

LDM  
F. ##2024R00943

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

BILL OF PARTICULARS

- against -

25-CR-191 (NRM)

IURII GUGNIN,  
also known as "Iurii Mashukov,"  
and "George Goognin,"

Defendant.

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The United States of America, by and through JOSEPH NOCELLA, JR., United States Attorney for the Eastern District of New York, and Laura D. Mantell, Assistant United States Attorney, hereby files, pursuant to Federal Rule of Criminal Procedure 32.2(a), the following Bill of Particulars for Forfeiture of Property.

The above-captioned Indictment seeks forfeiture of property pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(1), 982(a)(2), and 982(b)(1); Title 21, United States Code, Section 853(p); and Title 28, United States Code, Section 2461(c), in connection with Counts One through Eleven and Seventeen through Twenty-Two of the Indictment. The United States hereby gives notice to the defendant that the United States also seeks forfeiture of the following property:

- (i) approximately \$198,685.10 in Tether (USDT) seized by law enforcement on or about October 16, 2025, from virtual currency wallet TMA5rHfZpmVXMmBB59JQ77XdAACTzhiAVB, and all proceeds traceable thereto; and
- (ii) approximately \$30,000.00 in USDT seized by law enforcement on or about October 16, 2025, from virtual currency wallet

TVVJZLR4RAY6Rv2cdacSnD2UVxnR8QnnQW, and all proceeds  
traceable thereto.

The United States reserves the right to supplement or amend this Bill of Particulars.

Dated: Brooklyn, New York  
November 7, 2025

JOSEPH NOCELLA, JR.  
United States Attorney  
Eastern District of New York  
271-A Cadman Plaza East  
Brooklyn, New York 11201

By: /s/ Laura D. Mantell  
Laura D. Mantell  
Assistant U.S. Attorney  
(718) 254-6253

To: All Counsel of Record (by ECF)