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AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

District of Columbia

)

)

United States of America

Ilya Lichtenstein (AKA: Ilya "Dutch" Lichtenstein, Ilya Likhtenshteyn) (DOB: XXXXXXX), and Heather Rhiannon Morgan (AKA: Razzlekhan) DOB: XXXXXXXX) Case: 1:22-mj-00022 Assigned to: Judge Meriweather, Robin M. Assign Date: 2/7/2022 Description: COMPLAINT W/ ARREST WARRANT

Defendant(s)

## **CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 2016 to February 2022 in the county of \_\_\_\_\_\_ in the District of Columbia , the defendant(s) violated:

Code Section

**Offense** Description

18 U.S.C. § 1956(h) (Money Laundering Conspiracy)18 U.S.C. § 371 (Conspiracy To Defraud the United States)

This criminal complaint is based on these facts: See attached statement of facts.

X Continued on the attached sheet.

Complainant's signature

Christopher Janczewski, Special Agent Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: 02/07/2022

Robin M. Meriweather 2022.02.07 11:10:43 -05'00'

Judge's signature

Robin M. Meriweather, U.S. Magistrate Judge Printed name and title

City and state:

Washington, D.C.