

EXHIBIT 2

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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
June 2004 Grand Jury

UNITED STATES OF AMERICA,)	CR No. 02-220(B)-NM
)	
Plaintiff,)	<u>S E C O N D</u>
)	<u>S U P E R S E D I N G</u>
v.)	<u>I N D I C T M E N T</u>
)	
IOURI MIKHEL,)	[18 U.S.C. § 1203: Conspiracy
JURIJUS KADAMOVAS,)	to Take Hostages Resulting in
PETRO KRYLOV,)	Death; 18 U.S.C. § 1203:
NATALYA SOLOVYEVA, and)	Hostage-Taking Resulting in
ALEKSEJUS MARKOVSKIS,)	Death; 18 U.S.C. § 1956(h):
)	Conspiracy to Launder Monetary
Defendants.)	Instruments; 18 U.S.C. § 371:
)	Conspiracy to Escape from
)	Custody; 18 U.S.C.
)	§ 981(a)(1)(C), 21 U.S.C.
)	§ 853, and 28 U.S.C. § 2461(c):
)	Criminal Forfeiture]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 1203]

A. OBJECT OF THE CONSPIRACY

Beginning on a date unknown and continuing until on or about February 19, 2002, in Los Angeles County, within the Central District of California, and elsewhere, defendants IOURI MIKHEL,

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1 JURIJUS KADAMOVAS, PETRO KRYLOV, NATALYA SOLOVYEVA, and ALEKSEJUS
2 MARKOVSKIS, and co-conspirator Ainar Altmanis, who were and are
3 not nationals of the United States, and others known and unknown
4 to the Grand Jury, conspired and agreed with each other to
5 knowingly seize and detain other persons (including Meyer
6 Muscatel, Rita Pekler, Alexander Umanksy, Nick Kharabadze, and
7 George Safiev (hereinafter "victims")), and threaten to kill,
8 injure, and continue to detain the victims, in order to compel
9 third persons to do an act, specifically pay money, as an
10 explicit and implicit condition for the release of the victims,
11 with the death of the victims resulting, all in violation of
12 Title 18, United States Code, Section 1203.

13 B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY
14 WAS TO BE ACCOMPLISHED

15 The object of the conspiracy was to be accomplished, in
16 substance, as follows:

17 1. Defendants IOURI MIKHEL, JURIJUS KADAMOVAS, and PETRO
18 KRYLOV would identify persons whom they believed were wealthy and
19 whom could be seized and detained for the purpose of demanding
20 ransom money.

21 2. Defendants IOURI MIKHEL and JURIJUS KADAMOVAS would
22 develop plans to lure the victims to locations where they could
23 be abducted.

24 3. Defendants PETRO KRYLOV, ALEKSEJUS MARKOVSKIS, and
25 NATALYA SOLOVYEVA, and co-conspirator Ainar Altmanis would assist
26 defendants IOURI MIKHEL and JURIJUS KADAMOVAS in their plans to
27 abduct victims.

28 4. Defendants IOURI MIKHEL, JURIJUS KADAMOVAS, and NATALYA
SOLOVYEVA would pose as people known to the victims or interested

1 in doing business with the victims to entice the victims to go to
2 locations where they could be abducted.

3 5. Defendants IOURI MIKHEL, JURIJUS KADAMOVAS, PETRO
4 KRYLOV, and ALEKSEJUS MARKOVSKIS, and co-conspirator Ainar
5 Altmanis would seize the victims.

6 6. Defendants IOURI MIKHEL, JURIJUS KADAMOVAS, PETRO
7 KRYLOV, and ALEKSEJUS MARKOVSKIS, and co-conspirator Ainar
8 Altmanis would detain the victims at a house belonging to JURIJUS
9 KADAMOVAS at 3534 Weslin Avenue, Sherman Oaks, California
10 (henceforth the "Weslin House").

11 7. Defendants IOURI MIKHEL and JURIJUS KADAMOVAS, and co-
12 conspirators unknown to the Grand Jury, would demand payment of
13 ransom money from the victims, the victims' family members,
14 and/or the victims' business associates.

15 8. Defendants IOURI MIKHEL and JURIJUS KADAMOVAS and
16 unknown co-conspirators would continue to detain and threaten to
17 harm the victims until the ransom money was paid.

18 9. Defendants IOURI MIKHEL, JURIJUS KADAMOVAS, PETRO
19 KRYLOV, and ALEKSEJUS MARKOVSKIS, and co-conspirator Ainar
20 Altmanis would guard the victims to prevent them from escaping.

21 10. Defendants IOURI MIKHEL and JURIJUS KADAMOVAS would
22 lure the victims into a false sense of security by telling them
23 that they would be released when the ransom money was paid.

24 11. Defendants IOURI MIKHEL, JURIJUS KADAMOVAS, and PETRO
25 KRYLOV, and co-conspirator Ainar Altmanis would kill the victims
26 by suffocating them, sometimes after all or part of the ransom
27 money was paid.

28 12. Defendants IOURI MIKHEL, JURIJUS KADAMOVAS, and PETRO

1 KRYLOV, and co-conspirator Ainar Altmanis would tie weights on
2 the victims' bodies and throw the bodies into the New Melones
3 Reservoir near Yosemite National Park.

4 13. Defendant ALEKSEJUS MARKOVSKIS would clean the areas of
5 the Weslin House where the victims had been held, as well as the
6 vehicles used to transport the victims to the New Melones
7 Reservoir.

8 14. To disguise the source of the ransom money before
9 transferring it to their bank accounts, defendants IOURI MIKHEL
10 and JURIJUS KADAMOVAS would arrange for the paid ransom money to
11 be sent to bank accounts around the world in the names of
12 different persons and entities.

13 15. Defendants IOURI MIKHEL, JURIJUS KADAMOVAS, PETRO
14 KRYLOV, and ALEKSEJUS MARKOVSKIS, and co-conspirator Ainar
15 Altmanis would share the proceeds of the ransom money.

16 C. OVERT ACTS

17 In furtherance of the conspiracy and to accomplish the
18 object of the conspiracy, defendants IOURI MIKHEL, JURIJUS
19 KADAMOVAS, PETRO KRYLOV, ALEKSEJUS MARKOVSKIS, and NATALYA
20 SOLOVYEVA, and co-conspirator Ainar Altmanis and other co-
21 conspirators known and unknown to the Grand Jury, on or about the
22 following dates committed the following overt acts, among others,
23 within the Central District of California and elsewhere:

24 Meyer Muscatel

25 1. In October 2001, defendants IOURI MIKHEL and JURIJUS
26 KADAMOVAS recruited co-conspirator Ainar Altmanis to be a member
27 of their conspiracy to take victims hostage by convincing him to
28 participate in a plan to abduct Meyer Muscatel.

1 2. In October 2001, defendants IOURI MIKHEL and JURIJUS
2 KADAMOVAS told Altmanis that they intended to abduct Muscatel in
3 order to collect a debt owed to one of their associates stemming
4 from a business dispute.

5 3. On October 10, 2001, defendant IOURI MIKHEL,
6 posing as a wealthy Russian who wanted to discuss a real estate
7 purchase, scheduled an appointment to meet with Muscatel at
8 Muscatel's office.

9 4. On October 11, 2001, defendant IOURI MIKHEL purchased
10 items from a Home Depot to be utilized in the abduction and
11 murder of Muscatel, including plastic ties, duct tape, and a box
12 of plastic boot covers.

