

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 8:24 cr 40 SDM - JSS
18 U.S.C. § 1960(b)(1)(B) & (C)
18 U.S.C. § 1956(h)

ROMAN BOSS
a/k/a Roman Pikulev
a/k/a Роман Пикулев

SEALED

INDICTMENT

The Grand Jury charges:

JAN 25 2024 PM 1:49
FILED - USDC - FL MD - TPA

COUNT ONE
(Operating an Unlicensed Money Transmitting Business)

At times material to this Indictment:

A. Introduction

1. ROMAN BOSS was a Russian national living outside of the United States. From as early as in or around fall 2014, through at least March 9, 2023, BOSS, and others known and unknown, established, controlled, managed, supervised, directed, and owned a money transmitting business (known as Cryptonator) that operated as an over-the-counter trader and made a profit by converting virtual currency and, at times, fiat currency, for U.S.-based customers, without first obtaining a license to do so.

2. The operation of Cryptonator involved an international money laundering scheme that, by virtue of its business model, catered to criminals. Cryptonator facilitated crimes, including, but not limited to, computer hacking,

ransomware, fraud, and identity theft. Since its founding, Cryptonator received criminal proceeds of, among other crimes, numerous computer intrusions and hacking incidents, ransomware scams, various fraud markets, and identity theft schemes.

3. Federal law required money transmitting businesses doing business wholly or in substantial part in the United States to be registered with the Financial Crimes Enforcement Network (“FinCEN”). The failure to register with FinCEN was a federal felony offense. Despite doing substantial business in the United States, Cryptonator was not registered with FinCEN as a money transmitting business. Cryptonator had no meaningful anti-money laundering processes in place and lacked an effective anti-money laundering program.

B. The Scheme

4. Beginning on an unknown date, but at least as early as December 2018, and continuing until at least on or about March 9, 2023, in the Middle District of Florida and elsewhere, the defendant,

ROMAN BOSS
a/k/a Роман Пикулев,

knowingly conducted, controlled, managed, supervised, directed, and owned an unlicensed money transmitting business, as that term is defined in 18 U.S.C.

§ 1960(b)(1), affecting interstate and foreign commerce, i.e., Cryptonator, which:

- a. failed to comply with the money transmitting business

registration requirements under 31 U.S.C. § 5330, and the regulations prescribed thereunder; and

b. involved the transportation or transmission of funds that were known to the defendant to have been derived from a criminal offense or were intended to be used to promote or support unlawful activity.

In violation of 18 U.S.C. §§ 1960(b)(1)(B), 1960(b)(1)(C), & 2.

COUNT TWO
(Conspiracy to Commit Money Laundering)

A. Introduction

1. Part A (Introduction) of Count One of this Indictment is hereby realleged and incorporated by reference as though fully set forth herein.

B. The Conspiracy

2. Beginning on an unknown date, but at least as early as in or around December 2018, and continuing until at least on or about March 9, 2023, in the Middle District of Florida and elsewhere, the defendant,

ROMAN BOSS
a/k/a Роман Пикулев,

did knowingly and willfully combine, conspire, and agree with other persons, both known and unknown to the Grand Jury, to commit money laundering, that is, knowing that the property involved in a financial transaction represented the proceeds of some form of unlawful activity, did conduct and attempt to conduct a financial transaction, which in fact involved the proceeds of specified unlawful

activity, that is, wire fraud, in violation of 18 U.S.C. § 1343, knowing that the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(B)(i).

C. Manner and Means

3. The manner and means by which the conspirators sought to accomplish the object of the conspiracy included, among others, the following:

a. It was a part of the conspiracy that the defendant would and did develop, and commission the development of, a virtual currency exchange and payment system called Cryptonator;

b. It was further part of the conspiracy the defendant would and did develop accounts for individual user and merchant user conspirators. Individual users could use the exchange system to exchange one virtual currency for another and, at times, exchange virtual currency for fiat currency. Merchant users could use the payment system to accept virtual currency payments through the merchant users' own website, and withdraw the proceeds in fiat currency and/or virtual currency;

