

U.S. DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
2014 JUL -9 AM 9:20

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

UNITED STATES OF AMERICA)
)
V.)
)
VIACHESLAV ZHUKOV)
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)
)

SUPERSEDING INDICTMENT)
CASE NO. CR414-196)
VIO: 50 U.S.C. §§ 1701-1706)
Conspiracy to Violate)
International Emergency)
Economic Powers Act)
18 U.S.C. § 1001)
False Statements)

THE GRAND JURY CHARGES THAT:

COUNT ONE

Conspiracy to Violate International Emergency Economic Powers Act
50 U.S.C. § 1705

Beginning sometime in May 2014 and continuing through June 2014, the exact dates being unknown to the grand jury, in Chatham County, within the Southern District of Georgia, and elsewhere, **Defendant Viacheslav Zhukov** and others known and unknown to the grand jury, did knowingly and willfully combine, conspire, confederate and agree together and with each other to commit offenses against the United States, that is, the International Emergency Economic Powers Act and the Export Administration Regulations, in violation of Title 50, United States Code, Sections 1701 through 1706 and Title 15, Code of Federal Regulations, Sections 730 through 774 and Title 18, United States Code, Section 2.

OBJECT OF THE CONSPIRACY

The object of the conspiracy was for **Defendant Viacheslav Zhukov** and others known and unknown to the grand jury to unlawfully export controlled firearm accessories from the United States to co-conspirators in Russia without obtaining an export license from the United States Department of Commerce.

OVERT ACTS

In furtherance of the conspiracy, and to effect the objects thereof, **Defendant Viacheslav Zhukov** committed the following overt acts, among others:

1. On or about May 21, 2014, **Defendant Viacheslav Zhukov** received a package of EOTech G33-STS magnifier scopes at his home in Chatham County from United States Company A. EOTech G33-STS magnifier scopes are controlled under the Export Administration Regulations for crime control purposes and require a license from the Department of Commerce to export to almost all countries, including Russia.

2. On or about May 21, 2014, **Defendant Viacheslav Zhukov** mailed a package containing EOTech G33-STS magnifier scopes to Russia without an export license and misrepresented the contents of the package on the United States Postal Service Customs Declaration form to the United States Postal Service.

3. On or about May 23, 2014, **Defendant Viacheslav Zhukov** mailed a second package containing EOTech G33-STS magnifier scopes without a license to Russia and misrepresented the contents of the package on the United States Postal Service Customs Declaration form to the United States Postal Service.

4. On or about June 4, 2014, **Defendant Viacheslav Zhukov** mailed a third package containing EOTech G33-STS magnifier scopes without a license to Russia and misrepresented the contents of the package on the United States Postal Service Customs Declaration form to the United States Postal Service.

All done in violation of Title 50, United States Code, Sections 1701 through 1706, Title 15, Code of Federal Regulations, Section 742.7 and Title 18, United States Code, Section 2.

COUNT TWO

False Statements

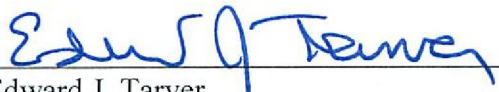
18 U.S.C. § 1001(a)(3)

On or about June 2, 2014, in Chatham County, within the Southern District of Georgia, in a matter within the jurisdiction of the United States Postal Service, an independent establishment within the executive branch of the United States Government, the **Defendant Viacheslav Zhukov** did willfully and knowingly make and cause to be made, and use and cause to be used, a false writing or document, knowing the same to contain a materially false, fictitious, and fraudulent statement. **Defendant Viacheslav Zhukov** submitted a false United States Postal Service Customs Declaration form to the United States Postal Service by falsely listing that a package he was mailing to Russia only contained a cardboard box, a model battle tank and men's jeans. However, the package contained various firearm accessories to be mailed to Russia and **Defendant Viacheslav Zhukov** did in fact know and believe that the package contained the various firearm accessories.

All in violation of Title 18, United States Code, Section 1001(a)(3).

A True Bill.

Foreperson




Edward J. Tarver
United States Attorney



James D. Durham
First Assistant United States Attorney



Brian T. Rafferty
Assistant United States Attorney
Chief, Criminal Division



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