13 5. On October 11, 2001, defendant JURIJUS KADAMOVAS and
14 co-conspirator Ainar Altmanis positioned themselves near
15 Muscatel's office for the purpose of reporting Muscatel's arrival
16 at his office to defendant IOURI MIKHEL.

17 6. On October 11, 2001, defendant IOURI MIKHEL lured
18 Muscatel to his residence, located at 17055 Oak View Drive,
19 Encino, California (the "Oak View House"), under the guise that
20 MIKHEL wanted to discuss a potential real estate purchase with
21 Muscatel.

22 7. On October 11, 2001, defendants IOURI MIKHEL, JURIJUS
23 KADAMOVAS, and co-conspirator Ainar Altmanis seized Muscatel when
24 he entered the Oak View House.

25 8. On October 11, 2001, defendants IOURI MIKHEL and
26 JURIJUS KADAMOVAS bound Muscatel's legs with plastic ties and
27 handcuffed his hands behind his back.

28 9. On October 11, 2001, defendants IOURI MIKHEL and

1 JURIJUS KADAMOVAS moved Muscatel's car to the parking lot of a
2 Gelson's Market while co-conspirator Ainar Altmanis guarded
3 Muscatel to prevent his escape from the Oak View House.

4 10. On October 12, 2001, defendants IOURI MIKHEL and
5 JURIJUS KADAMOVAS, using a pre-paid cellular telephone subscribed
6 to a fictitious name, forced Muscatel to contact a representative
7 of People's Bank to inquire about wire transferring money from a
8 bank account belonging to a business that Muscatel owned.

9 11. On October 12, 2001, defendants IOURI MIKHEL and
10 JURIJUS KADAMOVAS, using a pre-paid cellular telephone subscribed
11 to a fictitious name, forced Muscatel to contact his business
12 partner, Shy Cohen, to request that Cohen consolidate all of
13 their business' funds into a single bank account.

14 12. On October 13, 2001, defendants IOURI MIKHEL and
15 JURIJUS KADAMOVAS killed Muscatel at the Oak View House by
16 suffocating him.

17 13. On October 13, 2001, defendants IOURI MIKHEL and
18 JURIJUS KADAMOVAS loaded Muscatel's body into KADAMOVAS' van and
19 left to search for a location to dispose of Muscatel's body.

20 14. On October 13, 2001, defendants IOURI MIKHEL and
21 JURIJUS KADAMOVAS transported Muscatel's body to the Parrot's
22 Ferry Road Bridge, which spans the New Melones Reservoir, and
23 determined that the New Melones Reservoir was a location where
24 they could dispose of their victims' bodies.

25 15. On October 13, 2001, defendants IOURI MIKHEL and
26 JURIJUS KADAMOVAS attached weights to Muscatel's body and threw
27 it from the Parrot's Ferry Road Bridge into the New Melones
28 Reservoir.

1 16. On October 13, 2001, co-conspirator Ainar Altmanis,
2 acting at the direction of defendants IOURI MIKHEL and JURIJUS
3 KADAMOVAS, cleaned the rooms of the Oak View House where victim
4 Meyer Muscatel had been held.

5 Alexander Umansky

6 17. In December 2001, defendant PETRO KRYLOV told
7 defendant IOURI MIKHEL that his former employer, Alexander
8 Umansky, who owned a car electronics shop known as "Hard Wired
9 Auto Accessories," located at 12547 Sherman Way, Suite E, in Los
10 Angeles, California ("Hard Wired business" or "Umansky's
11 business"), would be a good target for abduction.

12 18. In December 2001, defendant PETRO KRYLOV told
13 defendant IOURI MIKHEL that Umansky made \$30,000 to \$50,000 per
14 month.

15 19. In December 2001, defendants IOURI MIKHEL and JURIJUS
16 KADAMOVAS developed a plan to abduct Umansky.

17 20. In early December, prior to December 13, 2001,
18 defendant PETRO KRYLOV, in furtherance of the plan to abduct
19 Umansky, visited Umansky's business to access its computer system
20 to determine the amount of the business' accounts receivable.

21 21. In early December, prior to December 13, 2001,
22 defendant PETRO KRYLOV learned that the current amount of the
23 accounts receivable for the Hard Wired business was approximately
24 \$234,000.

25 22. On December 12, 2001, defendant IOURI MIKHEL, posing
26 as a potential client named "Victor," called the Hard Wired
27 business, using a pre-paid cellular telephone subscribed to a
28 fictitious name, to make an appointment with Umansky under the

1 guise of having Umansky install electronics on a car he planned
2 to buy.

3 23. On December 13, 2001, defendant IOURI MIKHEL, posing
4 as "Victor," met with Umansky and brought him to the Weslin
5 House.

6 24. On December 13, 2001, defendant JURIJUS KADAMOVAS and
7 co-conspirator Ainar Altmanis pointed loaded handguns at Umansky
8 when he walked into the Weslin House.

9 25. On December 13, 2001, defendants IOURI MIKHEL and
10 JURIJUS KADAMOVAS tied Umansky to a chair.

11 26. On December 14, 2001, defendants IOURI MIKHEL and
12 JURIJUS KADAMOVAS forced Umansky to call Umansky's brother
13 several times to tell Umansky's brother that he should not call
14 the police or the FBI, and that Umansky's brother would receive a
15 facsimile at his home with instructions where to send ransom
16 money.

17 27. On December 14, 2001, defendants IOURI MIKHEL and
18 JURIJUS KADAMOVAS caused three copies of a facsimile, which
19 appeared to be a note payable, to be sent from Russia to
20 Umansky's Hard Wired business stating that \$234,628 should be
21 sent to Standard Chartered Bank in New York, for further credit
22 to an account, which belonged to Andrei Agueev, in the name of Al
23 Shaza Sanitary and Building Materials TRD ("Al Shaza account"),
24 at the bank's branch in Dubai, United Arab Emirates.

25 28. On December 14, 2001, defendants IOURI MIKHEL and
26 JURIJUS KADAMOVAS caused Umansky's brother to receive a facsimile
27 regarding the payment of ransom money that was identical to the
28 facsimile sent to the Hard Wired business.

1 29. On December 17, 2001, defendants IOURI MIKHEL and
2 JURIJUS KADAMOVAS forced Umansky to call his brother to determine
3 whether the ransom money had been paid.

4 30. On December 17, 2001, defendant IOURI MIKHEL decided to
5 kill Umansky after learning that ransom money had been paid.

6 31. On December 17, 2001, defendants IOURI MIKHEL and
7 JURIJUS KADAMOVAS, and co-conspirator Ainar Altmanis killed
8 Umansky at the Weslin House by suffocating him.

9 32. On December 17 and 18, 2001, defendants IOURI MIKHEL
10 and JURIJUS KADAMOVAS, and co-conspirator Ainar Altmanis
11 transported Umansky's body to the Parrot's Ferry Road Bridge,
12 which spans the New Melones Reservoir, and threw the body, with
13 weights attached, into the water.

14 33. Between December 18, 2001, and December 27, 2001,
15 defendant IOURI MIKHEL arranged for an unknown co-conspirator in
16 Russia to contact Umansky's family to demand more ransom money.

17 Rita Pekler

18 34. In November 2001, defendants IOURI MIKHEL and JURIJUS
19 KADAMOVAS developed a plan to abduct an accountant named Rita
20 Pekler.

21 35. In November 2001, defendants IOURI MIKHEL and JURIJUS
22 KADAMOVAS discussed abducting Pekler in order to lure one of her
23 wealthy clients, George Safiev, to come to defendant KADAMOVAS'
24 Weslin House so that Safiev could be abducted and held for
25 ransom.

