

ORDERED UNSEALED on 04/19/2024 s/ melodyqui

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT
for the
Eastern District of California

United States of America
v.
ANTON ANDREYEVICH IAGOUNOV
Defendant(s)
Case No.

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 5, 2022 to July 24, 2022 in the county of El Dorado in the Eastern District of California, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Rows include 18 U.S.C. § 912 and False Personation of an Officer or Employee of the United States with dates.

This criminal complaint is based on these facts:

(see attachment)

[X] Continued on the attached sheet.

Handwritten signature of David D. Hume

Complainant's signature

FBI SA David D. Hume

Printed name and title

Sworn to me and signed via telephone.

Date: 11:53 AM 3/8/24

Handwritten signature of Carolyn K. Delaney

Judge's signature

City and state: Sacramento, CA

Carolyn K. Delaney, U.S. Magistrate Judge

Printed name and title

1 **AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST WARRANT FOR**  
2 **ANTON ANDREYEVICH IAGOUNOV**

3 I, David Hume, being first duly sworn, hereby depose and state as follows:

4 **I. PURPOSE AND AGENT BACKGROUND**

5 1. I make this affidavit in support of the issuance of criminal complaint and arrest warrant  
6 charging defendant **Anton Andreyevich Iagounov** with violations of 18 U.S.C. § 912 – False  
7 Personation of an Officer or Employee of the United States.

8 2. I am a Special Agent for the Federal Bureau of Investigation (FBI), where I have been  
9 employed for two years. As a Special Agent, in accordance with Title 18, United States Code, Section  
10 2510(7), I am a Federal Law Enforcement Officer of the United States, who is empowered by law to  
11 conduct investigations of and make arrests for offenses enumerated in Title 18.

12 3. I am currently assigned to the Reno Resident Agency of the FBI Las Vegas Division,  
13 where I have so been assigned for two years.

14 4. During my tenure with the FBI, I have conducted surveillance, analyzed phone records,  
15 drafted search warrant applications, interviewed witnesses, recruited confidential sources, supervised  
16 activities of sources, utilized and analyzed GPS tracking technology, executed search warrants, and  
17 executed arrest warrants. I have also received ongoing on-the-job training from other agents and law  
18 enforcement officials.

19 5. The facts in this affidavit come from my personal observations, my training and  
20 experience, and information obtained from other agents and witnesses. This affidavit is intended to show  
21 merely that there is sufficient probable cause for the issuance of an arrest warrant and a criminal  
22 complaint and does not set forth all of my knowledge about this matter.

23 6. Based on my training and experience and the facts as set forth in this affidavit, there is  
24 probable cause to believe that **Anton Iagounov** has committed a violation of 18 U.S.C. § 912 – False  
25 Personation Officer or Employee of the United States, which states as follows:

26 Whoever falsely assumes or pretends to be an officer or employee acting  
27 under the authority of the United States or any department, agency or  
28 office thereof, and acts as such, or in such pretended character demands or  
obtains any money, paper, document, or thing of value, shall be fined  
under this title or imprisoned not more than three years, or both.

1 Iagounov has, on multiple occasions, identified specifically below, pretended to be an officer acting  
2 under the authority of offices and agencies of the United States, and acted as such.

3 **II. PROBABLE CAUSE**

4 **A. Investigation Background**

5 7. The following describes an investigation involving the FBI Reno Resident Agency, as  
6 well as other federal and state investigative agencies, from January 2022 to the present. This  
7 investigation has uncovered ongoing criminal conduct by Iagounov, which includes impersonating a  
8 federal agent on multiple occasions, specified here in Section II.E, below.

9 8. In December 2021 and January 2022, the FBI and ATF investigated a bomb threat that  
10 had been called into INTERPOL Operation and Command Center. The investigation determined that  
11 the call had been made from a “spoofed”<sup>1</sup> telephone number, in an attempt by the caller to make it  
12 appear that another individual had made the threat. During the course of this investigation, agents from  
13 the FBI and ATF received calls from an individual claiming to work for the “intelligence community,”  
14 giving the agents false information about the purported threat. The caller used voice distortion  
15 technology to disguise his voice, but the cadence and language the caller used indicated it was the same  
16 person calling the different agents. Further investigation identified **Iagounov** as the caller.

17 9. On October 27, 2022, federal agents served a search warrant at **Iagounov**’s residence in  
18 South Lake Tahoe, California, and seized multiple electronic devices, including a mobile telephone and  
19 two computers belonging to **Iagounov**. Case No. 2:22-sw-0769-EFB (E.D. Cal., Oct. 25, 2022). A  
20 forensic download of those devices produced evidence establishing that **Iagounov** was the party  
21 impersonating a federal agent and calling bomb threats to individuals and agencies all over the country.

22 **B. Evidence of Iagounov’s Bomb Threats Establishes His Control Over the Devices**  
23 **Also Used to Impersonate Federal Agents.**

24 10. During the FBI’s search of **Iagounov**’s devices seized during the October 27, 2022  
25 search—including a Samsung Galaxy mobile telephone, from **Iagounov**’s person, as well as a Lenovo

26 \_\_\_\_\_  
27 <sup>1</sup> “Spoofing” is a method by which a caller uses a computer application when making a telephone  
28 call to deliberately falsify the information transmitted to the caller ID display of the receiving party, to  
make it appear as though the caller is calling from a different telephone number. A caller who is able to  
spoof numbers can transmit any telephone number they choose to the receiving party’s caller ID.

1 laptop computer and Hewlett-Packard (HP) desktop computer, from Iagounov's bedroom—agents  
2 uncovered evidence of bomb threats Iagounov had made in late 2021 and early 2022. When making  
3 these threats, Iagounov spoofed the telephone numbers of other people, agencies, and businesses,  
4 thereby disguising his involvement and casting suspicion on others.

