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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Case: 2:25-cr-20664
Assigned To : Parker, Linda V.
Referral Judge: Patti, Anthony P.
Assign. Date : 9/4/2025
Description: IND USA V SEALED MATTER (MRS)

v.

Violation:
18 U.S.C. § 1956(h)

Mykhalio Petrovich Chudnovets,

Defendant.

_____ /

INDICTMENT

THE GRAND JURY CHARGES:

THE DEFENDANT'S SCHEME

1. Between approximately 2011 and 2025, Mykhalio Petrovich Chudnovets operated a money laundering network. Chudnovets worked with financially motivated cybercriminals to transfer criminal proceeds across international borders and to convert criminal proceeds from cryptocurrency into fiat currencies.
2. Originally, Chudnovets offered what appeared to be a personally provided service using individual "money mules." Since approximately 2017, he has offered his services through an online business called e-note.

COUNT ONE

Conspiracy to Commit Money Laundering
18 U.S.C. § 1956(h)

3. Paragraphs 1 through 2 are incorporated by reference.
4. From in and around 2011, to in and around June 2025, in the Eastern District of Michigan and elsewhere, the defendant Mykhalio Petrovich Chudnovets did knowingly combine, conspire, and agree with other persons known and unknown to the Grand Jury to commit offenses in violation of Title 18, United States Code, Section 1956 and Section 1957, to wit:
 - a. to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, wire fraud, in violation of Title 18, United States Code, Section 1343, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, all in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and

- b. to transport, transmit, and transfer, and attempt to transport, transmit, and transfer a monetary instrument or funds involving the proceeds of specified unlawful activity, that is, wire fraud, in violation of Title 18, United States Code, Section 1343, from a place in the United States to or through a place outside the United States, knowing that the funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer 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, all in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i); and
- c. to knowingly engage and attempt to engage, in monetary transactions by, through or to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, that is, transfers of cryptocurrency valued in excess of \$10,000, such property having been derived from a specified unlawful activity, that is, wire fraud, in violation of Title 18, United States Code, Section 1343, all in violation of Title 18, United States Code, Section 1957.

FORFEITURE ALLEGATIONS

Criminal Forfeiture
18 U.S.C. § 982(a)(1)

5. The allegations contained in Count One of this Indictment are incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(1).

6. Pursuant to Title 18, United States Code, Section 982(a)(1), upon conviction of the offense charged in Count 1, in violation of Title 18, United States Code, Section 1956(h), the defendant shall forfeit to the United States any property, real or personal, involved in such offense, and any property traceable to such property.

7. Money Judgment: Upon conviction of violating 18, United States Code, Section 1956(h), defendant shall be ordered to pay the United States a sum of money equal to the total amount involved in such offense.

8. 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 of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

THIS IS A TRUE BILL

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

JEROME F. GORGON JR.
United States Attorney

s/ Thomas Franzinger
THOMAS FRANZINGER
Chief, Organized Crime Unit
Assistant United States Attorney

s/ Timothy J. Wyse
TIMOTHY J. WYSE
Assistant United States Attorney

Dated: September 4, 2025