26 36. On December 3, 2001, defendant JURIJUS KADAMOVAS, using
27 the name "Volodia," went to Pekler's office, located at 971 North
28 La Cienega Boulevard, Los Angeles, California, and scheduled a

1 meeting with Pekler for the afternoon of December 4, 2001.

2 37. On the morning of December 4, 2001, defendant JURIJUS
3 KADAMOVAS, posing as "Volodia" and using a pre-paid cellular
4 telephone subscribed to a fictitious name, called Pekler's
5 office, cancelled his appointment, and left a message for Pekler
6 to call him.

7 38. On December 5, 2001, defendant JURIJUS KADAMOVAS,
8 posing as "Volodia," made an appointment to meet with Pekler
9 under the guise that he wanted to buy property.

10 39. On December 5, 2001, defendant JURIJUS KADAMOVAS met
11 Pekler and took her to his Weslin House.

12 40. On December 5, 2001, defendants IOURI MIKHEL and PETRO
13 KRYLOV and co-conspirator Ainar Altmanis surrounded Pekler when
14 she walked into the Weslin House.

15 41. On December 5, 2001, defendant IOURI MIKHEL told Pekler
16 to telephone George Safiev and arrange a meeting with him.

17 42. On December 5, 2001, defendant IOURI MIKHEL assured
18 Pekler that she would not be harmed if she contacted George
19 Safiev.

20 43. On December 5, 2001, defendant IOURI MIKHEL caused
21 Pekler to telephone George Safiev to try to arrange a meeting,
22 but Safiev told Pekler that he was leaving for Moscow that
23 evening and could not meet her.

24 44. Beginning on a date unknown, and continuing to February
25 19, 2002, defendant IOURI MIKHEL kept rope and boxes of Dimedrol
26 ampules for injection at the Oak View Residence.

27 45. On December 5, 2001, after Pekler was unable to arrange
28 the desired meeting with Safiev, defendants IOURI MIKHEL and

1 JURIJUS KADAMOVAS told Pekler they were going to give her a shot
2 of Dimedrol to put her to sleep.

3 46. On December 5, 2001, defendants IOURI MIKHEL and
4 JURIJUS KADAMOVAS told Pekler that she would be left somewhere to
5 wake up and find her way home, so that defendants IOURI MIKHEL,
6 JURIJUS KADAMOVAS, and PETRO KRYLOV, and co-conspirator Ainar
7 Altmanis would have enough time to leave the country.

8 47. On December 5, 2001, defendants IOURI MIKHEL and
9 JURIJUS KADAMOVAS killed Pekler by suffocating her.

10 48. On December 5, 2001, defendants IOURI MIKHEL and
11 JURIJUS KADAMOVAS transported Pekler's body to the Parrot's Ferry
12 Road Bridge, which spans the New Melones Reservoir, and threw the
13 body, with weights attached, into the water.

14 Nick Kharabadze and George Safiev

15 49. Beginning sometime in the summer of 2001, defendant
16 JURIJUS KADAMOVAS' girlfriend, defendant NATALYA SOLOVYEVA,
17 gathered information about George Safiev, including that Safiev
18 had an assistant named Nick Kharabadze, who served as Safiev's
19 driver and translator.

20 50. Between July 2001 and January 2002, defendant NATALYA
21 SOLOVYEVA provided information she learned about Safiev to
22 defendant JURIJUS KADAMOVAS.

23 51. Beginning on a date unknown, and continuing to February
24 19, 2002, defendant IOURI MIKHEL kept at his Oak View Residence
25 personal information about Kharabadze and Safiev, their places of
26 business, and their business associates.

27 52. In approximately December 2001 and January 2002,
28 defendants IOURI MIKHEL and JURIJUS KADAMOVAS developed a plan to

1 use Kharabadze to lure Safiev to a place where Safiev could be
2 abducted.

3 53. Beginning on a date unknown, and continuing to February
4 19, 2002, defendant PETRO KRYLOV kept at his residence, located
5 at 1441 North Vista Street, Apartment 18, Los Angeles,
6 California, a map with an "X" identifying the area where
7 Kharabadze lived, as well as a list of the types of cars driven
8 by Kharabadze's family.

9 54. In January 2002, defendants IOURI MIKHEL and JURIJUS
10 KADAMOVAS asked defendant NATALYA SOLOVYEVA to pose as a woman
11 who Kharabadze had met previously in Moscow and telephone
12 Kharabadze to arrange to meet him.

13 55. On January 18, 2002, defendant NATALYA SOLOVYEVA, using
14 a pre-paid cellular telephone subscribed to a fictitious name,
15 telephoned Kharabadze's cellular telephone and left a message for
16 Kharabadze to call "Natalya from Moscow."

17 56. On January 20, 2002, defendant NATALYA SOLOVYEVA met
18 Kharabadze at Designed Water World, which defendant NATALYA
19 SOLOVYEVA told Kharabadze was a private social club, but which,
20 in fact, was an aquarium business owned by defendants IOURI
21 MIKHEL and JURIJUS KADAMOVAS in Sherman Oaks, California.

22 57. On January 20, 2002, defendant NATALYA SOLOVYEVA
23 brought Kharabadze into Designed Water World.

24 58. On January 20, 2002, defendants IOURI MIKHEL, JURIJUS
25 KADAMOVAS, PETRO KRYLOV, and ALEKSEJUS MARKOVSKIS, and co-
26 conspirator Ainar Altmanis seized Kharabadze and detained him by
27 handcuffing his leg to a chair.

28 59. On January 20, 2002, defendants IOURI MIKHEL and

1 JURIJUS KADAMOVAS forced Kharabadze to telephone Safiev and ask
2 him to come to Designed Water World.

3 60. On January 20, 2002, defendant PETRO KRYLOV waited
4 outside Designed Water World and reported to the others that
5 Safiev arrived alone.

6 61. On January 20, 2002, when Safiev walked into Designed
7 Water World, defendants IOURI MIKHEL, JURIJUS KADAMOVAS, PETRO
8 KRYLOV, and ALEKSEJUS MARKOVSKIS, and co-conspirator Ainar
9 Altmanis seized Safiev and handcuffed him to a chair.

10 62. On January 20, 2002, defendants JURIJUS KADAMOVAS and
11 ALEKSEJUS MARKOVSKIS, and co-conspirator Ainar Altmanis took
12 Kharabadze to the Weslin House.

13 63. On January 20, 2002, defendant JURIJUS KADAMOVAS
14 returned to Designed Water World and picked up Safiev and
15 defendants IOURI MIKHEL and PETRO KRYLOV and returned with them
16 to the Weslin House.

17 64. Beginning on January 20, 2002, defendant ALEKSEJUS
18 MARKOVSKIS and co-conspirator Ainar Altmanis guarded Kharabadze
19 and Safiev at the Weslin House to prevent their escape.

20 65. On January 21 or 22, 2002, defendants IOURI MIKHEL and
21 JURIJUS KADAMOVAS forced Safiev to telephone his business
22 associate in London to ask him to transfer \$969,000 from his
23 business account in Singapore to an account in Miami.

24 66. On January 22, 2002, defendant IOURI MIKHEL, posing as
25 "Raul," called Safiev's business associate to tell him that
26 Safiev was in Mexico, but if money was paid Safiev would be
27 released unharmed.

28 67. On January 24, 2002, in Studio City, California,

1 defendant PETRO KRYLOV purchased a 45-pound "Olympic" brand
2 weight to be used to weigh down the body of Kharabadze after
3 Kharabadze was killed.

