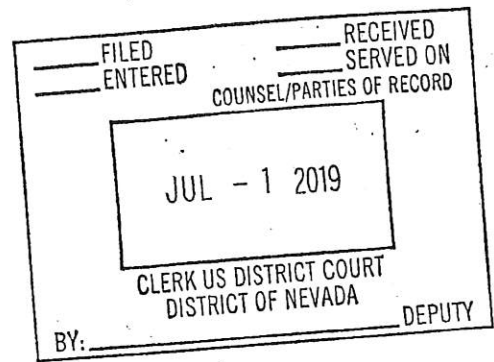


NICHOLAS A. TRUTANICH
United States Attorney
District of Nevada
Nevada Bar Number 13644
NICHOLAS D. DICKINSON
Assistant United States Attorney
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
Phone: (702) 388-6336
Email: nicholas.dickinson@usdoj.gov
Attorneys for the United States of America

Counsel for the United States



UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

-oOo-

UNITED STATES OF AMERICA,

Plaintiff

vs.

FREDI KAZIMIRSKY,

Defendant.

COMPLAINT

Magistrate No. 2:19-mj-0494-BNW

VIOLATIONS:

18 U.S.C. §§ 1952 – *Use of a Facility of Interstate Commerce to Promote Extortion*

BEFORE the United States Magistrate Judge, Las Vegas, Nevada, the undersigned Complainant, being duly sworn, deposes and states:

Count One

(Use of a Facility of Interstate Commerce to Promote Extortion)

From on or about June 27, 2019 through on or about June 28, 2019,

FREDI KAZIMIRSKY,

used a facility of interstate commerce, namely a telephone, with intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is, extortion in violation of Nevada Revised Statue 205.320, and thereafter performed and attempted to perform an act to promote, manage, establish, carry on

1 and facilitate the promotion, management, establishment and carrying on of the unlawful
2 activity, all in violation of Title 18, United States Code, Section 1952(a)(3).

3 **AFFIANT EXPERIENCE**

4 1. Your Affiant is a Special Agent with the Federal Bureau of Investigation ("FBI")
5 currently assigned to the Las Vegas, Nevada Division and has been so employed for 3 years.
6 Before joining the FBI, I was a police officer for 14 years at the Mundelein Police Department in
7 Illinois. As a police officer, I was assigned to the Special Operations Unit and Chicago Division
8 of the FBI as a federally deputized Task Force Officer. I am currently assigned to the FBI's Las
9 Vegas Safe Streets Task Force and I am responsible for investigating a variety of violent crimes,
10 including bank robbery, kidnapping, extortion, robbery, carjackings, assaults and murders of
11 federal officers, racketeering related violent offenses, as well as long-term investigations into the
12 activities and operations of career criminals, criminal enterprises, drug trafficking organizations,
13 and violent street gangs. I have experience in conducting criminal investigations, including the
14 investigation of criminal groups and conspiracies as well as the collection of evidence and the
15 identification and use of witnesses.
16

17 2. The following information contained within this criminal complaint is based upon
18 my participation in this investigation or information provided to me by other FBI agents and law
19 enforcement personnel. Because this Affidavit is being submitted for the limited purpose of
20 securing a Criminal Complaint, I have not included each and every fact known to me concerning
21 this investigation. I have set forth only those facts that I believe are necessary to establish probable
22 cause for the above listed offense. All times noted are approximate.

23 **PROBABLE CAUSE**

24 3. On June 27, 2019, the Victim ("VICTIM") reported to the FBI that he was
25 receiving extortion threats. On June 28, 2019, the Victim came to the Las Vegas FBI field office

1 and provided the following details. VICITM resides out of state. Approximately two months ago,
2 VICTIM was in Las Vegas and arranged for a prostitute to meet him at his hotel room at a resort
3 on the Las Vegas Strip. FREDI KAZIMIRSKY arrived at the VICTIM's hotel room. The
4 VICTIM and FREDI KAZIMIRSKY consumed alcohol and drugs and had an intimate
5 encounter. Following this encounter, FREDI KAZIMIRSKY gave VICTIM his cellphone
6 number, 702-XXX-0169. VICITM kept in contact with FREDI KAZIMIRSKY via text
7 messaging.

8 4. In June 2019, VICTIM and FREDI KAZIMIRSKY planned to meet again in the
9 Las Vegas area. During the week of June 24, 2019, the VICTIM communicated with FREDI
10 KAZIMIRSKY and both agreed to meet, but plans never allowed the meet to occur.

