

Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington.

July 10 20 24
Ravi Subramanian, Clerk
By [Signature] Deputy

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,

NO. **CR 24-115 TL**

INDICTMENT

v.

VITALIY F. BOBAK and
ANDREY A. BALUN,
Defendants.

The Grand Jury charges that:

COUNT 1

(Conspiracy to Transport Stolen Property in Interstate Commerce)

A. Background

1. VITALIY F. BOBAK and ANDREY A. BALUN co-owned, with equal 50 percent shares, a Washington business entity named MBA Trading LLC. MBA Trading LLC was the registered owner of a Burien storefront doing business as "We Buy Gold, Silver, and Electronics," hereinafter "We Buy." BALUN initially owned MBA Trading and its We Buy store with another partner, operating the business in the manner described below since at least 2018. In approximately December 2020, BOBAK purchased the

1 previous partner's share of the business and BALUN and BOBAK continued the
2 operation though December 19, 2023.

3 2. As more fully described below, We Buy's business model was to purchase
4 stolen merchandise from individual sellers, otherwise known as boosters, at prices
5 reduced to reflect the fact that the goods were stolen. It was obvious to defendants that
6 the goods were stolen based on circumstances surrounding the sales, including, for
7 example:

- 8 • The goods appeared to be new, and often had anti-theft devices
affixed to them;
- 9 • The goods were often labeled "not for resale" or related language;
- 10 • Boosters sometimes disclosed that the goods were stolen; and
- 11 • Boosters offered the goods for sale at a price far below their market
value.

12 After purchasing the stolen merchandise, defendants offered the merchandise for
13 sale at a higher price through eBay and Amazon. Defendants then shipped the stolen
14 merchandise from Washington to buyers in other states or countries.

15 3. BALUN and BOBAK did not report We Buy's purchases to the state of
16 Washington, as required for legitimate pawnbrokers and secondhand dealers by Revised
17 Code of Washington Chapter 19.60 and associated regulations.

18 **B. The Conspiracy**

19 4. Beginning at a time unknown, but no later than January 2018, and
20 continuing through on or about December 19, 2023, in King County, within the Western
21 District of Washington, and elsewhere, ANDREY A. BALUN and VITALIY F. BOBAK
22 along with others known and unknown, did knowingly and willfully conspire, combine,
23 confederate, and agree to commit an offense against the United States, that is: Interstate
24 Transportation of Stolen Property, in violation of Title 18, United States Code, Sections
25 2314 and 2, as charged in Count 2.
26
27

1 **C. Manner and Means**

2 The defendants and their co-conspirators acted in the following manner, and used
3 the following means, to effect the conspiracy:

4 5. BOBAK operated We Buy by allowing one booster, or one group of
5 boosters, to enter the storefront at a time.

6 6. BOBAK purchased stolen merchandise, predominately over-the-counter
7 medication and health and beauty products from these boosters.

8 7. The products BOBAK purchased often contained visible anti-theft devices
9 or stickers attached. BOBAK removed these anti-theft devices with heat guns, drills, and
10 other tools, and used solutions such as “Goo-Gone” to remove left-over residue. BOBAK
11 also taught the boosters how to remove the anti-theft devices themselves.

12 8. The conspirators used a warehouse adjacent to the We Buy storefront to
13 store, package, and ship the stolen merchandise. BOBAK also used his personal
14 residence to store, package, and ship some of the stolen merchandise.

15 9. BOBAK hired employees to assist in this process. BOBAK supervised and
16 directed the work of these employees. BOBAK paid these employees in cash.

17 10. BOBAK listed, or directed subordinate employees to list, the stolen
18 merchandise for sale on an eBay store called “abystore555” and an Amazon store called
19 “Medikus.”

20 **eBay store “Abystore555”**

21 11. The conspirators operated an online store on eBay using the moniker
22 “abystore555.”

23 a. The abystore555 eBay account was registered to BOBAK.

24 b. Abystore555’s registered address is BOBAK’s Federal Way,
25 Washington residential address.