4 68. On January 24, 2002, defendants IOURI MIKHEL and
5 JURIJUS KADAMOVAS put Safiev in defendant JURIJUS KADAMOVAS' van
6 and drove north toward the New Melones Reservoir.

7 69. On January 24, 2002, defendant PETRO KRYLOV and co-
8 conspirator Ainar Altmanis put Kharabadze in co-conspirator Ainar
9 Altmanis' Lincoln Navigator and drove north, following defendant
10 JURIJUS KADAMOVAS' van to the New Melones Reservoir.

11 70. On January 25, 2002, when they reached the New Melones
12 Reservoir, defendants IOURI MIKHEL, JURIJUS KADAMOVAS, and PETRO
13 KRYLOV took Safiev to a separate area and killed him.

14 71. On January 25, 2002, defendants IOURI MIKHEL, JURIJUS
15 KADAMOVAS, and PETRO KRYLOV transported Safiev's body to the
16 Stevenot Bridge, which spans the New Melones Reservoir, and threw
17 the body, with weights attached, into the water.

18 72. On January 25, 2002, co-conspirator Ainar Altmanis
19 guarded Kharabadze while defendants IOURI MIKHEL, JURIJUS
20 KADAMOVAS, and PETRO KRYLOV killed Safiev and disposed of his
21 body.

22 73. On January 25, 2002, when defendants IOURI MIKHEL,
23 JURIJUS KADAMOVAS, and PETRO KRYLOV returned from killing Safiev
24 and disposing of his body, they transferred Kharabadze into the
25 van.

26 74. On January 25, 2002, defendants IOURI MIKHEL, JURIJUS
27 KADAMOVAS, and PETRO KRYLOV, and co-conspirator Ainar Altmanis
28 took Kharabadze to a secluded area in Tuolumne County,

1 California.

2 75. On January 25, 2002, defendants IOURI MIKHEL, JURIJUS
3 KADAMOVAS, and PETRO KRYLOV, and co-conspirator Ainar Altmanis
4 restrained Kharabadze while they suffocated him.

5 76. On January 25, 2002, defendants IOURI MIKHEL, JURIJUS
6 KADAMOVAS, and PETRO KRYLOV, and co-conspirator Ainar Altmanis
7 transported Kharabadze's body to the Stevenot Bridge, which spans
8 the New Melones Reservoir, and threw the body, with weights
9 attached, into the water.

10 77. On January 25, 2002, after defendants IOURI MIKHEL,
11 JURIJUS KADAMOVAS, and PETRO KRYLOV, and co-conspirator Ainar
12 Altmanis returned from the New Melones Reservoir, defendant
13 ALEKSEJUS MARKOVSKIS cleaned defendant JURIJUS KADAMOVAS' van,
14 co-conspirator Ainar Altmanis' Lincoln Navigator, and the rooms
15 of the Weslin House where victims Kharabadze and Safiev had been
16 held.

17 78. On January 31, 2002, defendant IOURI MIKHEL and/or
18 defendant JURIJUS KADAMOVAS, posing as "Raul," telephoned
19 Safiev's business associate in London, telling the business
20 associate to read a letter that would be sent to the business
21 associate by facsimile, which letter demanded payment of
22 approximately \$4,000,000 in ransom money.

23 79. On February 12 or 13, 2002, defendant IOURI MIKHEL
24 directed an unknown co-conspirator to send electronic mail
25 messages to Safiev's business associate informing Safiev's
26 business associate that Safiev and Kharabadze were alive, and
27 directing the payment of the ransom money within three days.

28 80. On February 14, 2002, defendants IOURI MIKHEL and

1 JURIJUS KADAMOVAS spoke over the telephone regarding how to
2 ensure that Safiev's business associate paid the outstanding
3 ransom money.

4 81. On February 15, 2002, defendant IOURI MIKHEL directed
5 an unknown co-conspirator to re-send electronic mail messages to
6 Safiev's business associate about the payment of the outstanding
7 ransom money.

8 82. On February 15, 2002, defendant IOURI MIKHEL, posing as
9 "Raul," called Safiev's business associate to determine whether
10 he had received the electronic mail messages sent to him
11 regarding the payment of the ransom money, and to tell the
12 business associate that Safiev remained well, but that Kharabadze
13 was depressed and on drugs.

14 83. On a date between January 20, 2002 and February 19,
15 2002, defendant IOURI MIKHEL prepared a list detailing the
16 allocation of ransom money to be distributed to himself, and to
17 defendants JURIJUS KADAMOVAS, PETRO KRYLOV, and ALEKSEJUS
18 MARKOVSKIS, and co-conspirator Ainar Altmanis.

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COUNT TWO

[18 U.S.C. § 1203]

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3 On or about December 13, 2001, in Los Angeles County, within
4 the Central District of California, defendants IOURI MIKHEL,
5 JURIJUS KADAMOVAS, and PETRO KRYLOV, who were and are not
6 nationals of the United States, seized and detained Alexander
7 Umansky and threatened to kill, injure, and continue to detain
8 him, in order to compel members of the Umansky family to pay
9 ransom money as a condition for the release of Alexander Umansky.
10 The act of seizing and detaining Alexander Umansky by defendants
11 IOURI MIKHEL, JURIJUS KADAMOVAS, and PETRO KRYLOV resulted in
12 Umansky's death.
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COUNT THREE

[18 U.S.C. § 1203]

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3 On or about January 20, 2002, in Los Angeles County, within
4 the Central District of California, defendants IOURI MIKHEL,
5 JURIJUS KADAMOVAS, PETRO KRYLOV, ALEKSEJUS MARKOVSKIS, and
6 NATALYA SOLOVYEVA, who were and are not nationals of the United
7 States, seized and detained Nick Kharabadze, and threatened to
8 kill, injure, and continue to detain him, with the purpose of
9 compelling George Safiev to meet Kharabadze at a particular
10 location where Safiev could be abducted in order to compel
11 Safiev's business associate to pay ransom money as a condition
12 for the release of Kharabadze. The act of seizing and detaining
13 Nick Kharabadze by defendants IOURI MIKHEL, JURIJUS KADAMOVAS,
14 PETRO KRYLOV, ALEKSEJUS MARKOVSKIS, and NATALYA SOLOVYEVA
15 resulted in Kharabadze's death.

COUNT FOUR

[18 U.S.C. § 1203]

On or about January 20, 2002, in Los Angeles County, within the Central District of California, defendants IOURI MIKHEL, JURIJUS KADAMOVAS, PETRO KRYLOV, ALEKSEJUS MARKOVSKIS, and NATALYA SOLOVYEVA, who were and are not nationals of the United States, seized and detained George Safiev, and threatened to kill, injure, and continue to detain him, in order to compel Safiev's business associate to pay ransom money as a condition for the release of Safiev. The act of seizing and detaining George Safiev by defendants IOURI MIKHEL, JURIJUS KADAMOVAS, PETRO KRYLOV, ALEKSEJUS MARKOVSKIS, and NATALYA SOLOVYEVA resulted in Safiev's death.

1 COUNT FIVE

2 [18 U.S.C. § 1956(h)]

3 The Grand Jury hereby repeats and realleges the allegations
4 in Counts One, Two, Three, and Four as if fully set forth herein.

