

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

NO. 3:24-CR-402-L

IANIS ALEKSANDROVICH
ANTROPENKO

FACTUAL RESUME

In support of Ianis Aleksandrovich Antropenko's plea of guilty to the offenses in Counts One and Three of the indictment, Antropenko, the defendant, Andrenette Sullivan, the defendant's attorney, and the United States of America (the government) stipulate and agree to the following:

ELEMENTS OF THE OFFENSE

To prove the offense alleged in Count One of the indictment, charging a violation of 18 U.S.C. § 371, the government must prove each of the following elements beyond a reasonable doubt:¹

- First.* That the defendant and at least one other person agreed to commit the crime of Computer Fraud and Abuse, as charged in the indictment;
- Second.* That the defendant knew the unlawful purpose of the agreement and joined in it willfully, that is, with the intent to further the unlawful purpose; and
- Third.* That at least one of the conspirators during the existence of the conspiracy knowingly committed at least one of the overt acts described in the indictment, in order to accomplish some object or

¹ Fifth Circuit Pattern Jury Instruction 2.15A (5th Cir. 2024).

purpose of the conspiracy.

The elements of Causing Transmission of a Code without Authorization Resulting in Damage to a Protected Computer and Loss to 1 or More Persons during a One-Year Period Aggregating in at least \$5,000 in Value, a violation of 18 U.S.C.

§§ 1030(a)(5)(A), 1030(c)(4)(A)(i)(I), and 1030(c)(4)(B)(i), are as follows:²

- First.* That the defendant or a co-conspirator caused the transmission of a program, information, code, or command, and;
- Second.* As a result, intentionally caused damage, without authorization, to a protected computer, and which;
- Third.* Resulted in loss of at least \$5,000 during 1 year period to one or more persons;

To prove the offense alleged in Count Three of the indictment, charging a violation of 18 U.S.C. § 1956(h), that is, Conspiracy to Commit Money Laundering, the government must prove each of the following elements beyond a reasonable doubt:³

- First.* That the defendant and at least one other person made an agreement to commit the crime of 18 U.S.C. § 1956(a)(1)(B)(i);
- Second.* That the defendant knew the unlawful purpose of the agreement; and
- Third.* That the defendant joined in the agreement willfully, that is, with the intent to further the unlawful purpose.

² See *United States v. Thomas*, 877 F.3d 591 (5th Cir. 2017); Ninth Circuit Model Criminal Jury Instruction 8.100 (9th Cir. 2025).

³ Fifth Circuit Pattern Jury Instruction 2.76C (5th Cir. 2024).

The elements of Money Laundering by Concealment and Disguise, a violation of 18 U.S.C. § 1956(a)(1)(B)(i), are as follows:⁴

- First.* That the defendant knowingly conducted a financial transaction;
- Second.* That the financial transaction involved the proceeds of a specified unlawful activity, namely Computer Fraud and Abuse in violation of 18 U.S.C. §§ 1030(a)(5)(A), 1030(c)(4)(A)(i)(I), and 1030(c)(4)(B)(i);
- Third.* That the defendant knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity; and;
- Fourth.* That the defendant knew that the transaction was designed in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of the specified unlawful activity.

STIPULATED FACTS

1. Ianis Aleksandrovich Antropenko admits and agrees that starting at least on or about May 6, 2018, and continuing through at least on or about August 19, 2022, within the Northern District of Texas, Dallas Division, and elsewhere, he did conspire and agree with other persons known and unknown to the Grand Jury to knowingly cause the transmission of a program, information, code and command, and as a result, intentionally cause damage, without authorization, to a protected computer, and cause loss to 1 or more persons during a one-year period from the defendant's course of conduct affecting 1 or more other protected computers aggregating at least \$5,000 in

⁴ Fifth Circuit Pattern Jury Instruction 2.76A (5th Cir. 2024).

value, in violation of 18 U.S.C. §§ 371, 1030(a)(5)(A), 1030(c)(4)(A)(i)(I), and 1030(c)(4)(B)(i).

2. Antropenko also admits and agrees that starting at least on or about May 6, 2018, and continuing through at least on or about August 19, 2022, within the Northern District of Texas, Dallas Division, and elsewhere, he did knowingly combine, conspire, and agree with other persons known and unknown to the Grand Jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit: 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, computer fraud and abuse as prohibited by 18 U.S.C. §§ 1030(a)(5)(A), 1030(c)(4)(A)(i)(I), and 1030(c)(4)(B)(i), knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, and knowing that the transactions were designed 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), all in violation of 18 U.S.C. §§ 1956(h) and 1956(a)(1)(B)(i).