1 c. Abcstore555 had no sources of inventory other than the stolen
2 merchandise BOBAK and BALUN purchased from boosters at We Buy.

3 d. The conspirators conducted approximately 90,000 sale transactions
4 through the abcstore555 eBay store between January 1, 2022 and November 28, 2023,
5 totaling approximately \$3 million. These transactions predominately involved the sale of
6 stolen over-the-counter medications, supplements, and health and beauty products.

7 e. BOBAK directed eBay to deposit the proceeds of these sales directly
8 into two accounts he controlled at Bank of America – an individual account held in his
9 name, ending x2586 (BOBAK BOA) and a joint account he held with his spouse, ending
10 x3971 (BOBAK BOA JOINT). BOBAK transferred some of the proceeds eBay deposited
11 into the joint account to his individual account. Between January 1, 2022 and November
12 28, 2023, eBay deposited more than \$2 million into these two accounts.

13 **Amazon store “Medikus”**

14 12. The conspirators operated an online store on Amazon using the moniker
15 “Medikus.”

16 a. The Medikus Amazon account was registered to BALUN.

17 b. Medikus had virtually no sources of inventory other than the stolen
18 merchandise purchased from boosters at We Buy.

19 c. The conspirators conducted over 60,000 sale transactions through
20 the Medikus Amazon store between January 1, 2022 and December 18, 2023, totaling
21 approximately \$1.6 million. These transactions predominately involved the sale of stolen
22 over-the-counter medications, supplements, and health and beauty products.

23 d. BALUN directed Amazon to deposit the proceeds from these sales
24 directly to accounts he controlled, first at JPMorgan Chase Bank, and then, beginning in
25 January 2022, to an account at Sound Credit Union ending x6253, held in the name
26 Medicus LLC (MEDICUS SCU), for which BALUN was the only authorized signatory.

1 Between January 25, 2022 and December 12, 2023, Amazon made approximately 76
2 deposits to the MEDICUS SCU account, totaling approximately \$1 million.

3 13. Individual buyers from across the country and the world purchased the
4 stolen merchandise from these online stores, with large quantities of products purchased
5 by customers in states such as Virginia, Florida, and New Jersey, and countries such as
6 Norway, Mexico, and Sweden.

7 14. BOBAK and BALUN then shipped, caused to be shipped, or directed
8 subordinate employees to ship, the stolen merchandise to customers located in these
9 states and foreign countries, thereby causing the stolen merchandise to be transported to
10 those locations.

11 15. On a typical day BOBAK, or those working at his direction, shipped 165-
12 286 outgoing packages to other states or foreign countries.

13 16. Parcels fulfilling orders placed on the abstore555 eBay store and the
14 Medikus Amazon store were shipped from the We Buy storefront and from BOBAK's
15 residence.

16 17. Between January 1, 2022 and November 28, 2023, BOBAK and BALUN
17 conducted or caused to be conducted approximately 156,934 sale transactions through the
18 abcstore555 eBay and Medikus Amazon stores, with a combined sales total of over \$4.5
19 million.

20 18. Between January 1, 2022 and November 28, 2023, BOBAK and BALUN
21 caused eBay and Amazon to deposit approximately \$3.1 million of proceeds from the
22 sale of the stolen goods to accounts they controlled. Subsequently, the conspirators
23 conducted a variety of financial transactions with these proceeds, including paying rent
24 on the WeBuy storefront and adjacent warehouse. They also withdrew more than \$1
25 million in cash, which they used to continue the criminal operation by purchasing
26 additional stolen property to sell on eBay and Amazon.

1 19. As of December 19, 2023, the conspirators possessed more than 74,000
2 items of stolen merchandise valued at approximately \$2.4 million.

3 **D. Overt Acts**

4 20. In furtherance of the conspiracy, and to effect its object, within King
5 County, in the Western District of Washington, and elsewhere, BOBAK and BALUN,
6 together with other individuals known and unknown, committed and caused to be
7 committed, among others, the following overt acts, which are representative of the
8 various overt acts undertaken in furtherance of the conspiracy:

9 a. On or about April 16, 2021, BALUN sent a text message to BOBAK
10 advising how to respond to a complaint that the Medikus Amazon store was not an
11 authorized seller of products it had offered for sale. BALUN drafted the response and
12 sent it to BOBAK.