5 I. OBJECT OF THE CONSPIRACY

6 1. Beginning on or before October 12, 2001, and continuing
7 until on or about May 27, 2002, in Los Angeles County, within the
8 Central District of California and elsewhere, defendants IOURI
9 MIKHEL, JURIJUS KADAMOVAS, PETRO KRYLOV, and others known and
10 unknown to the Grand Jury, knowingly and willfully conspired and
11 agreed with each other to commit offenses against the United
12 States, namely:

13 2. Knowing that property involved in financial transactions
14 represented the proceeds of some form of unlawful activity, and
15 which property was, in fact, the proceeds of a specified unlawful
16 activity, that is hostage taking, in violation of 18 U.S.C.
17 § 1203, to conduct and attempt to conduct financial transactions
18 knowing that the transactions were designed in whole or in part
19 to conceal and disguise the nature, location, source, ownership,
20 and control of said proceeds, in violation of Title 18, United
21 States Code, Section 1956(a)(1)(B)(i).

22 II. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE
23 ACCOMPLISHED

24 The object of the conspiracy was to be accomplished in
25 substance as follows:

26 1. Defendants IOURI MIKHEL, JURIJUS KADAMOVAS, and PETRO
27 KRYLOV, and co-conspirators Ainar Altmanis and Aleksejus
28 Markovskis, aided and abetted by Natalya Solovyeva, would seize

1 and detain persons, and threaten to kill, injure, and continue to
2 detain those victims, in order to compel the victims, their
3 families, and their business associates to pay ransom money.

4 2. Defendants IOURI MIKHEL, JURIJUS KADAMOVAS, and co-
5 conspirators known and unknown to the Grand Jury, would demand
6 payment of ransom money from the victims, the victims' family
7 members, and the victims' business associates.

8 3. Defendant IOURI MIKHEL would open bank accounts
9 throughout the world in the names of shell corporate entities,
10 including Glenstream Ventures Inc., Sierra Technologies
11 Corporation, Stenmark Ventures Limited, and Wilsoni Financiers
12 Corporation.

13 4. Defendant IOURI MIKHEL would create false identities
14 using stolen and altered passports, including the aliases
15 Alexandre Pavlov, Thomas Noms, Yves Claude Thonnerieux, Bontcho
16 Guentchev, George Cont, and Joseph Jameson, and would open bank
17 accounts throughout the world using these aliases.

18 5. Defendant PETRO KRYLOV would obtain the use of bank
19 accounts in other peoples' names, including a Washington Mutual
20 Bank account in the name of Garri Akopnik and a Bank of America
21 account in the name of Alexander Tsesas, so that ransom proceeds
22 could be transferred through those accounts.

23 6. In order to hide and disguise the source of the ransom
24 money, defendants IOURI MIKHEL, JURIJUS KADAMOVAS, PETRO KRYLOV,
25 and co-conspirators known and unknown to the Grand Jury, would
26 cause the ransom money to be transferred through various bank
27 accounts that they controlled around the world that had been
28 opened using aliases and in the names of shell corporations.

1 7. Defendants IOURI MIKHEL, JURIJUS KADAMOVAS, PETRO
2 KRYLOV, and co-conspirators known and unknown to the Grand Jury,
3 would cause the ransom money to be transferred from the shell
4 corporation accounts and accounts in the name of aliases to
5 additional bank accounts under their control or of their
6 choosing.

7 III. OVERT ACTS

8 In furtherance of the conspiracy, and to accomplish the
9 objects of the conspiracy, defendants IOURI MIKHEL, JURIJUS
10 KADAMOVAS, PETRO KRYLOV, and others known and unknown to the
11 Grand Jury, on or about the following dates, committed the
12 following overt acts, among others, within the Central District
13 of California and elsewhere:

14 Umansky Ransom Money

15 1. Following the planning and execution of the hostage
16 taking of Alexander Umansky, and after making a \$234,628 ransom
17 demand for the release of Alexander Umansky, on December 17,
18 2001, defendants IOURI MIKHEL and JURIJUS KADAMOVAS caused the
19 Umansky family to send three wire transfers totaling \$89,628 to
20 Standard Chartered Bank in New York, with further credit to an
21 account that belonged to Andrei Agueev in the name of Al Shaza
22 Sanitary and Building Materials TRD ("Al Shaza account"), at the
23 bank's branch in Dubai, United Arab Emirates (UAE), account
24 number 01-5732905-01.

25 2. Beginning on December 20, 2001, and continuing to
26 January 7, 2002, after the Umansky ransom was received in Dubai,
27 defendants IOURI MIKHEL and JURIJUS KADAMOVAS caused Andrei
28 Agueev to withdraw a portion of the Umansky ransom that had been

1 sent to his Al Shaza account.

2 3. On December 27, 2001, defendants IOURI MIKHEL and
3 JURIJUS KADAMOVAS caused the Umansky family to wire transfer the
4 remaining ransom amount, approximately \$145,000, to Standard
5 Chartered Bank in New York, for further credit to Andrei Agueev's
6 Al Shaza account.

7 4. On December 27, 2001 and January 8, 2002, defendants
8 IOURI MIKHEL and JURIJUS KADAMOVAS caused Andrei Liapine to
9 withdraw a portion of the Umansky ransom from Andrei Agueev's Al
10 Shaza account.

11 5. Between December 27, 2001 and continuing to January 13,
12 2002, defendants IOURI MIKHEL and JURIJUS KADAMOVAS caused Andrei
13 Liapine to send four separate wire transfers totaling \$174,000 of
14 the Umansky ransom to the Glenstream Ventures account at
15 Aizkraukles Banka in Latvia, account number 1-469-0010392-0001.

16 6. On January 3, 2002 and January 15, 2002, defendants
17 IOURI MIKHEL and JURIJUS KADAMOVAS caused two separate wire
18 transfers totaling \$38,280 of the Umansky ransom to be sent from
19 Latvia to the "Designed Water World" corporate bank account at
20 the Bank of America, Sherman Oaks, California, account number
21 02473-006613.

22 7. On January 3, 2002 and January 17, 2002, defendants
23 IOURI MIKHEL and JURIJUS KADAMOVAS caused two separate wire
24 transfers totaling \$33,120 of the Umansky ransom to be sent from
25 Latvia to the Bank of America, Encino, California, account number
26 03928-07782, in the name of defendant IOURI MIKHEL and Marina
27 Karogodina.

28 8. Between January 3, 2002 and continuing to January 22,

1 2002, defendants IOURI MIKHEL and JURIJUS KADAMOVAS caused four
2 separate wire transfers totaling \$36,430 of the Umansky ransom to
3 be sent from Latvia to Washington Mutual Bank, Tarzana,
4 California, account number 386-160374-0, in the name of defendant
5 JURIJUS KADAMOVAS and Natalya Solovyeva.

6 9. On January 8, 2002, defendants IOURI MIKHEL and JURIJUS
7 KADAMOVAS, and Ainar Altmanis caused \$15,000 of the Umansky
8 ransom to be wire transferred by Andrei Liapine from Dubai to the
9 Anita Eidaka-Kazusa account at Hansa Banka in Latvia, account
10 number 552001758977.

11 10. On January 11, 2002, defendants IOURI MIKHEL and
12 JURIJUS KADAMOVAS caused \$9,850 of the Umansky ransom to be wire
13 transferred from Latvia to Citibank, Woodland Hills, California,
14 account number 040010027684, in the name of defendant IOURI
15 MIKHEL.

16 11. On January 15, 2002, defendants IOURI MIKHEL and
17 JURIJUS KADAMOVAS caused \$18,719 of the Umansky ransom that had
18 been wire transferred into the Designed Water World account to be
19 used as payment toward the American Express card issued to
20 Designed Water World in the name of defendant JURIJUS KADAMOVAS,
21 account number 3727-140763-11006.

