

victims' bank accounts to bank accounts created and controlled by the cash-out actors, referred to as drop accounts.

2. The cash-out actors provided a network of drop accounts and money mules to receive, transfer, and conceal funds derived from the fraudulent electronic funds transfers. Money mules controlled by the cash-out actors accessed the drop accounts in order to withdraw the stolen funds, or transfer the stolen funds into other drop accounts for eventual withdrawal and transfer to other cash-out actors or cyber actors. In exchange for their services, the cash-out actors withheld a fee, up to 50% of the proceeds from the fraudulent electronic funds transfers.

3. "Money mules" acted at the direction of cash-out actors to establish sham companies and drop accounts, and, for a fee, transfer electronically the illegally obtained funds between drop accounts.

4. The cash-out actors, the cyber actors, and the money mules, jointly referred to as conspirators, conspired with one another to transmit and transfer funds stolen from U.S. victim bank accounts to foreign drop accounts.

5. KFT was an abbreviation in Hungarian that translated to the English equivalent of Limited Liability Corporation (LLC).

Individuals and Entities

6. **Viktor Vorontsov** was a citizen of Ukraine. During the period of the conspiracy, **Vorontsov** primarily resided in Prague, Czech Republic and used the online monikers Alex and AlexCoin.

7. **Zlata Muzhuk** was a citizen of Ukraine. During the period of the conspiracy, **Muzhuk** primarily resided in Cherkassy, Ukraine and used the online monikers Julia Muzhuk, Zlata Hanska, Zayci, Desislava Nikolova, Desire, and Dezire.

8. **Vorontsov and Muzhuk** were providers of cash-out services for cyber actors. As such, **Vorontsov and Muzhuk** provided cyber actors with access to drop accounts controlled by themselves and their coconspirators to receive stolen funds from victims' online bank accounts.

9. An unnamed coconspirator (CC), known to the Grand Jury, was citizen of Russia. During the period of the conspiracy, CC primarily resided in Hungary.

10. Victim Company A was located in Dallas, Texas. Victim Company A maintained a company bank account at Chase Bank, located in the Northern District of Texas. Victim Company A had a business line account within American Express Foreign Exchange Services (FES), known as International Payments (FX IP), which allowed Victim Company A to conduct wire payment services from its Chase Bank account to recipients.

11. Victim Company B was located in Fullerton, California. Victim Company B maintained a company bank account at Commercial Bank of California.

12. Victim Individual #1 resided in California and maintained a bank account at Charles Schwab and Co., Inc.

13. Victim Individual #2 resided in Houston, Texas and maintained a bank account at Bank of America, NA.

14. Victim Individual #3 resided in Florida and maintained a bank account at Bank of America.

15. Victim Individual #4 resided in California and maintained a bank account at Bank of America, NA.

16. JPMorgan Chase Bank, N.A., dba Chase Bank, and Bank of America, NA were financial institutions as defined in 18 U.S.C. § 20, whose depositors' accounts were insured by the Federal Deposit Insurance Corporation (FDIC).

17. Charles Schwab and Co., Inc. was a deposit broker that often would place its customers' deposits at accounts at financial institutions as defined in 18 U.S.C. § 20.

18. MagNet Bank, also known as MagNet Magyar Közösségi Bank Zrt, was a Community bank in Hungary. CC maintained a MagNet Bank account in the name of Baltic Gold Lady KFT, bearing account number¹ xxx8768. Baltic Gold Lady KFT was a Hungarian company created by CC and another individual.

19. Oberbank AG was a regional bank located in Europe and headquartered in Linz, Austria. CC maintained an Oberbank AG account in CC's name, bearing account number xxx7770. CC opened this account on March 2, 2016 and was its sole signatory.

20. mBank, formally known as BRE Bank (Bank Rozwoju Eksportu), was a universal banking group established in Poland with retail operations in the Czech Republic and Slovakia. **Muzhuk** maintained two mBank accounts in the name Desislava Nikolova, bearing account numbers xxx6210 and xxx8836.

¹ Regardless of the number of digits, all bank account numbers except those quoted in the Viber chats will be reflected as xxx and the last four digits.

COUNT ONE

Conspiracy to Commit Money Laundering
(18 U.S.C. § 1956(h) and 18 U.S.C. § 1956(a)(2)(A))

21. The Grand Jury re-alleges and incorporates the Introduction to this indictment.
22. From in or about at least January 2017, and continuing through in or about December 2017, defendants **Viktor Vorontsov** and **Zlata Muzbuk** did knowingly and willfully combine, conspire, confederate, and agree with each other and with other persons known and unknown to the Grand Jury, to transmit and transfer and attempt to transmit and transfer funds from a place in the United States to a place outside the United States, with the intent to promote the carrying on of specified unlawful activity, that is, wire fraud in violation of 18 U.S.C. § 1343, and bank fraud in violation of 18 U.S.C. § 1344(2).

Manner and Means

23. It was the manner and means of the conspiracy that the cash-out actors would do the following:
- (a) Open and cause to be opened domestic and foreign drop accounts controlled by the cash-out actors or money mules to receive the stolen funds in the form of electronic funds transfers from victims' online bank accounts.
 - (b) Recruit individuals to be money mules and cash-out actors.
 - (c) Cause money mules to create sham companies, open drop accounts, and receive and transfer stolen funds.

- (d) Advertise cash-out services to cyber actors in online forums and through other methods.
- (e) Communicate with other cash-out actors on various messaging applications.
- (f) Transmit and transfer stolen funds through electronic funds transfers and other means from accounts within the United States to accounts outside the United States.
- (g) Provide details to other conspirators regarding the electronic funds transfers, such as country, amount, account identifiers, currency and date, for receiving the stolen funds as well as the percentage the cash-out actors would collect for providing cash-out services.
- (h) Maintain communications about the status of the transfer of the stolen funds with the other cash-out actors, specifically if the transfer had been initiated and if the stolen funds had been cashed-out or transferred to other drop accounts.
- (i) Collect their percentage of the stolen funds, and launder the remaining stolen funds back to other conspirators, specifically the cyber actors.

Overt Acts

24. In furtherance of the conspiracy and joint scheme and artifice and in order to effect the objects thereof, defendants **Viktor Vorontsov** and **Zlata Muzhuk** and other unnamed conspirators, known and unknown to the Grand Jury, on or about the dates listed below, initiated the following electronic funds transfers without the authorization or knowledge of the account owners, as identified in the table below:

Date	Victim Account Holder, Financial Institution, and Account Number	Electronic Funds Transfers (Estimated in USD)	Account Holder, Drop Account, and Account Number
10/11/17	Victim Company B Commercial Bank of CA #xxx8899	\$149,000	Baltic Gold Lady KFT Magnet Bank ZRT HU33 xxx8768
10/16/17	Victim Company A AmEx Foreign Exch. Sv #xxx2843	\$148,620	Baltic Gold Lady KFT Magnet Bank ZRT HU33 xxx8768
10/20/17	Victim Individual #1 Charles Schwab and Co. #xxx5202	\$50,000 \$19,000	[CC] Oberbank AG HU98 xxx7770
10/20/17	Victim Individual #2 Bank of America #xxx7853	\$22,000	[CC] Oberbank AG HU98 xxx7770
10/26/17	Victim Individual #3 Bank of America #xxx8904	\$33,200	Desislava Nikolova mBank xxx6210
11/13/17	Victim Individual #4 Bank of America #xxx4172	\$77,000	Desislava Nikolova mBank xxx8836

In violation of 18 U.S.C. § 1956(h) (18 U.S.C. § 1956(a)(2)(A)).

NOTICE OF FORFEITURE

Pursuant to 18 U.S.C. § 982(a)(1), upon conviction for the offense set out in Count One, defendants **Viktor Vorontsov** and **Zlata Muzhuk** shall forfeit to the United States any property, real or personal, involved in the offense, or any property traceable to such property.

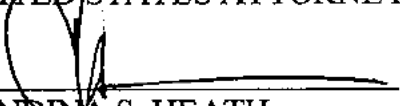
Pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b), if any of the property described above, as a result of any act or omission of a particular defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- 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 divided without difficulty,

the United States intends to seek forfeiture of any other property of that defendant up to the value of the forfeitable property described above.


FOREPERSON 

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

THE UNITED STATES OF AMERICA

v.

VIKTOR VORONTSOV (1)

aka Alex, AlexCoin

ZLATA MUZHUK (2)

aka Julia Muzhuk, Zlata Hanska,

Zayci, Desislava Nikolova,

Desire, Dezire

INDICTMENT

18 U.S.C. § 1956(h) and 18 U.S.C. § 1956(a)(2)(A)

Conspiracy to Commit Money Laundering
(Count 1)

18 U.S.C. § 982(a)(1)

Forfeiture Notice

1 Count

A true bill rendered

DALLAS


FOREPERSON

Filed in open court this 4th day of February, 2020.

Warrants to be Issued


UNITED STATES MAGISTRATE JUDGE

Magistrate Court Number: 3:20-MJ-00090-BK