13 b. On or about April 26, 2023, at the We Buy store, BOBAK purchased
14 numerous items presented to him as obviously stolen merchandise, including, among
15 other items, a Braun brand electric trimmer that had anti-theft stickers and a “spider
16 wrap” anti-theft alarm device affixed to it.

17 c. On or about July 25, 2023, BOBAK caused the Braun electric
18 trimmer to be listed for sale on the abcstore555 site. That same week, BOBAK shipped or
19 directed the shipment of the trimmer, via United States Postal Service, to an address in
20 Rhode Island. On or about August 1, 2023, the package arrived in Rhode Island. The
21 package’s return address listed BOBAK’s name and home address. The package
22 contained a Braun electric trimmer with distinct markings identifying it as the same
23 Braun electric trimmer BOBAK purchased on April 26, 2023.

24 d. On or about October 24, 2023, at the We Buy store, BOBAK
25 purchased, among other items presented as stolen, a brand-new Keurig Coffee maker.
26
27

1 e. On or about November 15, 2024, BOBAK caused the same model
2 Keurig Coffee maker to be listed for sale on the Medikus Amazon store. On or about
3 November 17, 2023, BOBAK shipped or directed the shipment of the Keurig Coffee
4 maker, via United States Postal Service, to an address in Oregon. The package's return
5 address listed a Bellevue address that Medicus LLC is registered at. The package
6 contained a Keurig Coffee maker with the same serial number as the coffee maker
7 purchased by BOBAK on October 24, 2023.

8 f. On December 9, 2023, at the We Buy store, BOBAK purchased,
9 from a single booster, numerous items presented as stolen, including Sonicare electric
10 toothbrushes with retail security stickers affixed to them, Rogaine products with security
11 stickers on them, and bottles of wine with device cap locks affixed to them. BOBAK
12 used a torch lighter to remove the security stickers. BOBAK then used a drill to remove
13 the security cap from the wine bottles.

14 All in violation of Title 18, United States Code, Section 371.

15 **COUNT 2**

16 **(Interstate Transportation of Stolen Property)**

17 21. The allegations set forth in the foregoing paragraphs are re-alleged and
18 incorporated as if fully set forth herein.

19 22. Beginning at a time unknown but not later than January 2018, and
20 continuing through on or about December 19, 2023, in King County, in the Western
21 District of Washington, and elsewhere, VITALIY F. BOBAK and ANDREY A. BALUN,
22 and others known and unknown, did unlawfully transport, transmit, and transfer in
23 interstate commerce, from Washington to other states and countries, including, but not
24 limited to, Rhode Island, Oregon, New Jersey, Florida, Virginia, Norway, Mexico, and
25 Sweden, goods, wares, and merchandise, of the value of \$5,000 or more, knowing the
26 same to have been stolen, converted, and taken by fraud.

1 23. The Grand Jury further alleges that this offense was committed during and
2 in furtherance of the conspiracy charged in Count 1, above.

3 All in violation of Title 18, United States Code, Sections 2314 and 2.
4

5 **COUNT 3**

6 **(Conspiracy to Commit Money Laundering)**

7 24. The allegations set forth in the foregoing paragraphs are re-alleged and
8 incorporated as if fully set forth herein.