22 12. On January 17, 2002, defendants IOURI MIKHEL and
23 JURIJUS KADAMOVAS caused \$14,380 of the Umansky ransom to be wire
24 transferred from Latvia to California Federal Bank, Woodland
25 Hills, California, account number 7384055351, in the name of
26 defendant IOURI MIKHEL.

27 13. On January 22, 2002, defendants IOURI MIKHEL, JURIJUS
28 KADAMOVAS, and PETRO KRYLOV caused \$10,000 of the Umansky ransom

1 to be wire transferred from Latvia to Bank of America,
2 Wilmington, California, account number 06365-07879, in the name
3 of Alexander Tsesas.

4 14. On January 29, 2002, defendant PETRO KRYLOV received
5 approximately \$9,800 of the Umansky ransom in cash from the Bank
6 of America, Wilmington, California, account number 06365-07879,
7 in the name of Alexander Tsesas.

8 Safiev and Kharabadze Ransom Money

9 15. Following the planning and execution of the hostage
10 taking of George Safiev and Nick Kharabadze, on January 22, 2002,
11 defendants IOURI MIKHEL, JURIJUS KADAMOVAS, and PETRO KRYLOV, and
12 co-conspirators Ainar Altmanis and Aleksejus Markovskis caused a
13 business associate of Safiev to wire transfer approximately
14 \$969,000 in ransom money to a Bank of America correspondent
15 account in Miami, Florida, for further credit to an account in
16 the name of Thomas Noms, an alias for IOURI MIKHEL, at Capital
17 Solutions, Ltd., an investment company in Kingston, Jamaica,
18 account number 010111501-45.

19 16. On January 28, 2002, defendants IOURI MIKHEL and
20 JURIJUS KADAMOVAS caused \$234,837 in funds traceable to the
21 Safiev/Kharabadze ransom to be wire transferred from Jamaica to
22 an account at Bayshore Bank & Trust, Barbados, account number
23 2000248, in the name of Wilsoni Financier Corporation, which was
24 a corporate entity that defendant IOURI MIKHEL, using the alias
25 "Alexandre Pavlov," controlled.

26 17. On January 30, 2002, defendants IOURI MIKHEL and
27 JURIJUS KADAMOVAS caused \$176,320 in funds traceable to the
28 Safiev/Kharabadze ransom to be wire transferred from Jamaica to

1 an account at Credit Agricole Indosuez (Suisee) Bank,
2 Switzerland, account number 024971, in the name of Glenstream
3 Ventures Inc., a corporate entity that defendant IOURI MIKHEL
4 controlled.

5 18. On January 30, 2002, defendants IOURI MIKHEL and
6 JURIJUS KADAMOVAS caused \$73,673 in funds traceable to the
7 Safiev/Kharabadze ransom to be wire transferred from Switzerland
8 to Calabasas Motor Cars as payment for a Mercedes Benz that
9 defendant JURIJUS KADAMOVAS purchased.

10 19. On January 31, 2002, defendants IOURI MIKHEL and
11 JURIJUS KADAMOVAS caused \$265,163 in funds traceable to the
12 Safiev/Kharabadze ransom to be wire transferred from Jamaica to
13 the Bayshore Bank & Trust account in Barbados in the name of
14 Wilsoni Financier Corporation, account number 2000248, that
15 defendant IOURI MIKHEL, using the alias "Alexandre Pavlov,"
16 controlled.

17 20. On February 2, 2002, defendants IOURI MIKHEL, JURIJUS
18 KADAMOVAS, and co-conspirator Ainar Altmanis caused \$48,730 in
19 funds traceable to the Safiev/Kharabadze ransom to be wire
20 transferred from Jamaica to the Anita Eidaka-Kazusa account at
21 Hansa Banka in Latvia, account number 552001758977.

22 21. On February 6, 2002, defendants IOURI MIKHEL and
23 JURIJUS KADAMOVAS caused \$173,680 in funds traceable to the
24 Safiev/Kharabadze ransom to be wire transferred from Jamaica to
25 an account at Aizkraukles Banka, Latvia, account number 01-469-
26 0010392-001, in the name of Glenstream Ventures Inc., a corporate
27 entity that defendant IOURI MIKHEL controlled.

28 22. On February 7, 2002, defendants IOURI MIKHEL, JURIJUS

1 KADAMOVAS, and PETRO KRYLOV caused \$31,500 in funds traceable to
2 the Safiev/Kharabadze ransom to be wire transferred to an account
3 at Bank of America, Wilmington, California, in the name of
4 Alexander Tsesas, account number 06365-07879.

5 23. After February 19, 2002, PETRO KRYLOV received
6 approximately \$30,600 of the Safiev/Kharabadze ransom that had
7 been withdrawn by checks payable to cash from the account at Bank
8 of America, Wilmington, California, in the name of Alexander
9 Tsesas, account number 06365-07879.

10 24. On February 7, 2002, defendants IOURI MIKHEL and
11 JURIJUS KADAMOVAS caused \$10,000 in funds traceable to the
12 Safiev/Kharabadze ransom to be wire transferred to an account at
13 California Federal Bank, Woodland Hills, California, in the name
14 of defendant IOURI MIKHEL, account number 7384055351.

15 25. On February 7, 2002, defendants IOURI MIKHEL and
16 JURIJUS KADAMOVAS caused \$10,000 in funds traceable to the
17 Safiev/Kharabadze ransom to be wire transferred to an account at
18 Bank of America, Encino, California, in the names of defendant
19 IOURI MIKHEL and Marina Karagodina, account number 03928-07782.

20 26. On February 7, 2002, defendants IOURI MIKHEL and
21 JURIJUS KADAMOVAS caused \$9,850 in funds traceable to the
22 Safiev/Kharabadze ransom to be wire transferred to an account at
23 Washington Mutual, Tarzana, California, in the names of defendant
24 JURIJUS KADAMOVAS and Natalya Solovyeva, account number 383-
25 160374-0.

26 27. On February 7, 2002, defendants IOURI MIKHEL and
27 JURIJUS KADAMOVAS, and Aleksejus Markovskis caused \$14,968 in
28 funds traceable to the Safiev/Kharabadze ransom to be wire

1 transferred to the Mrs. Aleksejus Markovskis account at
2 Landesbank Hessen-Thuringen Girozentrale in Germany, account
3 number 1705015596.

4 28. On February 12, 2002, defendants IOURI MIKHEL and
5 JURIJUS KADAMOVAS caused \$312,541 in funds traceable to the
6 Safiev/Kharabadze ransom to be wire transferred to account number
7 180004475 at Northwest International Bank, Seattle, Washington,
8 in the name of Sierra Technologies, a corporate entity that
9 defendant IOURI MIKHEL, using the alias "Bontcho Guentchev,"
10 controlled

11 29. On February 12, 2002, defendants IOURI MIKHEL and
12 JURIJUS KADAMOVAS caused \$24,870 in funds traceable to the
13 Safiev/Kharabadze ransom to be wire transferred to their
14 "Designed Water World" corporate bank account at Bank of America,
15 Sherman Oaks, California, account number 02473-006613.

16 30. On February 14, 2002, defendants IOURI MIKHEL, JURIJUS
17 KADAMOVAS, and PETRO KRYLOV caused \$40,000 in funds traceable to
18 the Safiev/Kharabadze ransom to be wire transferred to an account
19 at Washington Mutual Bank, Northridge, California, in the name of
20 Garri Akopnik, account number 871-081353-1.