3. Specifically, Antropenko was a leader of a ransomware conspiracy that operated from at least on or about May 6, 2018, through at least on or about August 19, 2022. As part of that conspiracy, Antropenko agreed with at least one other person to cause damage to computers connected to the internet, without authorization, by transmitting malicious code to those computers. Antropenko knew the unlawful purpose of this conspiracy and joined in it with the intent to further its unlawful purpose.

4. The conspirators used malware to encrypt some or all of the data stored on victims' computers and transmit some or all of that data to another computer under the conspiracy's control. After a ransomware attack, the conspirators typically demanded a ransom payment from the victim in exchange for decrypting the victim's data, refraining from publishing the data, deleting the conspirators' copy of the data, or any combination thereof. The conspiracy used various types of ransomware, including but not limited to Zeppelin and GlobeImposter.

5. The conspirators gained access to victim networks through various methods such as brute force attacks to guess passwords. Antropenko committed various overt acts to further the goals of the conspiracy, such as purchasing software used to commit ransomware attacks, registering an email address used to communicate with victims, assisting with decrypting victims' data, and managing other members of the conspiracy.

6. Antropenko began participating in the ransomware conspiracy before he moved to the United States, and continued to participate in the ransomware conspiracy after moving to the United States. Some of the coconspirators were located outside of the United States. Some of the conspiracy's victims were located in the United States, including at least one in the Northern District of Texas. In total, the conspiracy targeted at least 50 victims. The conspiracy caused losses to victims of at least \$1,500,000.

7. Antropenko also conspired to commit money laundering; the defendant knew the unlawful purpose of this agreement, and the defendant joined in the agreement with the intent to further its unlawful purpose. The defendant and others conducted financial transactions involving the proceeds of specified unlawful activity, that is the

ransomware conspiracy described above and the underlying crimes, including causing damage to a protected computer without authorization. The defendant knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, and further knew that the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of the unlawful activity.

8. Antropenko laundered the proceeds of ransomware payments using various sophisticated means, such as multiple layers of laundering, converting cryptocurrency from one type to another, and using foreign-based cryptocurrency mixing services such as ChipMixer. To do so, Antropenko conspired with others to launder cryptocurrency in various ways, including exchanging cash for cryptocurrency at in-person meetups in the United States, filing joint tax returns with false information, and coordinating the deposit of ransomware proceeds to accounts controlled by himself and at least one other person. The funds laundered by Antropenko and his coconspirators included funds from victims in the United States, including a victim in the Northern District of Texas.

9. Antropenko's proceeds from the ransomware conspiracy and property involved in or traceable to the ransomware and money laundering conspiracies included at least the following assets:

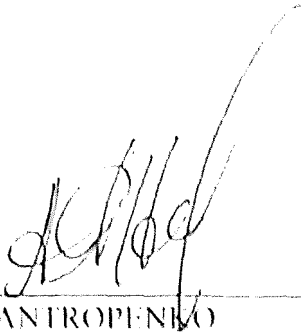
- a. \$70,900 in United States Currency seized pursuant to a warrant executed in the Central District of California on or about February 13, 2024.
- b. A Lexus LX570 with VIN JT[...]09 seized pursuant to a warrant executed in Central District of California on or about February 13, 2024.

- c. Various cryptocurrency (approximately 0.39 ETH, 1,447,841.26 USDT, and 677,173.7 USDC) seized from cryptocurrency wallet 0x[...]98 pursuant to a warrant issued in the Northern District of Texas on or about February 12, 2024.
- d. 6,150,910.31386160 CRO seized from cryptocurrency wallet cr[...]tn pursuant to warrants executed in the Eastern District of Virginia between on or about July 9, 2025 and on or about August 6, 2025.

10. The defendant agrees that the defendant committed all the essential elements of the offenses. This factual resume is not intended to be a complete accounting of all the facts and events related to the offense charged in this case. The limited purpose of this statement of facts is to demonstrate that a factual basis exists to support the defendant's guilty plea to Counts One and Three of the indictment.

[Nothing further on this page]

AGREED TO AND STIPULATED on this 6th day of January 2026.



IANIS ANTROPENKO
Defendant



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