9 **A. The Offense**

10 25. Beginning at a time unknown, but no later than January 2018, and
11 continuing through at least December 19, 2023, in King County, within the Western
12 District of Washington, and elsewhere, VITALIY F. BOBAK and ANDREY A. BALUN,
13 along with others known and unknown, did knowingly conspire, combine, confederate,
14 and agree with each other and with other persons known and unknown to the Grand Jury
15 to commit offenses against the United States in violation of Title 18, United States Code,
16 Section 1956 and Section 1957, that is:

17 **1956(a)(1)(A)(i)**

18 a. to knowingly conduct and attempt to conduct financial transactions
19 affecting interstate and foreign commerce, which transactions involved the proceeds of
20 specified unlawful activity, that is, Conspiracy to Commit Interstate Transportation of
21 Stolen Property, in violation of Title 18, United States Code, Section 371, as charged in
22 Count 1, and Interstate Transportation of Stolen Property, in violation of Title 18, United
23 States Code, Sections 2314 and 2, as charged in Count 2, with the intent to promote the
24 carrying on of specified unlawful activity, that is, Conspiracy to Commit Interstate
25 Transportation of Stolen Property, in violation of Title 18, United States Code, Section
26 371, and Interstate Transportation of Stolen Property, in violation of Title 18, United
27 States Code, Sections 2314 and 2, and that while conducting and attempting to conduct

1 such financial transactions, knew that the property involved in the financial transactions
2 represented the proceeds of some form of unlawful activity, in violation of Title 18,
3 United States Code, Section 1956(a)(1)(A)(i); and

4 **1956(a)(1)(B)(i)**

5 b. to knowingly conduct and attempt to conduct financial transactions
6 affecting interstate and foreign commerce, which transactions involved the proceeds of
7 specified unlawful activity, that is, Conspiracy to Commit Interstate Transportation of
8 Stolen Property, in violation of Title 18, United States Code, Section 371, as charged in
9 Count 1, and Interstate Transportation of Stolen Property, in violation of Title 18, United
10 States Code, Sections 2314 and 2, as charged in Count 2, knowing that the transactions
11 were designed in whole and in part to conceal and disguise the nature, location, source,
12 ownership, and control of the proceeds of specified unlawful activity, and knowing that
13 the property involved in the financial transactions represented the proceeds of some form
14 of unlawful activity, in violation of Title 18, United States Code, Section
15 1956(a)(1)(B)(i); and

16 **1957(a)**

17 c. to knowingly engage and attempt to engage in monetary transactions
18 by, through and to a financial institution, affecting interstate and foreign commerce, in
19 criminally derived property of a value greater than \$10,000, such property having been
20 derived from specified unlawful activity, that is, Conspiracy to Commit Interstate
21 Transportation of Stolen Property, in violation of Title 18, United States Code, Section
22 371, as charged in Count 1, and Interstate Transportation of Stolen Property, as charged
23 in Count 2, in violation of Title 18, United States Code, Sections 2314 and 2, in violation
24 of Title 18, United States Code, Section 1957(a).

1 **B. Object of the Conspiracy**

2 26. The objects of the conspiracy were:

3 a. to promote Conspiracy to Commit Interstate Transportation of
4 Stolen Property, in violation of Title 18, United States Code, Section 371, and Interstate
5 Transportation of Stolen Property, in violation of Title 18, United States Code, Sections
6 2314 and 2;

7 b. to conceal and disguise the nature, location, source, ownership, and
8 control of proceeds of Conspiracy to Commit Interstate Transportation of Stolen
9 Property, in violation of Title 18, United States Code, Section 371, and Interstate
10 Transportation of Stolen Property, in violation of Title 18, United States Code, Sections
11 2314 and 2; and

12 c. to illegally enrich the conspirators.

13 27. In furtherance of the objects of the conspiracy, and to attain the ends
14 thereof, BOBAK and BALUN, and others known and unknown to the Grand Jury,
15 conducted, caused to be conducted, and aided and abetted the conducting of the financial
16 and monetary transactions described herein, among others.

17 **C. Manner and Means of the Conspiracy**

18 The defendants and their co-conspirators acted in the following manner, and used
19 the following means, to effect the conspiracy:

20 28. BOBAK and BALUN, and others, arranged to sell on eBay and Amazon
21 stolen merchandise they purchased from boosters at We Buy, transport that stolen
22 merchandise to purchasers in various states and foreign countries, and receive payment
23 from the sale of that stolen merchandise from eBay and Amazon into financial accounts
24 they controlled.