5 11. During the search of Iagounov's telephone, agents found a text conversation with the  
6 user of a telephone with the number xxx-xxx-1654, from late December 2021. From that conversation,  
7 it appears that the user did not know Iagounov, nor that Iagounov knew the user (it is unclear why  
8 Iagounov was communicating with this particular user in the first place). Near the same time,  
9 Iagounov's Lenovo laptop's internet browser logged a visit to the website "Fastpeoplesearch.com/xxx-  
10 xxx-1654" (searching for that specific telephone number) on December 31, 2021, at 10:47 p.m.<sup>2</sup> It  
11 appears that Iagounov was attempting to identify the user of this number.

12 12. On January 1, 2022, the next day, Saddleback Memorial Hospital, in Laguna Hills,  
13 California, received a bomb threat from the number xxx-xxx-1654.

14 13. On that same day, at 12:00 p.m. (Mountain Time), the office of Senator Cynthia Lummis  
15 (Wyoming) received a call in which the caller indicated that someone "plans on blowing up your office  
16 with an improvised explosion device." The caller ID indicated that the call originated from a telephone  
17 number belonging to Saddleback Memorial Hospital. The caller's voice matched that used with a voice  
18 distortion technique in the voicemails left for federal agents in the investigation of the threats to  
19 INTERPOL. Despite the voice distortion, the caller sounds the same in the recordings based on his  
20 accent, cadence, and phrasing. (When agents searched Iagounov's Lenovo Laptop, after seizing it on  
21 October 27, 2022, the internet browser history shows that its user had searched via DuckDuckGo for  
22 "Memorialcare Saddleback Hospital," on January 3, 2022 at 10:29 a.m. As described below, it appears  
23 that Iagounov was looking for news reports related to the threat he had called in.)

24 14. Further searches on Iagounov's Galaxy telephone showed that, on April 14, 2022, at  
25 approximately 11:22 a.m., he conducted a DuckDuckGo search for "long beach police dispatch," "texas  
26 capital building" and "texas city hall." Less than 20 minutes later, at 11:40 a.m. the city hall for the City  
27

28 <sup>2</sup> All times mentioned in this affidavit are Pacific Time, unless otherwise noted.

1 of Temple, Texas, received a bomb threat from telephone number 562-435-6711, which is the contact  
2 number that appears on the Long Beach Police Department dispatch website. In the voicemail the caller  
3 left, he stated, "There is a bomb at Temple City Hall that is going to go off one hour from now. Very  
4 many people are going to die and we're gonna take the country back." At approximately 9:11 p.m. that  
5 same day, **Iagounov's** telephone's internet browser recorded a DuckDuckGo search for "temple bomb  
6 threat," and the user captured a screenshot of a news website's headline reporting the incident.

7 15. Data from **Iagounov's** Samsung Galaxy telephone also showed DuckDuckGo searches  
8 for "luxor casino security" and "las vegas police non dispatch," at approximately 11:27 a.m. on the same  
9 day. Roughly 30 minutes later, Las Vegas Metro Police Department (LVMPD) received a telephone  
10 call in which the caller stated that an explosive device would explode at the Luxor Casino at "noon  
11 today." The call appeared to originate from Long Beach Police Department dispatch telephone phone  
12 number ((562) 435-6711). **Iagounov's** Samsung telephone recorded a DuckDuckGo search that  
13 evening, at 9:11 p.m., for "luxor bomb." The next day, April 15, at 8:02 a.m., the user conducted  
14 another search for "bomb threat luxor." Later that day, at 7:16 p.m., the user of **Iagounov's** Lenovo  
15 laptop computer conducted DuckDuckGo news search for "bomb squad luxor."

16 16. Also on April 15, 2022, at approximately 11:22 a.m., the Albany Fire Department in  
17 Albany, New York, received a call from a male caller who stated there was a "thermal device" in a  
18 Walmart in Albany that would detonate "in one hour." The call appeared to come from the telephone  
19 number for a shopping mall in Torrance, California, the Del Amo Fashion Center, 310-542-8525. (On  
20 **Iagounov's** Samsung Galaxy telephone, agents found a picture of a computer screen displaying a Times  
21 Union article about the Walmart bomb threat. Time stamps indicated that the picture was created on  
22 April 23, 2022, at approximately 11:48 p.m., roughly 25 minutes after the threat had been made.)

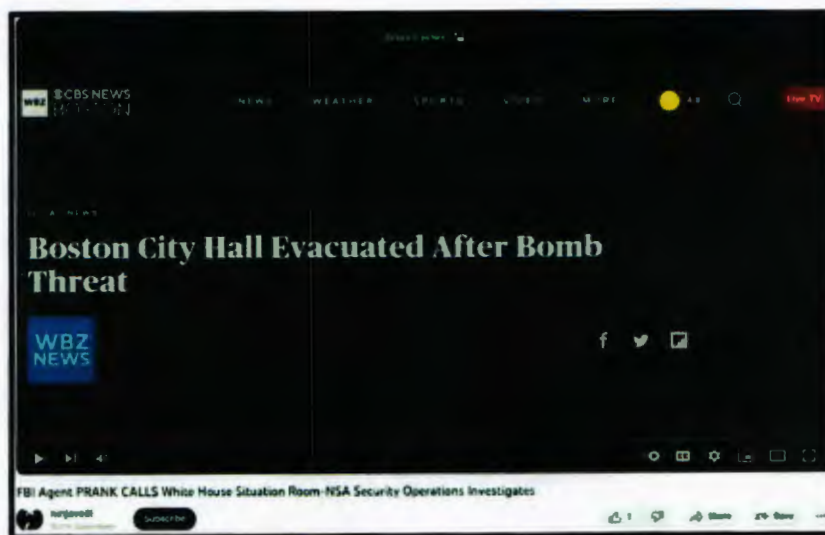
23 17. Several minutes after the threat to Walmart, at approximately 11:29 a.m., the Torrance  
24 Police Department received a call in which the caller stated "there is a bomb at the Del Amo Fashion  
25 Center set to go off precisely one hour from now." The call appeared to originate from the telephone for  
26 the Fortune Cookie Chinese Restaurant in Torrance. Responding officials determined the number of  
27 origin had been spoofed. At approximately 11:35 a.m., a caller to the Torrance Fire Department made a  
28 similar threat concerning a bomb at the Del Amo Fashion Center. (**Iagounov's** Lenovo computer

1 recorded DuckDuckGo searches for news articles including the terms “bomb mall threat,” and “torrance  
2 bomb,” at approximately 3:34 p.m. that same day.)

