed as follows:

The defendants, from on or about **August 30, 2019 to on or about January 7, 2020, in the County of New York**, committed a fraudulent welfare act and thereby took or obtained public assistance benefits, and when the value of the public assistance benefits exceeds three thousand (3,000) dollars.

Dated: April ____, 2022
New York, New York

Nicole Keary
Deputy Attorney General
Organized Crime Task Force

By _____
Brandi Kligman
Assistant Deputy Attorney General
Statewide Organized Crime Task Force
44 South Broadway
White Plains, NY 10601

A TRUE BILL

GRAND JURY FOREPERSON
Dated: April ____, 2022