

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	No.
v.)	
)	Violations: Title 18, United States
ALEXANDER IGOLNIKOV,)	Code, Sections 371, 2314, and 2315
a/k/a Alexandr Igolnikov,)	
a/k/a Aleksandr Igolnikov,)	<u>Under Seal</u>
a/k/a "Alex")	

COUNT ONE

The SPECIAL MARCH 2013 GRAND JURY charges:

1. At times material to the indictment:

a. Defendant ALEXANDER IGOLNIKOV was the owner and president of Seven Amigos Used Cars Incorporated and the vice president of Chicago Elite Cab Corporation.

b. Chicago Elite Cab Corporation, which was located in Chicago, Illinois, operated taxicabs under City of Chicago taxi medallions, which were managed by Chicago Elite Cab Corporation and related entities that were affiliated with Chicago Carriage Taxi Company, which had a business location near 26th and Wabash in Chicago, Illinois.

c. Seven Amigos Used Cars was an auto broker located in Chicago, Illinois, which, at times, did business at the same address as Chicago Carriage Taxi Company.

d. Individual A was the owner of Auto Broker A, which was an auto brokerage business located in Indiana.

e. Individual B was the owner of Auto Broker B, which was an auto brokerage business located in Indiana.

f. Individual C was the owner of Auto Broker C, which was an auto brokerage business located in Illinois.

g. Officer A and Officer B were employed as law enforcement officers in the State of Indiana.

h. Company A and Company C were Illinois corporations that leased vehicles from other entities to operate them as taxicabs in Chicago, Illinois.

i. Company B was an auto sales company located in Indiana.

j. The Indiana Bureau of Motor Vehicles, headquartered in Indianapolis, Indiana, was the Indiana agency responsible for issuing official Indiana motor vehicle certificates of title.

k. The Illinois Secretary of State, headquartered in Springfield, Illinois, was the Illinois agency responsible for issuing official Illinois motor vehicle certificates of title.

l. According to the laws of Indiana and Illinois, a motor vehicle certificate of title is an official document that includes information such as the names of the purchaser and seller, the make and body type of the vehicle, and the Vehicle Identification Number.

m. In Illinois and Indiana, vehicles that had sustained significant damage were issued a title with a “salvage” brand.

n. Under Illinois and Indiana law, there was no legal mechanism for a vehicle that had previously been issued a salvage title to be issued a “clean” Indiana or Illinois title, which is a title without any reference to the salvage history of the vehicle.

o. Under Indiana law, a vehicle that had been issued a salvage title could be repaired and issued a title with a “rebuilt” brand if the vehicle was examined by a law enforcement officer of the state of Indiana and the officer filled out an Affidavit of Restoration for a Salvage Motor Vehicle, in which the officer certified that the vehicle had been repaired such that the salvage restoration of the vehicle conformed to Indiana Code § 9-22-3.

p. Under Indiana Bureau of Motor Vehicle procedures, an individual or entity could apply for a clean title for a vehicle by submitting paperwork stating that the vehicle had been purchased from a tow yard after it had been abandoned or left unclaimed after being towed to the yard. Such paperwork had to include an Affidavit of Police Officer, Physical Inspection of an Indiana Resident’s Vehicle form, on which an Indiana law enforcement officer certified that the officer had personally examined the vehicle and verified the Vehicle Identification Number and other information about the vehicle, such as the year, make, and type.

q. According to Rule 2.01 of the City of Chicago Medallion Owner Rules, no vehicle that had been issued the title class of either “salvage” or “rebuilt” in any jurisdiction would be approved for use as a taxicab in Chicago.