3 18. Around the same time as the second threat to the Del Amo Fashion Center, at 11:35 a.m.,  
4 the offices for Saratoga State Park, outside Albany, received a call about a “nuclear device” that was  
5 going to be set off in an hour. The call appeared to come from the telephone number 518-242-4400,  
6 which is the number for the Albany County Sheriff’s Office at the Albany International Airport. (Data  
7 from **Iagounov**’s Lenovo computer indicates that he conducted a DuckDuckGo search for “Albany  
8 Sheriffs dispatch non emergency contact phone,” near the time the threat was made.)

9 19. Also on April 15, 2022, at 12:06 p.m. (Eastern Time), the Boston Fire Department  
10 received a bomb threat from a male caller who stated “a bomb will go off at city hall in exactly one  
11 hour. You have been warned.” Data from **Iagounov**’s Samsung Galaxy telephone show DuckDuckGo  
12 searches for news articles including the terms “bomb” and “boston” at approximately 3:33 p.m. that day.  
13 The results showed headlines for the bomb threat at Boston City Hall as well as the threat made to the  
14 Walmart in Albany on the same day. A screenshot of DuckDuckGo search results for the term “bomb”  
15 was saved to **Iagounov**’s Samsung Galaxy telephone. A search of the HP desktop computer seized from  
16 **Iagounov**’s room also recovered a picture of a news article about the Boston bomb threat incident. On  
17 November 21, 2023, **Iagounov** uploaded a video to his YouTube channel, “Ninjavelli,” where he  
18 included a screenshot of the news article. (See Pic. 1, below.)

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23 **Pic. 1**



1           20.     On April 16, 2022, at 1:20 a.m., Harry Reid International Airport Dispatch, Las Vegas,  
2 received a call from the telephone number 713-416-5591, in which the caller stated, “a thermonuclear  
3 explosive device is set to go off at your airport precisely an hour from now.” The call appeared to  
4 originate from the office of Congressman Eugene Wu. (On **Iagounov’s** Lenovo computer, agents found  
5 a PDF from the website [www.fastpeoplesearch.com](http://www.fastpeoplesearch.com), listing the Congressman’s office’s contact  
6 information. The PDF lists telephone number 713-416-5591 as the most recent number for Eugene Wu.  
7 This PDF was stored in a folder on Iagounov’s computer titled “hacking\_case studies.”)

8           21.     In addition to the evidence described above, agents found evidence of **Iagounov’s**  
9 searches for, and visits to, websites explaining how to spoof telephone numbers. Browser activity on his  
10 HP desktop computer showed visits to the website “[worldofprankcalls.com/2020/08/06/setting-up-a-  
11 prank-call-spoofing-system-using-raspberry-pi](http://worldofprankcalls.com/2020/08/06/setting-up-a-prank-call-spoofing-system-using-raspberry-pi).” A Raspberry Pi is a small single-board computer with  
12 an open-design allowing it to be programmed for a wide variety of uses including emulating telephone  
13 systems. During the October 27, 2022 search, agents seized a Raspberry Pi from **Iagounov’s** bedroom.

14           **C. Iagounov’s False Claims of Law Enforcement Employment**

15           22.     On April 22, 2022, **Iagounov** was stopped by Carson City Sheriff’s (CCSO) deputies for  
16 driving with an obstructed license plate. Deputies noticed what appeared to be red and blue police lights  
17 in **Iagounov’s** vehicle. They cited him for violating Nevada Revised Statutes 484A.480 – Designation  
18 of authorized emergency vehicles; equipment; limitations on use of warning devices. Deputies searched  
19 **Iagounov** and found a counterfeit FBI badge on his person. **Iagounov** was not forthcoming about  
20 where the badge had come from. CCSO Detective Francisco Torres arrested **Iagounov** at the scene.

21           23.     Following **Iagounov’s** arrest, deputies interviewed him under a *Miranda* warning.  
22 Deputies also contacted FBI agents, who joined the interview. **Iagounov** told agents that he worked for  
23 various federal agencies. He claimed to have contracted or trained with the Department of Homeland  
24 Security, Federal Emergency Management Agency, U.S. Marshals, and Department of Justice. He also  
25 claimed that he could not tell the interviewing agents where he had obtained the fake FBI badge. He  
26 later said he got it while “red-teaming”<sup>3</sup> in an operation but told the agents that they were “not cleared”  
27

28           <sup>3</sup> Federal agencies conduct training exercises periodically to test their own ability to defend  
against external threats. The “Red Team” is a team of agents who play the role of enemy agents in those

1 to know about it. He also claimed he had worked for the National Security Agency (NSA) and received  
2 awards from a four-star general. **Iagounov** provided a telephone number for an NSA employee whom  
3 **Iagounov** claimed could verify his work.

4 24. Agents then contacted the NSA employee, who indicated she did not know **Iagounov** and  
5 had not worked with him.<sup>4</sup> Agents also confirmed that **Iagounov** was not employed by or working with  
6 the NSA or any of the other agencies he named.

7 **D. Iagounov's Harassment of CCSO Personnel**

8 25. Following **Iagounov's** arrest on April 22, 2022, he began harassing CCSO personnel,  
9 including Sheriff Kenneth Furlong and CCSO Det. Francisco Torres, with repeated and threatening  
10 telephone calls, which continue to this day.<sup>5</sup> While **Iagounov** has at times made some effort to disguise  
11 his voice, the caller's cadence and accent match **Iagounov's** speech. The language **Iagounov** used in  
12 these calls is also consistent with language used not only in the bomb threats described above, but also  
13 in numerous videos he has posted to his social media accounts (which federal agents have reviewed), in  
14 which he often touts anti-government messaging.