11 5. On June 27, 2019, VICTIM received a text message on his cellphone from
12 cellphone 702-XXX-0169. The text stated, "So let me get this straight, You are not going to meet
13 me?" The VICTIM responded by saying he was meeting with friends and family and didn't have
14 the time to meet. Following VICTIM's response, cellphone 702-XXX-0169 texted VICTIM
15 stating, "I have a surprise for you." Following that text, cellphone 702-XXX-0169 send the
16 following five text messages to the VICITM:

- 17 • Yes I been filming from my other phone when we had action. Yes ive been through
18 you phone while was in the toilet. You don't want to answer that's fine, like ive
19 said you have 24 hours to give me cash. If I don't get shit from you. It will be sold
20 the same day to a third pary.
- 21 • Porn.com will offer me 50,000\$, of any famous, x famous person. TMZ will give
22 me around 300,000 for Discrete interview and my videos. Any major porn site like
23 Xvideos, pornhub, HDporn, celebrity sex tapes.net will give me around 40,000 for
24 the footage. In dark websites I can sell it for mor then 60,000\$ dollars. I don't play
25 no games. And don't try anything funny for me. I did this to a wwe diva before
when she was thinking I'm playing and got over 40000\$ in pornhub for her fucking
me anal.

- 1 • Ain't nobody know this is [VICTIM].... Because I told them that I have a very
2 famous gamble winner ... and they say how much they willing to pay. I'm going
3 to fly back to Russia on 10 the July for good, leaving America. I want 100,000\$
4 dollars in cash from you in 24 hours. Or the vidoes will be on every major site in
5 less then 30 hours. This is my real, and TRUE. Don't fuck with me [VICTIM.]
6 Take it or leave it.. but please don't think that I'm playing. I need the money.
- 7 • I will give you the only hard drive copy inside of the USB port I have to the footage.
8 I'm being legit with you. I took my contacts from any escorts website. So ther is
9 no way you can try something funny, plys this is a fake number on VPN service.
10 100,000\$ in cash in a suitcase. 24 hours start now 4 pm 6.27.19. On time deal only.
11 What is gonna be [VICTIM]? We doing this or I'm gonna do what I have to do?
- 12 • I was about to tell you this face to face, but since you playing games im telling you
13 this right now! Give me an answer. Yes or no. If you aint paying somebody else
14 will.

15 6. On June 28, 2019, at approximately 2:49 p.m., VICTIM placed a consensually
16 monitored call to 702-XXX-0169. VICTIM identified the answering voice as the same person he
17 met with approximately two months prior, who FBI later identified as FREDI KAZIMIRSKY.
18 FREDI KAZIMIRSKY reiterated that he wanted \$100,000 by the end of the day or he would
19 ruin the reputation of the VICTIM by selling their sexual encounter that he recorded from their
20 prior engagement. The duration of the call was approximately three minutes.

21 7. At approximately 3:03 p.m., VICTIM received a text message from 702-XXX-
22 0169. The text message contained "100,000\$ not less not more...I wont wait any longer you got
23 till night time don't screw it man." At approximately 7:06 p.m., VICTIM placed a consensually
24 monitored call to 702-XXX-0169. VICTIM informed FEDI KAZIMIRSKY that they only had
25 \$54,000 and to meet at the Residence Inn located at 370 Hughes Center Drive, Las Vegas,
Nevada. FREDI KAZIMIRSKY agreed and said VICTIM would owe him the rest later.

8. On June 28, 2019, at approximately 7:33 p.m., VICTIM received a text message
from phone number 702-XXX-0169. The text message contained "Im here where we meeting
and talking." Law enforcement observed a black Toyota sedan park at the entrance to Residence

1 Inn. Law enforcement saw FREDI KAZIMIRSKY get out of the black Toyota sedan and entered
2 the Residence Inn. VICTIM notified FREDI KAZIMIRSKY to meet at room 804. FREDI
3 KAZIMIRSKY was observed entering the lobby elevator and went to room 804, where he was
4 taken into custody by law enforcement.

5 9. Law enforcement learned that the black Toyota sedan was driven by an Uber driver
6 and that there were also two female passengers. The females stated that just met FREDI
7 KAZIMIRSKY earlier in the day and that FREDI KAZIMIRSKY told them he had business to
8 take care of at the Residence Inn and that he would be back in five minutes.

9 10. Post-arrest, FREDI KAZIMIRSKY was read his Advice of Rights from FBI form
10 FD-395. FREDI KAZIMIRSKY waived his rights and agreed to speak with interviewing agents.
11 The interview was video and audio recorded. FREDI KAZIMIRSKY admitted sending the text
12 messages to the VICTIM. FREDI KAZIMIRSKY stated that he learned the VICTIM was
13 famous and a professional high stakes gambler by googling the Victim's name. FREDI
14 KAZIMIRSKY thought that VICTIM was capable of getting \$100,000. FREDI KAZIMIRSKY
15 stated he was joking but repeatedly stated he did this to teach the VICTIM a lesson.
16

17

18

19

20

21

22

23


24

25

CONCLUSION

11. Based on the above facts and circumstances, your Complainant believes there is probable cause that that **FREDI KAZIMIRSKY**, Defendant, did violate Title 18, United States Code, Section 1952(a)(3), to wit: Use of a Facility of Interstate Commerce to Promote Extortion.

Respectfully submitted,


Brian Wainscott, Special Agent
Federal Bureau of Investigation

SUBSCRIBED and SWORN to before me

This 29th day of June, 2019


UNITED STATES MAGISTRATE JUDGE