2. Beginning no later than in or about 2007, and continuing until in or about April 2010, at Chicago, in the Northern District of Illinois, and elsewhere,

ALEXANDER IGOLNIKOV, a/k/a Alexandr Igolnikov,
a/k/a Aleksandr Igolnikov, a/k/a “Alex,”

defendant herein, did conspire with Individual A, Individual B, Individual C, and others known and unknown to the Grand Jury, to:

(a) with unlawful and fraudulent intent, transport in interstate commerce any falsely made, forged, altered, and counterfeited security, knowing the security to have been falsely made, forged, altered, and counterfeited, in violation of Title 18, United States Code, Section 2314; and

(b) receive and possess any falsely made, forged, altered, and counterfeited security, moving as, and which are a part of, and which constitute interstate commerce, knowing the security to have been so falsely made, forged, altered, and counterfeited, in violation of Title 18, United States Code, Section 2315.

Manner and Means of the Conspiracy

3. It was part of the conspiracy that defendant IGOLNIKOV agreed with Individual A, Individual B, Individual C, and others to purchase vehicles with salvage titles from online auction sites, fraudulently obtain clean and rebuilt

Indiana titles for those vehicles by submitting false paperwork to the Indiana Bureau of Motor Vehicles, and then used those clean and rebuilt Indiana titles to obtain clean Illinois titles, thus concealing that the vehicles were previously issued salvage titles.

4. It was further part of the conspiracy that defendant IGOLNIKOV purchased damaged vehicles with salvage titles from online auto auctions sites using accounts in the name of Seven Amigos Used Cars.

5. It was further part of the conspiracy that defendant IGOLNIKOV agreed to purchase salvage vehicles from Individual A, Individual B, and Individual C after they purchased damaged vehicles with salvage titles from online auto auction sites using their own online auto auction accounts.

6. It was further part of the conspiracy that defendant IGOLNIKOV agreed with Individual A, Individual B, and Individual C in many instances to have the damaged vehicles with salvage titles towed from the online auction sites' yards in out-of-state locations to the business address for Chicago Carriage Taxi Company, which was also used by Seven Amigos Used Cars, in Chicago, Illinois.

7. It was further part of the conspiracy that defendant IGOLNIKOV often had the damaged vehicles repaired at the business address for Chicago Carriage Taxi Company. At times, Individual A, Individual B, and others repaired the vehicle before delivering it to defendant IGOLNIKOV.

8. It was further part of the conspiracy that Individual A, Individual B, Individual C, and others submitted applications for clean titles to the Indiana

Bureau of Motor Vehicles, in the names of Auto Broker A, Auto Broker B, and others, supported by: (1) false paperwork claiming that a vehicle had been purchased from a tow yard after it had been abandoned and left unclaimed after being towed to the yard, when defendant IGOLNIKOV, Individual A, Individual B, and Individual C knew that the vehicle had been purchased in a damaged condition with a salvage title from an online auction site; and (2) an “Affidavit of Police Officer, Physical Inspection of an Indiana Resident’s Vehicle” form, on which an Indiana law enforcement officer purportedly certified that the officer had personally examined the vehicle and verified the Vehicle Identification Number and other information about the vehicle, such as the year, make, and type when, in reality, no officer had examined the vehicle, and the Affidavit of Police Officer had been signed by Officer A, for a fee, Officer B, or other individuals without any inspection of the vehicle.

9. It was further part of the conspiracy that, based on the false towing paperwork and false Affidavits of Police Officer, the Indiana Bureau of Motor Vehicles issued clean titles to Auto Broker A, Auto Broker B, Auto Broker C, and others for vehicles that had previously been issued salvage titles.

10. It was further part of the conspiracy that Individual A, Individual B, Individual C, and others submitted applications for rebuilt titles to the Indiana Bureau of Motor Vehicles, in the names of Auto Broker A, Auto Broker B, Auto Broker C, and others, supported by false Affidavits of Restoration for a Salvage Motor Vehicle, in which an Indiana law enforcement officer purportedly certified

that the officer had examined the vehicle and that the vehicle had been repaired such that the salvage restoration of the vehicle conformed with Indiana law when, in reality, no officer had examined the vehicle, and the Affidavit of Police Officer had been signed by Officer A, for a fee, Officer B, or other individuals without any inspection of the vehicle.