15 26. In addition, on May 6, 2022, **Iagounov** sent a FOIA request to the FBI, purporting to be  
16 from Sheriff Furlong, asking for information on conspiracies targeting the sheriff. **Iagounov's** Lenovo  
17 laptop contained evidence that, on May 6, 2022, he sent the FBI an electronic FOIA request from the  
18 email address [kfurlong@candassociates\[.\]com](mailto:kfurlong@candassociates[.]com). The submitter claimed to be Sheriff Ken Furlong and  
19 wrote: "I am a sworn Category I peace officer, and the designated Sheriff elected by the people, for the  
20 City of Carson City, Nevada. I believe that I am the target of a nationwide conspiracy designed to  
21 overthrow our Republic, and the information herein being sought requires urgency in it's release to the  
22 public." The submitter requested information regarding visitor logs and names of Sacramento FBI  
23 \_\_\_\_\_  
exercises.

24 <sup>4</sup> This particular NSA employee had organized an NSA code breaker challenge in 2020, a  
25 competition open to college students. As part of that, she had sent mass emails to the contestants,  
26 including **Iagounov**, with her contact information in the signature block. It is likely that this is how  
**Iagounov** had acquired her name and contact information.

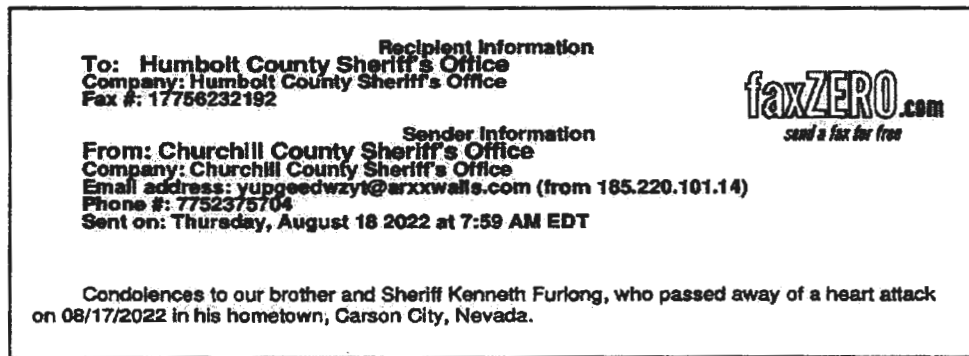
27 <sup>5</sup> Because **Iagounov** often calls from spoofed or blocked telephone numbers, Det. Torres has  
28 been blocking calls from unknown numbers for months. The charges arising from **Iagounov's** April 20,  
2022 arrest remain pending and **Iagounov** is currently in fugitive status, having failed to appear for all  
court dates since his arrest. At the time of writing, agents believe he has fled the country.



1 personnel on duty on January 7, 2014. Following agents' seizure of **Iagounov's** laptop on October 27,  
2 2022, agents found on it a PDF copy of a FOIA request matching the request submitted to the FBI under  
3 Sheriff Furlong's name. (The FBI has confirmed with Sheriff Furlong that he made no such request.) In  
4 addition, **Iagounov** had stored on his computer an image of a signature ostensibly belonging to Sheriff  
5 Ken Furlong saved as "furlong.png." This image file was saved in the folder named "hacking\_case  
6 studies."

7 27. On August 18, 2022, multiple law enforcement agencies in Nevada received faxes  
8 appearing to come from other law enforcement agencies, announcing the death of Sheriff Furlong the  
9 previous day. (See Pic. 2, below.) According to Sheriff Furlong, this report of his death is false.

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11  
12 Pic. 2



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17 28. The faxes included a cover sheet expressing condolences for Sheriff Furlong's passing  
18 but also attached a counterfeit FBI Wanted poster for "Kenneth Peachfuzz," which included an image of  
19 Sheriff Furlong above a litany of derisive information, alleging corruption, child molestation, and sexual  
20 deviancy (including references to "coprophilia" and "urophilia," which are sexual fetishes involving  
21 human waste). (See Pic. 3, below.)

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Pic. 3

18-Aug-2022 12:83 From Churchill County Sheriff Office. Phone 8775 FaxZero.com p.2



# WANTED BY THE FBI

## KENNETH PEACHFUZZ

**Coprophilia, Urophilia, Prostitution, Child Molestation, Negligent Discharge, and Pattern of Practice Under Color of Law**



**Description**

**Aliases:** Sex Machine, Big Bad Wolf, Daddy, Pappa, Penis the Menace  
**Date of Birth:** 1800's **Place of Birth:** Toilet Bowl  
**Hair:** Preferably none **Eyes:** Wide Shut  
**Height:** Give them an inch they want 6 more **Weight:** 100lbs  
**Sex:** Androgynous **Race:** \*Merican  
**Scars and Marks:** "Trump Train" on buttocks **NCIC:** Only when leaking intel to informants

**Reward**

Up to \$1,000,000 in Municipal-Bonds for testimony that will lead to conviction.

**Remarks**

Was observed on video camera with other public officials at the Bunny Ranch, being defecated and urinated on by sex-workers while engaged in unusual sexual activity in a room designated for Coprophilia and Urophilia.

**Caution**

Is known for his vigor and constant appetite for sex. Will obstruct or delay justice, and has destroyed and/or tampered with evidence in the past.

29. Evidence from **Iagounov's** HP computer shows that **Iagounov** created and sent these faxes. His computer's internet browser history included Google searches on August 18, 2022 (the day the fax was sent) using the terms, "what is the style of sex called when people shit on eachother" and "urifellia." Data from the computer also showed that a PDF titled "kenneth\_peachfuzz.pdf" had been created on that computer around 3:00 a.m., on August 18, 2022, and saved to a removable hard drive. Agents served a subpoena on the fax service used to send the fax announcing Sheriff Furlong's death (falsely). The records sent in response show that the email sent from the customer attached a PDF with the same filename as the PDF from **Iagounov's** computer: "kenneth\_peachfuzz.pdf."