25 29. BOBAK and BALUN caused eBay and Amazon to deposit funds from sale
26 of the stolen goods to accounts they controlled at different financial institutions. The
27

1 deposits made by eBay and Amazon to BOBAK and BALUN's financial accounts are
2 proceeds of the Conspiracy to Commit Interstate Transportation of Stolen Property, in
3 violation of Title 18, United States Code, Section 371, as charged in Count 1, and
4 Interstate Transportation of Stolen Property, in violation of Title 18, United States Code,
5 Sections 2314 and 2, as charged in Count 2.

6 30. BOBAK and BALUN caused eBay to deposit funds from the sale of stolen
7 goods on the abcstore555 store to accounts at Bank of America, the BOBAK BOA and
8 BOBAK BOA JOINT accounts. Between January 1, 2022 and November 28, 2023, the
9 conspirators caused eBay to deposit more than \$2 million directly into these two financial
10 accounts. We Buy was the only source of the merchandise sold on the abcstore555 eBay
11 store.

12 31. BOBAK and BALUN caused Amazon to deposit funds from the sale of
13 stolen goods on Medikus to the MEDICUS SCU account. Between January 25, 2022 and
14 October 31, 2023, the conspirators caused Amazon to deposit approximately \$1 million
15 directly into the MEDICUS SCU account.

16 32. After eBay and Amazon deposited proceeds from the sale of the stolen
17 goods into the BOBAK BOA, BOBAK BOA JOINT, and MEDICUS SCU accounts,
18 BOBAK and BALUN, and others, conducted and caused to be conducted financial
19 transactions to transfer the proceeds from those accounts, including to accounts at other
20 financial institutions and held in other names. These financial transactions included wire
21 transfers, ACH transfers, purchases of cashier's checks, deposit of checks and cashier's
22 checks to other accounts, and withdrawal and deposit of cash.

23 33. BOBAK and BALUN caused some of the proceeds to change forms and
24 locations multiple times as a result of these financial transactions, further obfuscating the
25 nature, location, source, ownership, and control of the proceeds.
26
27

1 34. BOBAK and BALUN also withdrew some of the proceeds they transferred
2 to these other accounts in cash, and then used that cash to expand the scope and duration
3 of the Conspiracy to Commit Interstate Transportation of Stolen Property and to promote
4 additional Interstate Transportation of Stolen Property offenses by purchasing additional
5 stolen property to sell on eBay and Amazon.

6 35. BOBAK and BALUN transferred and caused to be transferred most of the
7 remaining proceeds they received to themselves, their other businesses, and their family
8 members, to support their lifestyles.

9 **Flow of Proceeds Received from sales on eBay**

10 36. BOBAK and BALUN used the BOBAK BOA JOINT account as one
11 funnel account to receive deposits of proceeds from eBay and distribute those proceeds to
12 other accounts, including an account at Sound Credit Union ending x0518, held in the
13 name of MBA Trading LLC (MBA Trading SCU x0518). BOBAK and BALUN each
14 held signatory authority over the MBA Trading SCU x0518 account.

15 37. BOBAK and BALUN conducted and caused to be conducted these
16 financial transactions with the intent to conceal and disguise the nature, location, source,
17 ownership, and control of these proceeds, in violation of Title 18, United States Code,
18 Section 1956(a)(1)(B)(i). Each of these financial transactions also involved more than
19 \$10,000 of criminal proceeds, in violation of Title 18, United States Code, Section
20 1957(a).

21 38. BOBAK and BALUN also used the BOBAK BOA account as a funnel
22 account to receive deposits of proceeds from eBay and distribute those proceeds to other
23 accounts. For example, between January 1, 2022 and November 28, 2023, eBay
24 deposited approximately \$2 million into the BOBAK BOA account. Between March 4,
25 2022 and November 15, 2023, BOBAK and BALUN conducted and caused to be
26 conducted, financial transactions to transfer at least \$1.5 million of proceeds from the
27

1 sale of the stolen goods on the abcstore555 eBay store from the BOBAK BOA account
2 into an account at Sound Credit Union ending x6436, held in the name of MBA Trading
3 LLC (MBA Trading SCU x6436).