11. It was further part of the conspiracy that, based on the false Affidavits of Restoration for a Salvage Motor Vehicle, the Indiana Bureau of Motor Vehicles issued rebuilt titles to Auto Broker A, Auto Broker B, Auto Broker C, and others for vehicles that had previously been issued salvage titles.

12. It was further part of the conspiracy that Individual A, Individual B, and Individual C often placed a sticker, usually one purporting to be from an online auction, over the rebuilt brand on the Indiana title to conceal the fact that the title had a rebuilt brand.

13. It was further part of the conspiracy that Individual A caused the Indiana Bureau of Motor Vehicles to mail the clean and rebuilt Indiana titles from Indiana to a business address for Auto Broker A in the Northern District of Illinois.

14. It was further part of the conspiracy that Individual B caused the Indiana Bureau of Motor Vehicles to mail the clean and rebuilt Indiana titles from Indiana to business addresses for Auto Broker B in the Northern District of Illinois.

15. It was further part of the conspiracy that Individual C caused the Indiana Bureau of Motor Vehicles to mail the clean and rebuilt Indiana titles from Indiana to a business address for Auto Broker C in the Northern District of Illinois.

16. It was further part of the conspiracy that Individual A, Individual B, and Individual C purchased blank, but signed, Affidavits of Restoration for a Salvage Motor Vehicle and Affidavits of Police Officer, from Officer A for approximately \$5 to \$20 each, to be used in support of the applications to fraudulently obtain clean and rebuilt titles from the Indiana Bureau of Motor Vehicles.

17. It was further part of the conspiracy that, after obtaining either a clean or rebuilt title for the vehicles that had previously been issued salvage titles, Individual A, Individual B, and Individual C sold the vehicles to defendant IGOLNIKOV, who purchased them in the names of Seven Amigos Used Cars, Chicago Elite Cab Corporation, and other related business entities and who paid Individual A, Individual B, and Individual C a premium above the purchase price of the vehicle in exchange for their work in obtaining the clean and rebuilt Indiana titles.

18. It was further part of the conspiracy that defendant IGOLNIKOV and his business associates used the clean Indiana titles and the rebuilt Indiana titles on which the rebuilt brand had been obscured by a sticker to apply to the Illinois Secretary of State for a clean Illinois title for the vehicles.

19. It was further part of the conspiracy that defendant IGOLNIKOV and his business associates had these vehicles, which had previously been issued salvage titles, operate as taxicabs in Chicago, Illinois, by concealing from the City of Chicago that the vehicles had previously been issued salvage and rebuilt titles.

20. It was further part of the conspiracy that defendant IGOLNIKOV and his co-conspirators concealed, misrepresented, and hid and caused to be concealed, misrepresented, and hidden, the existence and purpose of the conspiracy and the acts done in furtherance of the conspiracy.

21. As a result of the conspiracy, by the above means, defendant IGOLNIKOV caused at least approximately 180 vehicles to illegally obtain clean titles from Indiana and Illinois and, as a result, to illegally operate as licensed and registered taxicabs in Chicago, Illinois.

Overt Acts

22. In furtherance of the conspiracy and to effect the objects of the conspiracy, defendant ALEXANDER IGOLNIKOV and his co-conspirators committed and caused to be committed the following overt acts, among others, in the Northern District of Illinois, and elsewhere:

(a) On or about September 8, 2009, Individual B, using an account in the name of Auto Broker B, purchased a vehicle with Vehicle Identification Number 2FAFP71F38X130916 through an auto auction for \$4,915.

(b) On or about September 11, 2009, Individual B, in the name of Auto Broker B, applied to the Indiana Bureau of Motor Vehicles for a rebuilt title for the vehicle with a Vehicle Identification Number ending in -916 and, in support of the title application, submitted an Affidavit of Restoration for a Salvage Motor Vehicle signed by Officer A.