30. Nearly a year later, on June 8, 2023, Sheriff Furlong received a voicemail on his home telephone line from an individual that he believed to be **Iagounov**, based on the voice. The voicemail

1 said that the FBI would soon be arresting Furlong for “exploiting children.”

2       31. A few days later, on June 13, 2023, at approximately 4:06 a.m., CCSO Det. Torres  
3 received a call from what appeared to be Sheriff Furlong’s home phone number. Det. Torres did not  
4 answer the call. That same morning, Sheriff Furlong received two phone calls between 4:00 a.m. and  
5 4:30 a.m. When Sheriff Furlong answered the first call, he heard nothing. When he answered the  
6 second call, the call transferred him to Jones West Ford car dealership. (During his October 27, 2022  
7 interview with federal agents, **Iagounov** explained that he can make two telephones call each other at  
8 the same time, and that he can listen in on the call when both parties have answered. **Iagounov** referred  
9 to the technique as “SIP trunking.” Agents recovered from **Iagounov**’s electronic devices recordings he  
10 had made of telephone calls in which both parties seem to believe that the other party had initiated the  
11 call. One of the recordings was of a call between the Central Intelligence Agency public line and the  
12 White House Situation Room. **Iagounov** posted a recording of this call on his YouTube channel, with a  
13 caption that read, “FBI Special Agent **Iagounov** strikes back.”)

14       32. On September 8, 2023, at approximately 7:30 a.m., CCSO Deputy Samantha Torres (Det.  
15 Torres’ wife) was off duty at her residence. Her personal cell phone rang and its screen showed “No  
16 Caller ID” (which is common for calls coming from law enforcement agencies). When she answered, a  
17 male voice that sounded familiar said, “Samantha, hi.”<sup>6</sup> The male continued that several CCSO deputies  
18 had been exposed to methamphetamine through skin contact and he was calling to check on “Francisco,”  
19 as one of those exposed. Deputy Torres asked the caller who he was. The caller responded that he  
20 could not disclose that information, but that he was from a “federal agency.” The caller gave an  
21 agency’s name but Deputy Torres was unable to hear what he said. Det. Torres, having heard part of the  
22 conversation, told her the caller was likely **Iagounov**, and advised her to end it, which she did.

23       33. The next day, September 9, 2023, at approximately 6:46 a.m., Deputy Torres received  
24 another phone call from an unknown number. She sent the call to voicemail. She later listened to the  
25 voicemail and again recognized **Iagounov**’s voice. He seemed to have made no attempt to disguise it

26 \_\_\_\_\_  
27 <sup>6</sup> Deputy Torres was in fact familiar with **Iagounov**’s voice from previous law enforcement  
28 contacts. During her prior tenure with another Nevada sheriff’s office, she had encountered **Iagounov**  
several times when he worked at the Mont Bleu Casino in Stateline, Nevada. She had also seen several  
of **Iagounov**’s social media videos, in which he speaks at length.

1 this time. **Iagounov**'s voicemail included the following:

2 "Hey Samantha, also, you might want to let your DEA friends know that,  
3 um, 'La Eme'—piece of shit, 'Evil'—somebody got him. Alright? ....  
4 [Y]'all are going to be sorry you ever trafficked narcotics – y'all going to  
5 be real fucking sorry. That little badge of yours, that shit ain't gonna  
6 protect anybody. Not your guns, not your chewing tobacco, not your  
7 whiskey, not your badges. Let those people know that if I catch any more  
8 of your CI's trafficking drugs, I am going to be sending them back to you  
9 people in fucking pieces.... You all won't be trafficking no cocaine, ever.  
10 Not into America, not worldwide.... I am going to fucking deal with the  
11 problem. We are going to find out where it stems from and we are going to  
12 deal with that shit, for real."

13 **E. Falsely Pretending to be a Federal Agent (Four Counts)**

14 34. Agents' search of **Iagounov**'s electronic devices, seized on October 27, 2022, also  
15 uncovered **Iagounov**'s pretending to be a federal agent by creating false investigative documents, which  
16 purported to be sent by a federal agent, in an attempt to obtain government documents by impersonating  
17 a federal agent.

18 **1. Count One: July 5, 2022**

19 35. On July 5, 2022, **Iagounov** falsely pretended to be a federal agent working for NASA's  
20 Office of the Inspector General (OIG) by authoring an affidavit for a federal search warrant and signing  
21 it in the name of a fictional agent, before sending it to the U.S. Capitol Police.

22 36. On July 5, 2022, U.S. Capitol Police received an email with a PDF attachment of a signed  
23 searched warrant, ostensibly authorizing the search for and seizure of a computer and "access control  
24 logs" located at the Pentagon. The document purported to have been filed with the federal district court,  
25 assigned a magistrate case number, and been designated "SEALED." (See Pic. 4, below.) The  
26 warrant's affidavit appeared to be authored (and sworn) by a "Special Agent Joel O'Neill, NASA Office  
27 of the Inspector General (OIG)," and signed by Judge Beryl Howell, Chief United States Judge for the  
28 District of Columbia. (See Pic. 5, below.) Attachment B to the warrant sought Top Secret/Sensitive  
Compartmented Information and data related to network logistics. (See Pic. 6, below.) In transmitting  
this document, **Iagounov** pretended to be fictional Special Agent Joel O'Neil, who purportedly had the  
authority as a NASA OIG Special Agent to swear out an affidavit for a federal search warrant.