4 39. BOBAK BOA account statements reflect virtually no activity in the
5 account other than the deposits from eBay and outgoing checks that were deposited into
6 the MBA Trading SCU x6436 account.

7 40. BOBAK and BALUN conducted and caused to be conducted these
8 financial transactions with the intent to conceal and disguise the nature, location, source,
9 ownership, and control of these proceeds, in violation of Title 18, United States Code,
10 Section 1956(a)(1)(B)(i). Each of these financial transactions also involved more than
11 \$10,000 of criminal proceeds, in violation of Title 18, United States Code, Section
12 1957(a).

13 41. BOBAK and BALUN also conducted and caused to be conducted these
14 financial transactions with the intent to expand the scope and duration of the Conspiracy
15 to Commit Interstate Transportation of Stolen Property, in violation of Title 18, United
16 States Code, Section 371, and to promote the commission of additional offenses of
17 Interstate Transportation of Stolen Property, in violation of Title 18 United States Code,
18 Sections 2314 and 2. These financial transactions facilitated subsequent withdrawal of the
19 proceeds from the MBA Trading SCU x6436 account in cash, which BOBAK and
20 BALUN used to purchase additional stolen goods to sell on eBay and Amazon to
21 continue the ongoing criminal operation.

22 42. Shortly after making the transactions noted above, BOBAK and BALUN,
23 made and caused to be made a series of cash withdrawals from MBA Trading SCU
24 x6436 account. Between March 4, 2022 and October 26, 2023, these withdrawals from
25 totaled approximately \$1 million.

1 43. After the proceeds eBay deposited into BOBAK's accounts at Bank of
2 America were funneled into the MBA Trading SCU x6436, BOBAK and BALUN
3 conducted and caused to be conducted additional financial transactions, through ACH
4 transfers and check deposits, to disguise these criminal proceeds as legitimate "payroll"
5 payments from MBA Trading LLC to BOBAK and BALUN. For example, in this
6 manner they moved over \$100,000 into a US Bank account (USB x7802) held in
7 BALUN's name.

8 44. The conspirators also disguised the criminal proceeds by using them to pay
9 for luxury items. For example, on July 17, 2023, BOBAK laundered approximately
10 \$66,000.00 of the proceeds the conspirators transferred to the BOBAK JPMC account by
11 purchasing a 2023 Lexus NX. BOBAK paid for the 2023 Lexus NX in a single
12 transaction, using a debit card linked to the BOBAK JPMC account, which received the
13 "payroll" transactions from the MBA Trading SCU x6436 account. Approximately
14 \$66,000.00 of the \$67,300 purchase is directly traceable to criminal proceeds of the
15 Conspiracy to Commit Interstate Transportation of Stolen Property, in violation of 18
16 U.S.C. § 2 and 2315 and Interstate Transportation of Stolen Property, in violation of 18
17 U.S.C. § 2 and §2314 offenses.

18 **Flow of Proceeds from Sales on Amazon**

19 45. BALUN and BOBAK caused Amazon to deposit proceeds from the sale of
20 stolen goods on the Medikus Amazon store to the MEDICUS SCU account. Between
21 January 25, 2022, and October 31, 2023, the conspirators caused Amazon to deposit
22 approximately \$1million directly into the MEDICUS SCU account.

23 46. BALUN and BOBAK then conducted and caused to be conducted financial
24 transactions transferring some of the proceeds Amazon deposited into the MEDICUS
25 SCU account to the MBA Trading SCU x6436 account.

26 47. BALUN also conducted and caused to be conducted numerous financial
27 transactions to transfer proceeds Amazon had deposited into the MEDICUS SCU account
to himself and members of his family.

1 48. BALUN also conducted and caused to be conducted numerous financial
2 transactions to transfer proceeds that Amazon had deposited into the MEDICUS SCU
3 account to other companies he controlled.

4 49. BALUN and BOBAK used some of the proceeds that Amazon had
5 deposited into the MEDICUS SCU account to make monthly rent payments for the We
6 Buy storefront and warehouse.

7 50. BALUN also purchased and caused to be purchased large cashier's checks
8 using proceeds Amazon had deposited into the MEDICUS SCU account.

9 51. BALUN also conducted financial transactions to transfer proceeds that
10 Amazon had deposited into the MEDICUS SCU account to his USB x7802 account (the
11 same account to which eBay proceeds were transferred, via MBA Trading SCU x6436).

12 52. After conducting successive financial transactions to transfer proceeds from
13 the MEDICUS SCU (Amazon proceeds) and MBA Trading SCU (eBay proceeds)
14 accounts to his USB x7208 account, BALUN conducted additional financial transactions
15 from his USB x7208 account to further disguise and conceal the proceeds. For example:

16 53. On February 17, 2023, BALUN caused a check in the amount of \$37,000 to
17 be drawn on the MEDICUS SCU account and deposited into the USB x7208 account. On
18 February 28, 2023, BALUN withdrew \$37,000 from USB x7208 and purchased a
19 \$37,000 Cashier's Check, payable to T.I., with a memo reading "house." On or about
20 February 28, 2023 T.I. purchased real property located on Summer Palace Way, Las
21 Vegas, NV, for approximately \$543,000. Statements for a bank account opened on or
22 about March 2, 2023 at U.S. Bank, ending x2348, and held in the names of T.I., N.B., and
23 BALUN, are addressed to the real property on Summer Palace Way, Las Vegas, NV.

24 All in violation of Title 18, United States Code, Section 1956(h).

25 **COUNTS 4 – 6**

26 **(Concealment Money Laundering)**

27 54. The allegations set forth in the foregoing paragraphs are re-alleged and
incorporated as if fully set forth herein.

1 55. On or about the dates set forth below, in the Western District of
 2 Washington, and elsewhere, VITALIY F. BOBAK and ANDREY A. BALUN did
 3 knowingly conduct and attempt to conduct the financial transactions listed below
 4 affecting interstate and foreign commerce which involved the proceeds of a specified
 5 unlawful activity, that is, Conspiracy to Commit Interstate Transportation of Stolen
 6 Property, in violation of Title 18, United States Code, Sections 371, as charged in Count
 7 1, and Interstate Transportation of Stolen Property, in violation of Title 18, United States
 8 Code, Sections 2314 and 2, as charged in Count 2, knowing the transactions were
 9 designed in whole and in part to conceal and disguise the nature, location, source,
 10 ownership, and control of the proceeds of said specified unlawful activity, and knowing
 11 that the property involved in the financial transactions represented the proceeds of some
 12 form of unlawful activity. Each of the following offenses was committed in furtherance
 13 of, and was a foreseeable part of, the conspiracy charged in Count 1 of this Indictment:

Count	Monetary Transaction
4	January 24, 2022 purchase of \$100,000 Cashier's Check 0114536486, payable to MBA Trading LLC, with funds from Bank of America account ending x3197, held by Vitaliy Bobak and N.B.
5	January 24, 2022 deposit of \$100,000 Cashier's Check 0114536486 into MBA Trading LLC's Sound Credit Union account ending x0518.
6	January 24, 2022 bank transfer of \$90,173 from MBA Trading LLC's Sound Credit Union account ending x0518 to MBA Trading LLC's Sound Credit Union account ending x6436.

23 All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 2.

24 **COUNTS 7-11**

25 **(Money Laundering– 1957)**

26 56. The allegations set forth in the foregoing paragraphs are re-alleged and
 27 incorporated as if fully set forth herein.

57. On or about the dates set forth below, in the Western District of Washington and elsewhere, defendants VITALIY F. BOBAK and ANDREY A. BALUN, knowing that the funds involved represented proceeds of some form of unlawful activity, engaged in, attempted to engage in, and aided and abetted the engaging in the following monetary transactions by, through, or to one or more financial institutions, in and affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from specified unlawful activity, that is, Conspiracy to Commit Interstate Transportation of Stolen Property, in violation of Title 18, United States Code, Sections 371, as charged in Count 1, and Interstate Transportation of Stolen Property, in violation of Title 18, United States Code, Sections 2314 and 2, as charged in Counts 2.