21 31. On February 14, 2002, defendants IOURI MIKHEL and
22 JURIJUS KADAMOVAS caused \$9,890 in funds traceable to the
23 Safiev/Kharabadze ransom to be wire transferred to an account at
24 Citibank, Encino, California, in the name of defendant JURIJUS
25 KADAMOVAS, account number 040014650978.

26 32. On February 19, 2002, defendants IOURI MIKHEL and
27 JURIJUS KADAMOVAS, and co-conspirator Ainar Altmanis caused
28 \$51,270 in funds traceable to the Safiev/Kharabadze ransom to be

1 wire transferred to the Anton Eidaks-Kazusa account at Hansa
2 Banka in Latvia, account number 55200 182 8195.

3 33. On February 19, 2002, defendants IOURI MIKHEL and
4 JURIJUS KADAMOVAS caused \$161,638 in funds traceable to the
5 Safiev/Kharabadze ransom to be wire transferred to account number
6 1007010182 at Asia Europe Americas Bank, Seattle, Washington, in
7 the name of Stenmark Ventures Inc., a corporate entity that
8 defendant IOURI MIKHEL, using the alias "Yves Claude
9 Thonnerieux," controlled.

10 34. On February 24, 2002, defendant PETRO KRYLOV received
11 \$40,000 of the Safiev/Kharabadze ransom in cash from the account
12 at Washington Mutual Bank, Northridge, California, in the name of
13 Garri Akopnik, account number 871-081353-1.

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1 COUNT SIX

2 [18 U.S.C. § 371]

3 A. OBJECTS OF THE CONSPIRACY

4 Beginning after February 19, 2002, and continuing to on or
5 about March 7, 2003, in Los Angeles County, within the Central
6 District of California, defendants IOURI MIKHEL, JURIJUS
7 KADAMOVAS, and PETRO KRYLOV, and others known and unknown to the
8 Grand Jury, conspired and agreed with each other to knowingly and
9 voluntarily escape from the custody of the Metropolitan Detention
10 Center ("MDC") in Los Angeles, California, an institution in
11 which they were confined by direction of the Attorney General,
12 and such custody was by virtue of an arrest on a charge of
13 felony, in violation of Title 18, United States Code, Section
14 751(a).

15 B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE
16 ACCOMPLISHED

17 The object of the conspiracy was to be accomplished in
18 substance as follows:

19 1. Defendants IOURI MIKHEL and JURIJUS KADAMOVAS would
20 pass notes to each other and communicate through the vents at the
21 MDC to coordinate the escape.

22 2. Defendant IOURI MIKHEL and PETRO KRYLOV would pass
23 notes to each other to coordinate the escape.

24 3. Defendants IOURI MIKHEL, JURIJUS KADAMOVAS, and PETRO
25 KRYLOV would cause themselves to be moved to cells that were
26 positioned above and below each other and that abutted a common
27 stairwell that they could use to escape.

28 4. Defendant IOURI MIKHEL would recruit co-conspirators

1 outside of the MDC to purchase tools needed to facilitate the
2 escape and to help smuggle them into the MDC.

3 5. Defendant IOURI MIKHEL would recruit other inmates
4 inside the MDC to help smuggle through cell windows at the MDC
5 tools that would be used to facilitate the escape.

6 6. Defendants IOURI MIKHEL and PETRO KRYLOV would use some
7 of the tools smuggled into the MDC to dig holes in the walls of
8 their respective cells.

9 7. Defendant IOURI MIKHEL would cause money to be paid to
10 individuals outside of the MDC and to other inmates inside the
11 MDC who would assist with the escape.

12 C. OVERT ACTS

13 In furtherance of the conspiracy and to accomplish the
14 object of the conspiracy, defendants IOURI MIKHEL, JURIJUS
15 KADAMOVAS, and PETRO KRYLOV, and others known and unknown to the
16 Grand Jury, on or about the following dates committed the
17 following overt acts, among others, within the Central District
18 of California:

19 1. In May 2002, defendant JURIJUS KADAMOVAS caused himself
20 to be moved to cell 913 in the MDC, which abutted a stairwell.

21 2. On November 4, 2002, defendant IOURI MIKHEL caused
22 himself to be moved to cell 518, next to the same stairwell that
23 defendant JURIJUS KADAMOVAS' cell abutted.

24 3. On March 3, 2003, defendant PETRO KRYLOV caused himself
25 to be moved to cell 616, next to the same stairwell that abutted
26 defendant JURIJUS KADAMOVAS' and defendant IOURI MIKHEL'S cells.

27 4. In March 2003, defendant IOURI MIKHEL caused monies to
28 be paid to other inmates at the MDC to secure their assistance

1 with the escape attempt.

2 5. In February 2003, in order to facilitate the escape,
3 defendant IOURI MIKHEL arranged to have two pre-paid cellular
4 telephones, along with a telephone charger and pre-paid telephone
5 calling cards, brought into the MDC through a cell window so that
6 he could communicate with persons outside of the MDC who could
7 assist with the escape.

8 6. On February 13, 2003, IOURI MIKHEL caused \$19,322 to be
9 wire transferred from his girlfriend in England to co-conspirator
10 Sabrina Tynan ("Tynan") in Los Angeles to pay Tynan for assisting
11 with the escape.

12 7. In January or February 2003, in order to facilitate the
13 escape, defendant IOURI MIKHEL arranged to have tools brought
14 into the MDC that could be used for the escape.

15 8. Sometime after January or February 2003, defendant
16 IOURI MIKHEL caused some of these tools to be passed to defendant
17 PETRO KRYLOV.

18 9. Sometime after January or February 2003, defendant
19 IOURI MIKHEL began digging a hole behind the mirror in his cell.

20 10. Sometime after March 3, 2003, defendant PETRO KRYLOV
21 began digging a hole behind the mirror in his cell.

22 11. Beginning after January 2003 and continuing to March 7,
23 2003, defendant IOURI MIKHEL kept the following items hidden in
24 his cell to facilitate his escape: a Cingular wireless brand
25 cellular telephone; a JVC brand digital video camcorder; a
26 camcorder charger; various electrical cords used with the camera
27 system; tin snip pliers; four 9/16 "Craftsman" brand ratchet
28 wrenches; a 12-inch mini hand saw; six different screwdrivers,

1 one with various different tips; three pairs of black "Craftsman"
2 brand mechanics gloves; a bottle of black "Gorilla" brand glue; a
3 24-inch bolt cutter; a hand hack saw; a 12-inch crescent wrench;
4 two 10-inch crescent wrenches; two sets of adjustable pliers with
5 blue handles; a pair of sheet metal scissors; "Craftsman" brand
6 wire snippers; two rolls of black electrical tape; a 12-inch
7 knife with black handle; a "Craftsman" brand box cutter; a 10½ -
8 inch sharpened metal rod; a Sony Ericsson brand cellular
9 telephone; a cellular telephone battery; a cellular telephone
10 charger; three 6-inch black replacement blades used on the 12-
11 inch mini hand saw; a hacksaw blade cut in two pieces; two packs
12 of heavy duty replacement blades for the box cutter; two "L-
13 shaped" pieces of metal 3 inches in length; two sticks of "crazy
14 glue"; an 8-inch standard screwdriver; and a pencil with a roll
15 of string attached.

16 12. Beginning after January 2003 and continuing to March 7,
17 2003, defendant PETRO KRYLOV kept hidden in his cell the
18 following items to facilitate his escape: two 5¾-inch pieces of
19 a hack saw blade; wiring cut from various portable stereo
20 headphones; and a screwdriver.