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Pic. 4

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

**SEALED**

Case No. 1:20-mj-01016-DKW-RT

Chief Judge Beryl A. Howell

**FILED UNDER SEAL**

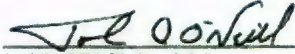
IN THE MATTER OF THE SEARCH OF  
MAC POWERBOOK 500 SERIES MODEL  
550c, & DOD SMART CARD ACCESS  
CONTROL LOGS, CURRENTLY LOCATED  
AT 1000 DEFENSE PENTAGON,  
WASHINGTON, DC 20301

**AFFIDAVIT IN SUPPORT OF AN APPLICATION UNDER RULE 41 FOR A  
WARRANT TO SEARCH AND SEIZE**

I, Special Agent Joel O'Neill, being first duly sworn, hereby depose and state as follows:

Pic. 5

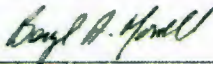
Respectfully submitted,


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 Joel Q. O'Neill, Special Agent  
 NASA-Office of the Inspector General

Subscribed and sworn to before me  
on July 4, 2022:


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 Beryl A. Howell  
 UNITED STATES CHIEF JUDGE

Pic. 6

3. Evidencing content contained within the "Mac PowerBook" reflecting the above-stated names, and their involvement with the "insider threat," or "malicious actors," as such relates to the violations of federal law mentioned in Section 1 of Attachment B, and:

- a. existence of the "doomsday script," or otherwise evidence showing a compromise to "The Golden Codes," and the U.S. National Missile Defense System;
- b. who the contents of the "Mac PowerBook" may have been shared with;
- c. any information showing a compromise to any U.S. protected trade secrets;
- d. any Top Secret/Sensitive Compartmented Information;
- e. any data related to logistics of their network

4. "The Pentagon's" "Lost and Found," located at the "Pentagon Library and

1           37. U.S. Capitol Police alerted NASA to the warrant. NASA OIG Criminal Investigators  
2 reviewed it and confirmed that it had not been created by nor transmitted from their agency. They  
3 confirmed also that there was no NASA OIG Special Agent named Joel O'Neill.

4           38. Searches of **Iagounov's** electronic devices yielded multiple digital versions of the  
5 affidavit, in various stages of editing, establishing that he was its author. Different versions of the  
6 affidavits had caption information adjusted for different federal district courts around the country.

7                   **2. Count Two: July 11, 2022**

8           39. On July 11, 2022, **Iagounov** falsely pretended to be a federal agent working for NASA's  
9 Office of the Inspector General (OIG) by authoring an affidavit for a federal search warrant and signing  
10 it in the name of the same fictional agent, before sending it to United States District Court for the  
11 Central District of California.

12           40. On July 11, 2022, another version of the counterfeit search warrant (labeled this time for  
13 the Central District of California instead of the District Court of Columbia), was submitted to the  
14 Central District of California Emergency Filings via email to the addresses  
15 "emergencyfilings@cacd.uscourts[.]gov" and "emergency\_motions@ca3.uscourts[.]gov." The body of  
16 the transmitting email had been written to appear as if it was a forwarded email conversation between  
17 NASA OIG employees concurring that the warrant was ready for submission to the court. An  
18 examination of the email header showed that the email had been sent from email address **service-**  
19 **processing@usoig[.]us**. A review of open-source tools indicated that the domain **usoig[.]us** was  
20 registered to **Anton Iagounov**. Further open-source analysis indicated that **Iagounov** had also  
21 registered the domain **nsamil[.]us**. The counterfeit warrant purported to seek the same Top  
22 Secret/Sensitive Compartmented Information and data related to network logistics as the warrant  
23 **Iagounov** had sent to the U.S. Capitol Police.

24           41. A court employee at the United States District Court for the Central District of California  
25 received the email. The employee replied to the email address **service-processing@usoig[.]us**, stating,  
26 "I believe this was sent in error to CACD's civil after hours emergency email." The sender then replied,  
27 "This isn't the clerk's desk for criminal complaints?"

28           42. By transmitting this document, **Iagounov** again pretended to be fictional Special Agent

1 Joel O’Neil, who purportedly had the authority as a NASA OIG Special Agent to swear out an affidavit  
2 for a federal search warrant. By responding to the Court’s employee by asking if he had sent the warrant  
3 application to the “clerk’s desk for criminal complaints,” Iagounov further acted falsely in the role of a  
4 federal agent attempting to file criminal process.

5 **3. Count Three: July 18, 2022**

6 43. On July 18, 2022, Iagounov falsely pretended to be a federal agent working for NASA’s  
7 Office of the Inspector General (OIG) by authoring an affidavit for a federal search warrant and signing  
8 it in the name of a real agent, Assistant Special Agent In Charge Michael Mataya, before sending it to  
9 the United States Bankruptcy Court for the Middle District of Georgia.

10 44. On July 18, 2022, NASA OIG ASAC Michael Mataya was contacted by the Clerk for the  
11 Bankruptcy Court for the Middle District of Georgia, to say that the court had received an affidavit from  
12 him to be filed with the district court. ASAC Mataya responded that he had not filed any affidavits with  
13 the Middle District of Georgia. Agents obtained a copy of the affidavit from the Bankruptcy Court,  
14 which purported to be signed by ASAC Mataya. The affidavit was otherwise nearly identical to the  
15 affidavit that **Iagounov** had attempted to file in the Central District of California, under the name of SA  
16 Joel O’Neill, on July 11, 2022, including its recitation of material for which it had the purported  
17 authority to seize.

