

PW:TD
F.#2007R00950

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X
UNITED STATES OF AMERICA

- against -

ROSS, J.

I N D I C T M E N T

CR 07 207
Cr. No. **07 207**

(18 U.S.C., §§ 1029(b)(2),
1029(c)(1)(A)(ii), 1956(h)
and 3551 et seq.)

ROMAN VEGA,
also known as "Boa,"
"Roman Stepanenko,"
"Randy Riolta" and
ICQ User No. 107711,

MATSUMOTO, M.J.

Defendant.

----- X

THE GRAND JURY CHARGES:

FILED
BY CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.
★ SEP 18 2007 ★
BROOKLYN OFFICE

COUNT ONE
(Conspiracy To Commit Access Device Fraud)

1. On or about and between October 2002 and February 26, 2003, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ROMAN VEGA, also known as "Boa," "Roman Stepanenko," "Randy Riolta" and ICQ User No. 107711, together with others, did knowingly and with intent to defraud conspire to effect transactions with one or more access devices issued to another person or persons, to wit: credit card account numbers and the sub-components thereof, including bank identification numbers and credit verification codes, to receive payments or other things of value during a one-year period, the aggregate value of which was equal to or greater than \$1,000, in a manner affecting interstate

commerce, in violation of Title 18, United States Code, Section 1029(a)(5).

2. In furtherance of the conspiracy, and to effect the objectives thereof, within the Eastern District of New York and elsewhere, the defendant ROMAN VEGA, also known as "Boa," "Roman Stepanenko," "Randy Riolta" and ICQ User No. 107711, together with others, committed and caused the commission of the following:

OVERT ACTS

a. On or about December 9, 2002, the defendant ROMAN VEGA, also known as "Boa," "Roman Stepanenko," "Randy Riolta" and ICQ User No. 107711, e-mailed a coconspirator, whose identity is known to the Grand Jury, records containing the credit card numbers of credit cards issued to approximately 100 individuals, including two individuals residing in Queens, New York.

b. On or about December 27, 2002, in Queens, New York, another coconspirator, whose identity is known to the Grand Jury, submitted \$500 to Western Union for forwarding to the the defendant ROMAN VEGA.

(Title 18, United States Code, Sections 1029(b)(2), 1029(c)(1)(A)(ii) and 3551 et seq.)

COUNT TWO

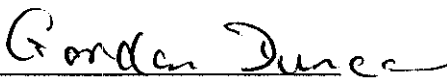
(Conspiracy to Commit Money Laundering)

3. On or about and between October 2002 and February 26, 2003, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ROMAN VEGA, also known as "Boa," "Roman Stepanenko," "Randy Riolta," and ICQ User No. 107711, together with others, did knowingly and intentionally conspire to conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, to wit: movements of funds by wire and involving money instruments, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, and which transfers in fact involved the proceeds of specified unlawful activity, to wit: the proceeds of the conspiracy to commit access device fraud alleged in Count

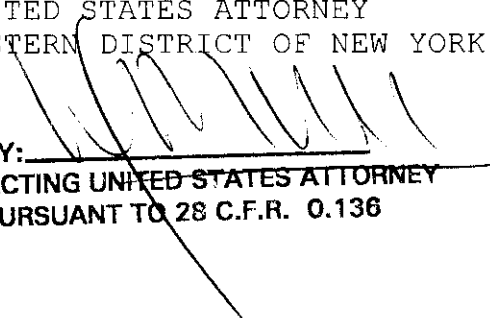
One, with the intent to promote the carrying on of said specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

(Title 18, United States Code, Section 1956(h) and 3551 et seq.)

A TRUE BILL


FOREPERSON

ROSLYNN R. MAUSKOPF
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

BY: 
ACTING UNITED STATES ATTORNEY
PURSUANT TO 28 C.F.R. 0.136

No.

UNITED STATES DISTRICT COURT
Eastern District of New York
Criminal Division

THE UNITED STATES OF AMERICA

vs.

ROMAN VEGA, also known as "Boa,"
"Roman Stepanenko," "Randy Riolta,"
and ICQ User No. 107711

Defendant.

I N D I C T M E N T

T. 18, U.S.C., §§ 1029(b) (2),
1029(c) (1) (A) (ii), 1956(h) and
3551 et seq.

A true bill

For the Dave

Foreman

Filed in open court this _____ day of

_____, A.D. 200__

Clerk

Bail, \$ _____

William Campos, Assistant U.S. Attorney
(718) 254-6292

INFORMATION SHEET

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

CR 07 707

1. Title of Case: United States v. ROMAN VEGA

ROSS, J.

2. Related Magistrate Docket Number(s) _____

M-07-942

MATSUMOTO, M.J.

None ()

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

3. Arrest Date: 8/28/07

* SEP 18 2007 *

BROOKLYN OFFICE

4. Nature of offense(s): Felony
 Misdemeanor

5. Related Civil or Criminal Cases - Title and Docket No(s). (Pursuant to Rule 50.3 of the Local E.D.N.Y. Division of Business Rules): _____

6. Projected Length of Trial: Less than 6 weeks ()
More than 6 weeks ()

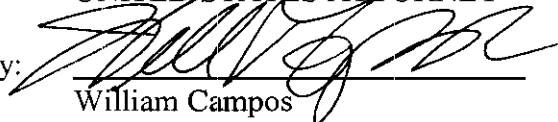
7. County in which crime was allegedly committed: Queens
_____(Pursuant to Rule 50.1(d) of the Local E.D.N.Y. Division of Business Rules)

8. Has this indictment been ordered sealed? () Yes () No

9. Have arrest warrants been ordered? () Yes () No

10. Is a capital count included in the indictment? () Yes () No

ROSLYNN R. MAUSKOPF
UNITED STATES ATTORNEY

By: 

William Campos
Assistant U.S. Attorney
(718) 254-6292