(c) On or about September 17, 2009, the Indiana Bureau of Motor Vehicles issued a rebuilt Certificate of Title for the vehicle with a Vehicle Identification Number ending in -916 to Auto Broker B and mailed the title from Indiana to Auto Broker B at an address in the Northern District of Illinois.

(d) Between on or about September 17, 2009, and October 4, 2009, Auto Broker B sold the vehicle with a Vehicle Identification Number ending in -916 to Seven Amigos Used Cars, and defendant IGOLNIKOV signed the Indiana title for Seven Amigos Used Cars as the purchaser of the vehicle with a Vehicle Identification Number ending in -916.

(e) On or about October 4, 2009, Seven Amigos Used Cars sold the vehicle with a Vehicle Identification Number ending in -916 to Chicago Elite Cab Corporation, and defendant IGOLNIKOV signed for Chicago Elite Cab Corporation as the purchaser of the vehicle with a Vehicle Identification Number ending in -916.

(f) On or about October 12, 2009, Chicago Elite Cab Corporation entered into a lease agreement with Company A for Company A to lease the vehicle with a Vehicle Identification Number ending in -916 from Chicago Elite Cab Corporation for \$1 per year and for Company A to use the vehicle with a Vehicle Identification Number ending in -916 as a Chicago taxicab; defendant IGOLNIKOV signed for both Chicago Elite Cab Corporation and Company A on the vehicle lease paperwork.

(g) Between on or about September 17, 2009, and October 15, 2009, a sticker was placed over the rebuilt brand on the Indiana title for the vehicle with a Vehicle Identification Number ending in -916.

(h) On or about October 15, 2009, defendant IGOLNIKOV, on behalf of Chicago Elite Cab Corporation, applied to the Illinois Secretary of State for a clean title for the vehicle with a Vehicle Identification Number ending in -916.

(i) On or about October 22, 2009, defendant IGOLNOKOV, using an account in the name of Seven Amigos Used Cars, purchased a vehicle with Vehicle Identification Number 2FAFP71V98X176167 through an auto auction for \$4,300.

(j) On or about November 30, 2009, Company B applied to the Indiana Bureau of Motor Vehicles for a clean title for the vehicle with a Vehicle Identification Number ending in -167 and, in support of the title application, submitted: (1) an Illinois Secretary of State Certificate of Purchase form, stating that the vehicle with a Vehicle Identification Number ending in -167 was purchased by Seven Amigos Used Cars for \$4,300 at a “public sale” on October 7, 2009 and was towed from an address in Chicago, Illinois to Tow Company A, at an address in Robbins, Illinois; and (2) an Affidavit of Police Officer signed by Officer B, stating that Officer B had inspected the vehicle with a Vehicle Identification Number ending in -167 and verified the Vehicle Identification Number.

(k) On or about December 2, 2009, the Indiana Bureau of Motor Vehicles issued a clean Indiana title for the vehicle with a Vehicle Identification

Number ending in -167 to Company B and mailed the title from Indiana to Company B at an address in the Northern District of Illinois.

(l) On or about December 14, 2009, Company B sold the vehicle with a Vehicle Identification Number ending in -167 to Seven Amigos Used Cars, and defendant IGOLNIKOV signed as the purchaser.

(m) On or about December 22, 2009, Seven Amigos Used Cars sold the vehicle with a Vehicle Identification Number ending in -167 to Chicago Elite Cab Corporation and defendant IGOLNIKOV signed for both companies as the seller and the purchaser.

(n) On or about December 28, 2009, Chicago Elite Cab Corporation entered into a lease agreement with Company C for Company C to lease the vehicle with a Vehicle Identification Number ending in -167 from Chicago Elite Cab Corporation for \$1 per year and for Company C to use the vehicle with a Vehicle Identification Number ending in -167 as a Chicago taxicab; defendant IGOLNIKOV signed for both Chicago Elite Cab Corporation and Company C on the vehicle lease paperwork;

(o) On or about January 4, 2010, defendant IGOLNIKOV, on behalf of Chicago Elite Cab Corporation, applied to the Illinois Secretary of State for a clean title for the vehicle with a Vehicle Identification Number ending in -167.