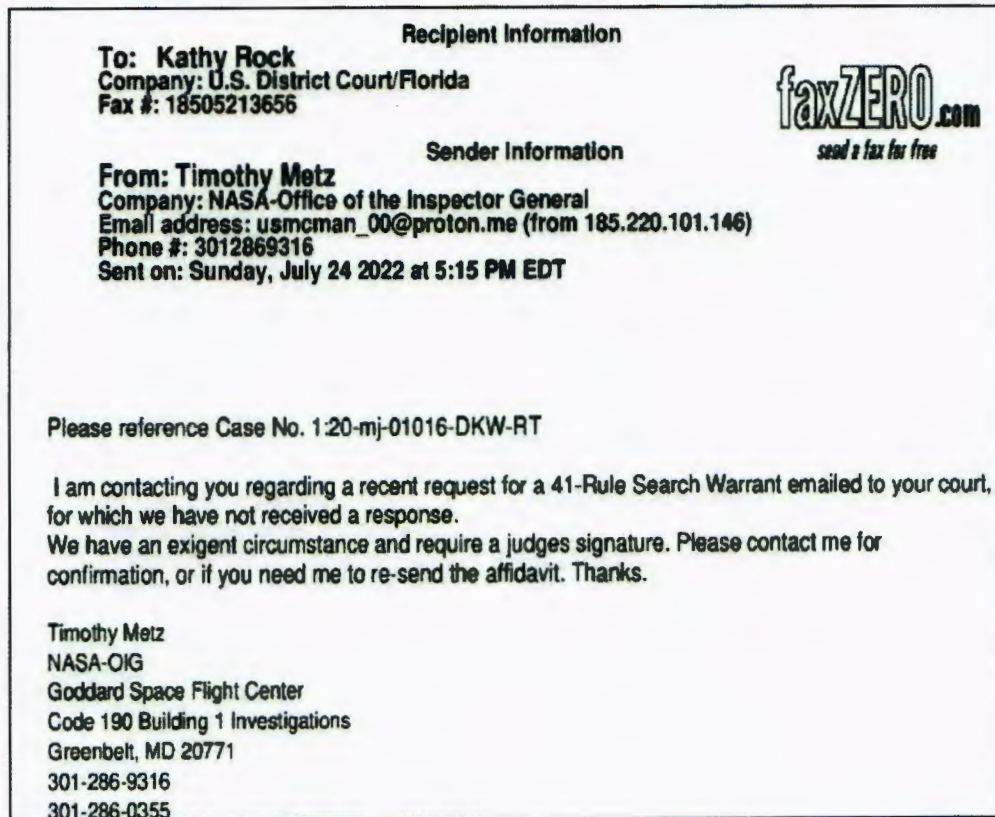
18 **4. Count Four: July 24, 2022**

19 45. On July 24, 2022, Iagounov falsely pretended to be an employee of NASA’s Office of the  
20 Inspector General (OIG) by authoring a fax transmission which demanded from the United States  
21 District Court for the Norther District of Florida a response to a request for a search warrant.

22 46. On July 24, 2022, a fax sent using FaxZero by a user with email address  
23 **usmcman\_00@proton[.]me** was sent to the U.S. District Court for Northern District of Florida, listing  
24 “Timothy Metz, NASA-OIG” as the sender and the sending company as “NASA-Office of the Inspector  
25 General.” The cover text of the fax referred to a “41-Rule Search Warrant” and listed the same case  
26 number as the false warrant sent from **service-processing@usoig[.]us**. (See Pic. 7, below.) The body  
27 of the fax indicated that NASA OIG had previously sent a request for a “41-Rule Search Warrant” to the  
28 Court but had not received a response. The fax went on to claim that an “exigent circumstance”

1 required a judge's signature and asked that the Court contact the sender for confirmation. NASA OIG  
2 SA David Daniels-Watanabe confirmed that the fax was not sent by any NASA OIG employees.

3 47. Agents recovered multiple versions of the counterfeit affidavit from Iagounov's Lenovo  
4 Laptop with the caption pages edited for the following U.S. District Courts: District of Columbia,  
5 Central District of California, Northern District of Florida, Southern District of Utah, Southern District  
6 of New York, Western District of Virginia, Southern District of Indiana, Northern District of Indiana,  
7 Southern District of Ohio, Middle District of Georgia, and the Northern District of Texas.



23 **5. Venue**

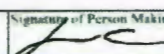
24 48. Evidence of the creation of these documents was found on Iagounov's electronic devices,  
25 including the computers seized from his home in South Lake Tahoe, California, just a few months after  
26 he created and transmitted them, in July 2022. Iagounov was living at that same residence at the time he  
27 transmitted the falsified documents and was therefore within the Eastern District of California when  
28 falsely pretending to be a federal agent.



**F. Additional Evidence Connecting Iagounov to the Charged Conduct**

49. Additional evidence uncovered through the course of this investigation further establishes Iagounov’s involvement in the charged conduct. For example, the email sent to the U.S. Capitol Police on July 5, 2022, attaching the counterfeit warrant, had been sent from the email address **alvin.ch@proton[.]me**.<sup>7</sup> On July 12, 2022, this same email address was used to send a fax to the ATF through online fax service FaxZero. The fax purported to be a DOJ Interstate Firearms Shipment Theft/Loss Report form, filed by Wild Bill’s Guns Too, a business in Carson City, Nevada. The Theft/Loss Report listed four firearms as lost or stolen while in transit from Wild Bill’s Guns Too to a Department of Defense Facility in Saratoga Springs, Utah. The document appeared to be written and signed by an employee of Wild Bill’s Guns. (See Pic. 8, below).

**Pic. 8**

U.S. Department of Justice Bureau of Alcohol, Tobacco, Firearms and Explosives		Interstate Firearms Shipment Theft /Loss Report			
Name and FFL#		Address	Telephone Number		
Shipper Transferor	FFL# 9-88-510-01-3D-04807 Silverado Spur Inc.	1901 N. Carson St. Carson City, NV 89703	775-434-7125		
Consignee Transferee	ORI# ORDOD0000 U.S. Dept. of Defense	Utah Data Center Saratoga Springs, UT 84045	801-256-2360		
Carrier	FedEx	7400 Laguna Blvd. Elk Grove, CA 95758	800-463-3339		
Shipment Tracking Number FedEx 398141012563 & 776217095667		Carrier Claim Number (if available)	Date Shipped 04/23/2022		
Name of Reporting Company Silverado Spur Inc., Wild Bill's Guns Too					
Full Name and Position of Person Making Report (Please print)			Telephone Number		
Joan Ceccarini (Treasurer)			775-434-7125		
Date			07/12/2022		
Email Address of Shipper or Person Making Report joohi143@hotmail.com		Signature of Person Making Report 			
Firearm(s) Description (Use ATF Form 3310.114 Continuation Sheet if additional space is needed)					
Type	Manufacturer	Model	Caliber	Serial Number	Date Acquired
Handgun	Glock	23 (Gen 3)	.40	BAEA057	04/22/2022
Handgun	Glock	20 (Gen 4)	10mm	8BLS897	04/22/2022
Handgun	Glock	19 (Gen 5)	9mm	BFZD028	04/22/2022
Handgun	Glock	19 (Gen 5)	9mm	ACV8342	04/22/2022
<input type="checkbox"/> Some or all of the stolen missing inventory listed above falls within the purview of the National Firearms Act (NFA)					