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COUNT SEVEN

[18 U.S.C. § 981(a)(1)(C), 21 U.S.C. § 853,
and 28 U.S.C. § 2461(c)]

1. Pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461(c), each defendant who is convicted of the offenses set forth in Counts One through Four of this Indictment shall forfeit to the United States the following property:

a. All right, title, and interest in any and all property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Section 1203 (an offense constituting "specified unlawful activity" as defined in Title 18, United States Code, Section 1956(c)(7)(D)). Specific property subject to forfeiture for the reasons set out above includes, but is not limited to, a sum of money equal to the total amount of money involved in each offense, or conspiracy to commit such offense, for which the defendant is convicted. If more than one defendant is convicted of an offense, the defendants so convicted are jointly and severally liable for the amount involved in such offense.

2. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), each defendant shall forfeit substitute property, up to the value of the amount described in paragraph 1, if, by any act or omission of the defendant, the property described in paragraph 1, or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred, sold to or deposited with a

1 third party; has been placed beyond the jurisdiction of the
2 court; has been substantially diminished in value; or has been
3 commingled with other property which cannot be divided without
4 difficulty.

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1 NOTICE OF SPECIAL FINDINGS

2 The allegations of Counts One, Two, Three, and Four of this
3 Indictment are hereby realleged and incorporated by reference as
4 if fully set forth herein.

5 DEFENDANT IOURI MIKHEL

6 As to Counts One, Two, Three, and Four, defendant IOURI
7 MIKHEL:

8 1. Was more than 18 years of age at the time of the
9 offenses (18 U.S.C. § 3591(a));

10 2. Intentionally killed the victims (18 U.S.C.
11 § 3591(a)(2)(A));

12 3. Intentionally inflicted serious bodily injury that
13 resulted in the death of the victims (18 U.S.C. § 3591(a)(2)(B));

14 4. Intentionally participated in an act, contemplating
15 that the life of a person would be taken or intending that lethal
16 force would be used in connection with a person, other than a
17 participant in the offense, and the victims died as a result of
18 the act (18 U.S.C. § 3591(a)(2)(C));

19 5. Intentionally and specifically engaged in an act of
20 violence knowing that the act created a grave risk of death to a
21 person, other than one of the participants in the offense, such
22 that participation in the act constituted a reckless disregard
23 for human life and the victims died as a result of the act. (18
24 U.S.C. § 3591(a)(2)(D));

25 6. In committing the offenses, the death and injury
26 resulting in death occurred during the commission and attempted
27 commission of an offense under 18 U.S.C. § 1203 (conspiracy to
28 commit hostage taking and hostage taking) (18 U.S.C.

1 § 3592(c)(1));

2 7. Procured the commission of the homicide offenses by
3 payment, and promise of payment, of something of pecuniary value,
4 namely a share of ransom proceeds (18 U.S.C. § 3592(c)(7));

5 8. Committed the offenses after substantial planning and
6 premeditation to cause the death of a person (18 U.S.C.
7 § 3592(c)(9)); and

8 9. Killed and attempted to kill more than one person in a
9 single criminal episode (18 U.S.C. § 3592(c)(16)).

10 All pursuant to Title 18, United States Code, Sections 3591
11 and 3592.

12 DEFENDANT JURIJUS KADAMOVAS

13 As to Counts One, Two, Three, and Four, defendant KADAMOVAS:

14 1. Was more than 18 years of age at the time of the
15 offenses (18 U.S.C. § 3591(a));

16 2. Intentionally killed the victims (18 U.S.C.
17 § 3591(a)(2)(A));

18 3. Intentionally inflicted serious bodily injury that
19 resulted in the death of the victims (18 U.S.C. § 3591(a)(2)(B));

20 4. Intentionally participated in an act, contemplating
21 that the life of a person would be taken or intending that lethal
22 force would be used in connection with a person, other than a
23 participant in the offense, and the victims died as a result of
24 the act (18 U.S.C. § 3591(a)(2)(C));

25 5. Intentionally and specifically engaged in an act of
26 violence knowing that the act created a grave risk of death to a
27 person, other than one of the participants in the offense, such
28 that participation in the act constituted a reckless disregard

1 for human life and the victims died as a result of the act. (18
2 U.S.C. § 3591(a)(2)(D));

3 6. In committing the offenses, the death and injury
4 resulting in death occurred during the commission and attempted
5 commission of an offense under 18 U.S.C. § 1203 (conspiracy to
6 commit hostage taking and hostage taking) (18 U.S.C.
7 § 3592(c)(1));

8 7. Procured the commission of the homicide offenses by
9 payment, and promise of payment, of something of pecuniary value,
10 namely a share of ransom proceeds (18 U.S.C. § 3592(c)(7));

11 8. Committed the offenses after substantial planning and
12 premeditation to cause the death of a person (18 U.S.C.
13 § 3592(c)(9)); and

14 9. Killed and attempted to kill more than one person in a
15 single criminal episode (18 U.S.C. § 3592(c)(16)).

16 All pursuant to Title 18, United States Code, Sections 3591
17 and 3592.

18 DEFENDANT PETRO KRYLOV

19 As to Counts One, Two, Three, and Four, defendant KRYLOV:

20 1. Was more than 18 years of age at the time of the
21 offenses (18 U.S.C. § 3591(a));

22 2. Intentionally killed the victims (18 U.S.C.
23 § 3591(a)(2)(A));

24 3. Intentionally inflicted serious bodily injury that
25 resulted in the death of the victims (18 U.S.C. § 3591(a)(2)(B));

26 4. Intentionally participated in an act, contemplating
27 that the life of a person would be taken or intending that lethal
28 force would be used in connection with a person, other than a

1 participant in the offense, and the victims died as a result of
2 the act (18 U.S.C. § 3591(a)(2)(C));

3 5. Intentionally and specifically engaged in an act of
4 violence knowing that the act created a grave risk of death to a
5 person, other than one of the participants in the offense, such
6 that participation in the act constituted a reckless disregard
7 for human life and the victims died as a result of the act. (18
8 U.S.C. § 3591(a)(2)(D));

9 6. In committing the offenses, the death and injury
10 resulting in death occurred during the commission and attempted
11 commission of an offense under 18 U.S.C. § 1203 (conspiracy to
12 commit hostage taking and hostage taking) (18 U.S.C.
13 § 3592(c)(1));

14 7. Committed the homicide offenses as consideration for
15 the receipt, and the expectation of the receipt, of something of
16 pecuniary value, namely ransom proceeds (18 U.S.C. § 3592(c));

17 8. Committed the offenses after substantial planning and
18 premeditation to cause the death of a person (18 U.S.C.
19 § 3592(c)(9)); and

20 9. Killed or attempted to kill more than one person in a

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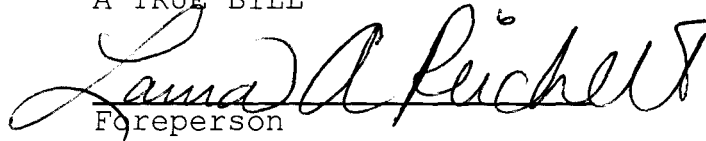
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1 single criminal episode (18 U.S.C. § 3592(c)(16)).

2 All pursuant to Title 18, United States Code, Sections 3591
3 and 3592.

4 A TRUE BILL

5 
6 Foreperson

7 DEBRA W. YANG
8 United States Attorney

9 

10 STEVEN D. CLYMER
11 Special Assistant United States Attorney
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