Count	Monetary Transaction
7	March 12, 2022 purchase of Cashier's Check 010030351210, in the amount of \$33,452.83, payable to business R.R., with funds from Medicus LLC's Sound Credit Union account ending in x6253.
8	March 22, 2022 purchase of Cashier's Check 0114536957, in the amount of \$40,000, payable to MBA Trading LLC, with funds from Vitaliy Bobak's Bank of America account ending x2586.
9	April 25, 2022 bank transfer in the amount of \$25,000 from Medicus LLC's Sound Credit Union account ending x6253 to MBA Trading LLC's Sound Credit Union account ending x6436.
10	June 28, 2023 deposit of check 1126, in the amount of \$15,000 and payable to Andrey Balun, to Andrey Balun's US Bank account ending x7802.
11	July 17, 2023 debit card transaction in the amount of \$67,390 using debit card ending x2556 linked to Vitaliy Bobak's JPMorgan Chase account ending x8421, for purchase of 2023 Lexus NX.

All in violation of Title 18, United States Code, Sections 1957(a) and 2.

FORFEITURE ALLEGATION

The allegations contained in Counts 1 - 11 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

Upon conviction of an offense alleged in Counts 1 and 2, VITALIY F. BOBAK and ANDREY A. BALUN shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), by way of Title 28, United States Code, Section 2461(c), any property that constitutes or is traceable to proceeds of the offense. This property includes, but is not limited to:

- a. A 2023 gray Lexus NX SUV, VIN 2T2HKCEZ1PC014443, seized from Burien, Washington, on or about December 19, 2023;
- b. Approximately \$46,069.20 in funds seized from Amazon merchant account "Medikus," Customer ID: 44847330805, held in the name of Andrey Balun;
- c. Approximately 74,000 items of stolen merchandise seized from a Burien, Washington storefront and adjacent warehouse, on or about December 19, 2023; and
- d. A sum of money reflecting the proceeds the defendant obtained from the offense.

Upon conviction of any of the offenses alleged in Counts 4 - 11, VITALIY F. BOBAK and ANDREY A. BALUN shall forfeit to the United States any property involved in the offense. All such property is forfeitable pursuant to Title 18, United States Code, Section 982(a)(1). This property includes, but is not limited to:

- a. A 2023 gray Lexus SUV, VIN 2T2HKCEZ1PC014443, seized from Burien, Washington, on or about December 19, 2023;
- b. Approximately \$46,069.20 in funds seized from Amazon merchant account "Medikus," Customer ID: 44847330805, held in the name of Andrey Balun;

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

- c. Approximately 74,000 items of stolen merchandise seized from a Burien, Washington storefront and adjacent warehouse, on or about December 19, 2023; and
- d. A sum of money reflecting the proceeds the defendant obtained from the offense.

//
//

1 **Substitute Assets.** If any of the above-described forfeitable property, as a result of
2 any act or omission of the defendant,

- 3 a. cannot be located upon the exercise of due diligence;
- 4 b. has been transferred or sold to, or deposited with, a third party;
- 5 c. has been placed beyond the jurisdiction of the Court;
- 6 d. has been substantially diminished in value; or,
- 7 e. has been commingled with other property which cannot be divided
without difficulty,

8 it is the intent of the United States to seek the forfeiture of any other property of the
9 defendant, up to the value of the above-described forfeitable property, pursuant to
10 Title 21, United States Code, Section 853(p).

12 A TRUE BILL: *yes*

13 DATED: *7.10.2024*

14
15 *Signature of Foreperson redacted pursuant*
16 *to the policy of the Judicial Conference of*
the United States.

17 _____
18 FOREPERSON

18 
19 _____
19 TESSA M. GORMAN
20 United States Attorney

21 
22 _____
22 SETH WILKINSON
23 Assistant United States Attorney

24 
25 _____
25 SEAN H. WAITE
26 Assistant United States Attorney