

★ FEB 02 2018 ★

BROOKLYN OFFICE

MKM:GKS
F. #2016R01074

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA

- against -

INNA CHEBANENKO,
ANDRII GERASYMENKO and
GEORGY ZAKALYUGIN,
also known as "George Zakalyugin,"

Defendants.

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THE GRAND JURY CHARGES:

INTRODUCTION

At all times relevant to this Indictment, unless otherwise indicated:

1. The defendants INNA CHEBANENKO, ANDRII GERASYMENKO and GEORGY ZAKALYUGIN, also known as "George Zakalyugin," operated motor vehicle dealerships that were incorporated in the State of Indiana and did business in the State of Illinois.

2. A rebuilt vehicle was a vehicle that was previously branded "salvage" but was rebuilt to road-worthiness. In Indiana, a rebuilt vehicle was required to pass an inspection by an Indiana law enforcement officer and meet other state-mandated standards in

INDICTMENT
CR 18 - 51

Cr. No. _____
(T. 18, U.S.C., §§ 981(a)(1)(C), 1349 and
3551 et seq.; T. 21, U.S.C., § 853(p); T. 28,
U.S.C., § 2461(c))

VITALIANO, J.

POLLAK, M.J.

order to return to the road. A motor vehicle title for a rebuilt vehicle included the “rebuilt vehicle” brand.

3. The defendants INNA CHEBANENKO, ANDRII GERASYMENKO and GEORGY ZAKALYUGIN, also known as “George Zakalyugin,” together with others, obtained fraudulent State of Indiana motor vehicle titles for rebuilt vehicles and provided the titles to other co-conspirators.

4. One or more co-conspirators in Brooklyn, New York and elsewhere then solicited customers to purchase rebuilt vehicles by advertising used vehicles for sale on Craigslist.org and failed to disclose that the vehicles for sale were actually rebuilt vehicles. As part of the scheme, upon completion of the sales, one or more co-conspirators provided the customers with the fraudulent State of Indiana titles that did not disclose that the vehicles associated with those titles were rebuilt vehicles.

CONSPIRACY TO COMMIT WIRE FRAUD

5. The allegations contained in paragraphs one through four are realleged and incorporated as if fully set forth in this paragraph.

6. In or about and between 2013 and 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants INNA CHEBANENKO, ANDRII GERASYMENKO and GEORGY ZAKALYUGIN, also known as “George Zakalyugin,” together with others, did knowingly and intentionally conspire to devise a scheme and artifice to defraud the customers, and to obtain money from them by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice, to transmit and cause to be transmitted by

means of wire communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, contrary to Title 18, United States Code, Section 1343.

(Title 18, United States Code, Sections 1349 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

7. The United States hereby gives notice to the defendants that, upon their conviction of the offense charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense.

8. If any of the above-described forfeitable property, 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 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;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to

seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.


(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL



FOREPERSON

RICHARD P. DONOGHUE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK


BY:
ACTING UNITED STATES ATTORNEY
PURSUANT TO 28 C.F.R. O.136

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

INNA CHEBANENKO, ANDRII GERASYMENKO AND GEORGY
ZAKALYUGIN, ALSO KNOWN AS "GEORGE ZAKALYUGIN,"

Defendants.

INDICTMENT

(T. 18, U.S.C., §§ 981(a)(1)(C), 1349 and 3551 *et seq.*; T. 21, U.S.C., §
853(p); T. 28, U.S.C., § 2461(c))

A true bill.

2/1/18

Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

G. Karthik Srinivasan, Assistant U.S. Attorney (718) 254-6013