c. It was further part of the conspiracy that the defendant would and did develop Cryptonator so as to, among other things, assist individual user conspirators—including individual user conspirators in the Middle District of Florida—in transacting between virtual currencies, and between fiat and virtual currencies, without requiring individual users to provide any documentation about

their identities or to substantiate their identities via standard know-your-customer protocols;

d. It was further part of the conspiracy that the defendant would and did develop Cryptonator so as to, among other things, assist individual user conspirators in concealing the source of the funds the individual user conspirators sought to exchange on Cryptonator, including by anonymizing the source of the transactions and allowing users to exchange privacy tokens;

e. It was further part of the conspiracy that the defendant would and did develop Cryptonator so as to, among other things, allow merchant user conspirators—including merchant user conspirators in the Middle District of Florida—to process virtual currency payments on the merchant users' sites without any due diligence regarding the services provided by the merchant users and without requiring any authentication documents from the merchant users;

f. It was further part of the conspiracy that the defendant would and did authorize merchant user conspirators to use Cryptonator to accept payments on their sites irrespective of the type of business the merchant user conducted, and would and did process thousands of transactions for merchant users engaged in a variety of fraud schemes;

g. It was further part of the conspiracy that the defendant would and did use a web-based communication system located in the United States (“U.S.-

based Web Communication System 1”) to facilitate his operation and administration of Cryptonator;

h. It was further part of the conspiracy that the defendant would and did use U.S.-based Web Communication System 1, as well as email communication methods, to provide customer support services to Cryptonator individual user and merchant user conspirators;

i. It was further part of the conspiracy that the defendant would and did promote Cryptonator to attract new individual user and merchant user conspirators, including through a U.S.-based social media site;

j. It was further part of the conspiracy that, in order to ensure Cryptonator could complete individual user and merchant user virtual currency exchange requests, the defendant would and did at times exchange virtual currencies Cryptonator possessed using third-party virtual currency exchanges, including a U.S.-based virtual currency exchange;

k. It was further part of the conspiracy that the defendant would and did earn a commission from all transactions individual user and merchant user conspirators completed on Cryptonator, including transactions completed by individual users and merchant users in and/or from the United States;

l. It was further part of the conspiracy that the defendant would and did earn a commission from all transactions individual user and merchant user

conspirators completed on Cryptonator, including transactions that represented proceeds from a variety of fraud schemes;

m. It was further part of the conspiracy that the defendant would and did conduct individual user and merchant user conspirator transactions in a manner designed to conceal and disguise the identities of the individual users and merchant users, and the source of the original proceeds, including by using unhosted wallet addresses to conduct the transactions, failing to collect identity information regarding the source and/or destination of the transactions; and allowing users to exchange privacy tokens; and

n. It was further part of the conspiracy that conspirators would and did perform acts and make statements to misrepresent, hide, and conceal, and cause to be misrepresented, hidden, and concealed, the purpose of the conspiracy and the acts committed in furtherance thereof.

All in violation of 18 U.S.C. § 1956(h).

FORFEITURE

1. The allegations contained in Counts One and Two of this Indictment are incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 982(a)(1).

2. Upon conviction of a violation of 18 U.S.C. §§ 1956(h) and/or 1960, the defendant,

ROMAN BOSS

а/к/а Роман Пикулев,

shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in the offenses, or any property traceable to such property.

3. If any of the property described above, as a result of any act or omission of the defendant:

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


the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1).

A TRUE BILL,


Foreperson

ROGER B. HANDBERG
United States Attorney


NICOLE M. ARGENTIERI
Acting Assistant Attorney General,
Criminal Division

By: 
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JOHN T. LYNCH, JR.
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Cryptocurrency Enforcement Team
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By: 
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U.S. Department of Justice,
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Computer Crime & Intellectual
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National Cryptocurrency
Enforcement Team

FORM OBD-34
January 24

No.

UNITED STATES DISTRICT COURT
Middle District of Florida
Tampa Division

THE UNITED STATES OF AMERICA

vs.

ROMAN BOSS

INDICTMENT

Violations: 18 U.S.C. § 1960(b)(1)(B), 1960(b)(1)(C), & 2.
18 U.S.C. § 1956(h)

A true bill,

-
Foreperson

Filed in open court this 25th day of January, 2024.



Clerk

Bail \$ _____