<sup>7</sup> Investigators learned that FaxZero requires customers to provide an email address. FaxZero then sends a confirmation email to that email address that includes a verification link, on which the customer must click to activate the service. This confirms that the user has provided a working email address to which the customer has access.

1           50.     FBI investigators contacted the employee listed on the form as the reporting party. The  
2 employee indicated that she had not made any such report and that the signature was not hers. Further  
3 investigation revealed that two of the four firearms on the form had been sold to Wild Bill's Guns Too,  
4 on June 9, 2022, by **Anton Iagounov**. Interviews with Wild Bill Gun's employees indicated that these  
5 guns had not been put up for sale yet, however. According to the employees, this means that the only  
6 people who would have known the guns were in the store's possession—and therefore the only people  
7 who would have had the information to put it on the form—were Wild Bill Gun's employees, who  
8 would have no reason to falsify such a form, and **Iagounov**.

9           51.     A duplicate copy of the Shipment Theft/Loss form was also sent via FaxZero to the ATF  
10 from a different email address: **usmcman\_00@proton[.]me**. Records obtained through a subpoena to  
11 PayPal show that **Iagounov** made monthly payments to Proton Technologies AG, and Proton Research  
12 Incorporated, from April 2021 to April 2022 (the month investigators served the subpoena on PayPal).  
13 Proton Technologies AG and Proton Research Incorporated are virtual private network and encrypted  
14 email providers that issue email addresses with the domain **proton[.]me**.

15           52.     Returns from the subpoena served on FaxZero also showed that the user with access to  
16 the email address **usmcman\_00@proton[.]me** had sent or attempted to send ten faxes on July 29, 2022,  
17 in the name of a particular ATF agent. The fax's cover page also contained the agent's name in the  
18 signature block, as well as the agent's real contact information. A document titled  
19 "thetoffirearms\_interstate.pdf" was included in the fax. When interviewed, the ATF agent confirmed  
20 she had not sent the faxes.

21           53.     FaxZero records also indicated that, on August 19, 2022, a user with email address  
22 **yjofwviq@candassociates[.]com** and IP address **77.111.246.40** sent or attempted to send a fax to xxx-  
23 xxx-5054, a fax number associated with a public school in New York state. The cover page text  
24 contained the message, "A tactical thermonuclear bomb is set to go off at your location at noon today.  
25 You have been warned."

26           54.     A user with the same email address, **yjofwviq@candassociates[.]com**, and the same  
27 IP address, **77.111.246.40**, also attempted to send a fax to a publicly-listed fax number for Edwards Air  
28 Force Base xxx-xxx-2732, with a cover page stating, "There is a bomb set to go off at your

1 establishments at noon today. You have been warned to stay out of the middle-east and have failed to  
2 obey the will of Allah. Time for you American pigs to pay for your wars” (sic).

3 55. Investigators also learned from the FaxZero records that IP address 77.111.246.40 was  
4 used to send faxes from the email address **alvin.ch@proton[.]me**. This is the email address from which  
5 **Iagounov** transmitted the counterfeit search warrant to U.S. Capitol Police and the false Shipment  
6 Theft/Loss Form to the ATF. Through these means, agents have been able to confirm further that  
7 **Iagounov** is the source of these false and counterfeit documents.

8 **III. AUTHORIZATION REQUEST**

9 56. Based on the foregoing, there is probable cause to believe that Anton Andreyevich  
10 **Iagounov** has violated 18 U.S.C. § 912, False Personation of an Officer or Employee of the United  
11 States on multiple occasions. I therefore request respectfully that the Court authorize a criminal  
12 complaint and arrest warrant for his apprehension.

13 **IV. REQUEST FOR SEALING**

14 57. I further request that this Court issue an order sealing, until further order of the Court, all  
15 papers submitted in support of the criminal complaint and arrest warrant, including this application and  
16 affidavit, as well as the arrest warrant itself. These documents discuss an ongoing criminal investigation  
17 that is neither public nor known to all of the targets of the investigation. Based on my training and  
18 experience, I know that criminals actively search for criminal affidavits and warrants via the internet and  
19 disseminate them to other criminals as they deem appropriate, e.g., post them publicly online.  
20 Premature disclosure of the contents of this affidavit and related documents may have a significant and  
21 negative impact on the continuing investigation and may severely jeopardize its effectiveness, including  
22 by causing co-conspirators to flee, destroy or otherwise alter evidence, or to notify confederates.

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 Accordingly, there is good cause to seal these documents. I therefore request that the Court order that  
2 all papers in support of this application, including the affidavit and Criminal Complaint, sealed, until  
3 **Iagounov** is arrested and appears for his initial appearance.

4 I declare under the penalty of perjury that the foregoing is true and correct, to the best of my  
5 knowledge and belief.

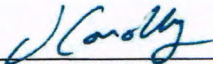
6 Respectfully submitted,

7 

8 \_\_\_\_\_  
9 David D. Hume  
10 Special Agent, FBI

11 Subscribed and sworn to me by telephone on: 3/8/24

12   
13 \_\_\_\_\_  
14 Hon. Carolyn K. Delaney  
15 U.S. MAGISTRATE JUDGE

16   
17 \_\_\_\_\_  
18 Approved as to form by  
19 AUSA JAMES R. CONOLLY  
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