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

COUNT TWO

The SPECIAL MARCH 2013 GRAND JURY further charges:

1. Paragraph 1 of Count One of this indictment is incorporated here.
2. Beginning no later than on or about September 11, 2009, and continuing until on or about October 12, 2009, at Chicago, in the Northern District of Illinois, and elsewhere,

ALEXANDER IGOLNIKOV, a/k/a Alexandr Igolnikov, a/k/a “Alex,”
defendant herein, with unlawful and fraudulent intent, transported and caused to be transported in interstate commerce a falsely made, forged, altered, and counterfeited security, namely the title for a vehicle with Vehicle Identification Number 2FAFP71F38X130916, knowing the security to have been falsely made, forged, altered, and counterfeited;

In violation of Title 18, United States Code, Section 2314.

COUNT THREE

The SPECIAL MARCH 2013 GRAND JURY further charges:

1. Paragraph 1 of Count One of this indictment is incorporated here.
2. Beginning no later than on or about September 17, 2009, and continuing until on or about October 12, 2009, at Chicago, in the Northern District of Illinois, and elsewhere,

ALEXANDER IGOLNIKOV, a/k/a Alexandr Igolnikov, a/k/a "Alex," defendant herein, received and possessed a falsely made, forged, altered, and counterfeited security, namely, the title for a vehicle with Vehicle Identification Number 2FAFP71F38X130916, moving as, and which was a part of, and which constituted interstate commerce, knowing the security to have been so falsely made, forged, altered, and counterfeited;

In violation of Title 18, United States Code, Section 2315.

COUNT FOUR

The SPECIAL MARCH 2013 GRAND JURY further charges:

1. Paragraph 1 of Count One of this indictment is incorporated here.
2. Beginning no later than on or about November 30, 2009, and continuing until at least on or about December 28, 2009, at Chicago, in the Northern District of Illinois, and elsewhere,

ALEXANDER IGOLNIKOV, a/k/a Alexandr Igolnikov, a/k/a “Alex,”
defendant herein, with unlawful and fraudulent intent, transported and caused to be transported in interstate commerce a falsely made, forged, altered, and counterfeited security, namely the title for a vehicle with Vehicle Identification Number 2FAFP71V98X176167, knowing the security to have been falsely made, forged, altered, and counterfeited;

in violation of Title 18, United States Code, Section 2314.

COUNT FIVE

The SPECIAL MARCH 2013 GRAND JURY further charges:

1. Paragraph 1 of Count One of this indictment is incorporated here.
2. Beginning no later than on or about December 14, 2009, and continuing until at least on or about December 28, 2009, at Chicago, in the Northern District of Illinois, and elsewhere,

ALEXANDER IGOLNIKOV, a/k/a Alexandr Igolnikov, a/k/a "Alex," defendant herein, received and possessed a falsely made, forged, altered, and counterfeited security, namely, the title for a vehicle with Vehicle Identification Number 2FAFP71V98X176167, moving as, and which was a part of, and which constituted interstate commerce, knowing the security to have been so falsely made, forged, altered, and counterfeited;

In violation of Title 18, United States Code, Section 2315.

FORFEITURE ALLEGATION

The SPECIAL MARCH 2013 GRAND JURY alleges:

1. The allegations contained in this indictment are incorporated here for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. As a result of the violations of Title 18, United States Code, Sections 371, 2314, and 2315, as alleged in Counts One through Five of this indictment,

ALEXANDER IGOLNIKOV, a/k/a Alexandr Igolnikov, a/k/a "Alex,"

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any and all right title and interest he may have in any property, real and personal, which constitutes and is derived from proceeds traceable to the charged offenses.

3. If any of the forfeitable property described above, as a result of any act or omission by 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 of America shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY