

Koller

**U.S. v. Paul Michael Combs
Case No. 2:07cr00387
District of Utah, Central Division**

Copy this



PROFFER OF FACTS REGARDING INDICTMENT

In brief summary fashion, some of the facts underlying the criminal indictment issued by a grand jury in the above-captioned case are as follows:

On September 15, 2006, Egor Chernov, a resident of Lehi, Utah, filed a complaint with the Lehi City Police Department stating that defendant Paul Combs, a former business associate, had left Chernov threatening phone messages, sent a threatening email, and made demands for cash. Specifically, in his written complaint, Chernov stated:

Mr. Combs began making demands for cash. I ignored these. Then veiled threats were included. Stories told over the phone about him [Paul Combs] "beating the crap out of [a business associate] until he paid", then accusations of me supposedly assaulting and poisoning [a different business associate] who visited Thailand. I made a decision to discontinue any type of communication with Mr. Combs. During my last contact with him I explained that if he had any questions with regard to the performance of his Russian partners, he should address them directly and if he was under the impression that I cheated him in any way, he should resolve the matter in a civil suit.

Instead I received a few threatening telephone messages where someone on behalf of "the Florida Boys" wants to exterminate my entire family and kidnap "little MC" (he refers to Michael Chernov, my 3 year-old son) and the attached e-mail message where he obviously uses the same threats of death, kidnapping, and slanderous accusations in order to extort money. He is demanding ridiculous sums of money (\$260,000,000) that in no way represent any investment he may have made and are [sic] simply not realistic for me. And in case of "misbehavior" he is threatening to kill me, my 3-year old son (who is a US citizen) and my parents.

I am very concerned for the safety of my family. Please let me know what I can do to protect them and where you might be able to assist me in doing so.

Chernov also provided the Lehi City Police Department with a threatening email message dated September 13, 2006, from email address FreesoftPC@aol.com, which Chernov said was from defendant Combs, a copy of which is attached.

At about the same time that Egor Chernov made his complaint to the Lehi City Police Department, Defendant Paul Combs contacted Special Agent Gregory Coleman of the Federal Bureau of Investigation to provide information about the alleged involvement of Chernov in the murder of a U.S. citizen named Rex Judd, as well as other illegal activity. SA Coleman began a dialogue with Combs that included both interviews and follow-up email communications. At the

time, SA Coleman was unaware of the contact Chernov had made with the Lehi City Police Department or the alleged threats Combs had made to Chernov.

Subscriber information obtained from America Online confirmed that Defendant Combs is the subscriber for the email address, FreesoftPC@aol.com.

On November 9, 2006, SA Coleman received an email from Defendant Combs stating that Combs would be traveling out of town beginning that upcoming weekend through Thanksgiving.

On November 13, 2006, SA Coleman received an email from another person, Charlie Flynn, stating that Combs was in Utah "with some buddies" looking for Chernov. SA Coleman responded the same day asking Flynn to keep him informed about Combs's activities. Immediately thereafter, SA Coleman sent an email to Combs in which he asked Combs to call him.

SA Coleman was not able to reach Defendant Combs before SA Coleman received a call on November 15, 2006, from a special agent in the FBI office in Provo, Utah. The FBI agent informed SA Coleman that there had been an incident on November 15, 2006 shortly after 4:00 a.m. at 893 East Utah Highlands Drive, Lehi, Utah, which was the home of Egor Chernov, his wife, Lisa Dajany Chernov, and their two young children, Michael and Sara, who were both less than four years old. SA Coleman was informed that a security camera at the home captured images of two individuals who were vandalizing the home. Various phrases were spray painted in orange paint on the house and property, including "Egor Chernov murdered Rex Judd!" and "Russian Maggot!" and "Russian Thief" and "Hello! Lisa Michael Sara!" SA Coleman was informed that a knife was left sticking in the front door frame with a religious cross necklace hanging from it.

Business records provided by Southwest Airlines and the Hertz Corporation reveal that on November 12, 2006, Defendant Paul Combs flew from the Fort Lauderdale-Hollywood International Airport, which is located near his residence in Davie, Florida, to the Salt Lake City International Airport. Combs rented a car at the Salt Lake City International Airport on the same day. On November 15, 2006 at 5:55 a.m., Combs returned the rental car shortly thereafter boarded a departing Southwest Airlines flight which departed at 7:20 a.m. bound for Columbus, Ohio.

On November 27, 2006, Egor Chernov and his wife, Lisa Dajany Chernov, submitted to an interview at the Lehi City Police Department. During the interview, Chernov reviewed another email with the Lehi Police which Chernov said he had received from Combs. The email was dated November 22, 2006 and contained the caption "The Russian Maggott" in the subject line. A copy of that email is attached.

During the interview Chernov also showed the police detectives an electronic copy of a photograph on his laptop computer depicting Defendant Paul Combs standing in a swimming pool. Chernov told the police detectives that in the picture Combs was wearing the same religious cross necklace as the one that had been hanging on the knife that was found stuck to Chernov's front door at the time of the vandalism. A review of the photograph of Combs in the swimming pool reveals

that the religious cross necklace Combs is wearing in the photograph appears similar to the necklace, and may be the same necklace, that was recovered by the Lehi City Police Department hanging on the knife stuck in Chernov's front door.

Chernov provided the FBI with an affidavit by Egor Chernov's sister, Marina M. Gorbacheva, which was purported to be signed by her on November 24, 2006, in Phuket, Thailand. That affidavit contains a photograph of a religious cross necklace which appears to be identical to the one recovered by the Lehi City Police Department at the Chernov residence. Marina Gorbacheva states under penalty of perjury that the picture depicts the cross that she presented to Paul Combs during one of her trips to Thailand in 2005.

On November 27, 2006, Defendant Combs sent an email to SA Coleman in which he stated, "I've been traveling quite a bit, and was actually out west for a couple of days, and left a pretty strong message for the Russian Maggot. I then went on to Ohio, only because it is almost Communist to miss the OSU vs UM game."

In subsequent emails to SA Coleman and another person, Charlie Flynn, Defendant Combs made apparent quips about the spray painting incident at Egor Chernov's home by assuming the names, and derivatives of names, of various famous painters. For instance, in an email to SA Coleman, Combs described the Chernov residence as "the house that was once visited by Picasso." Thereafter, in emails to Flynn, Combs referred to himself alternatively by combining his nickname of "Ug" or "Ugster" to form the names "Ug-Gogh," "Ugster-Brandt," and "Ug-BrandtGoghCasso."

On December 22, 2006, Defendant Combs sent Flynn an email stating, "I have a few of the boys scheduled to stop by to see some of that Southwestern Desert Deco Artwork, and say hello, over the holidays. I told them to look under every rock, because little Maggots don't like the sun."

On January 3, 2007, Defendant Combs sent another email to Flynn referencing the investigation being conducted by SA Coleman (referred to as "the GC") and stating, "As far as the GC goes, by now I would think he has seen more than his fair share of Bullshit. Plus, he is in the later stages of his 20 year deal, so hopefully he will crush this little maggot soon. And, before I get too impatient. My artistic, creative abilities can show their ugly faces at anytime. I might just change Big Red to Big Black, on [sic] of these days."

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FILED IN UNITED STATES DISTRICT
COURT, DISTRICT OF UTAH
JUN 14 2007
BY D. MARK JONES, CLERK
DEPUTY CLERK

SEALED

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

vs.

PAUL MICHAEL COMBS,
a/k/a Aleksandar Stanislavov
Karanikolov, a/k/a/ Michael Wood(s),
a/k/a Ug, a/k/a Picasso, a/k/a Ug-Gogh,
a/k/a Ugster-Brandt, a/k/a Ug-
BrandtGoghCasso,

Defendant.

INDICTMENT

VIOLATION:
18 U.S.C. § 1951 (Extortion)

Case: 2:07cr00387
Assigned To : Cassell, Paul G.
Assign. Date : 6/14/2007
Description: USA v

The Grand Jury charges:

GOVERNMENT
EXHIBIT
CASE
NO. 07-6247-855
EXHIBIT
NO. 1

COUNT I

From in or about September 2006, and continuing to in or about January 2007, in the Central District of Utah and elsewhere,

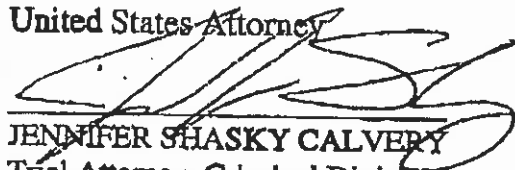
PAUL MICHAEL COMBS,
a/k/a Aleksandar Stanislavov Karanikolov,
a/k/a Aleks Karanikolov, a/k/a Michael Wood(s),
a/k/a Ug, a/k/a Picasso, a/k/a Ug-Gogh,
a/k/a Ugster-Brandt, a/k/a Ug-BrandtGoghCasso,

the defendant herein, did knowingly and intentionally attempt to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, by extortion, in that the defendant attempted to obtain property, that is, cash or substitute real property, from E.C., with his consent, which consent was to be induced by the wrongful use of actual and threatened force, violence, and fear, all in violation of Title 18, United States Code, Section 1951.

A TRUE BILL:


FOREPERSON OF THE GRAND JURY

BRETT L. TOLMAN
United States Attorney


JENNIFER SHASKY CALVERY
Trial Attorney, Criminal Division
U.S. Department of Justice

GREGORY C.J. LISA
Trial Attorney, Criminal Division
U.S. Department of Justice

Florida D.A.V.I.D. Driver License Transaction Page

Page 1 of 1

STATE OF FLORIDA
Department of Highway Safety & Motor Vehicles
Driver And Vehicle Information Database (DAVID)

DIGITAL IMAGES ARE RESTRICTED TO LAW ENFORCEMENT USE PURSUANT TO S. 322.142(4), FLORIDA STATUTES - IMAGES INCLUDE PHOTOGRAPHS AND SIGNATURES

Driver License Transaction Page

Driver License Transaction on 10-08-04



DL/ID Number [REDACTED] Class E

PAUL M COMBS
1521 SW 119 TR
FT LAUDERDALE, FL 33325-0000

[REDACTED] Sex M Height 6'00

Restrictions [REDACTED] Endorsements [REDACTED]

Fingerprint on file None

Issue Date 11-13-03 Issue Time 08:18:08

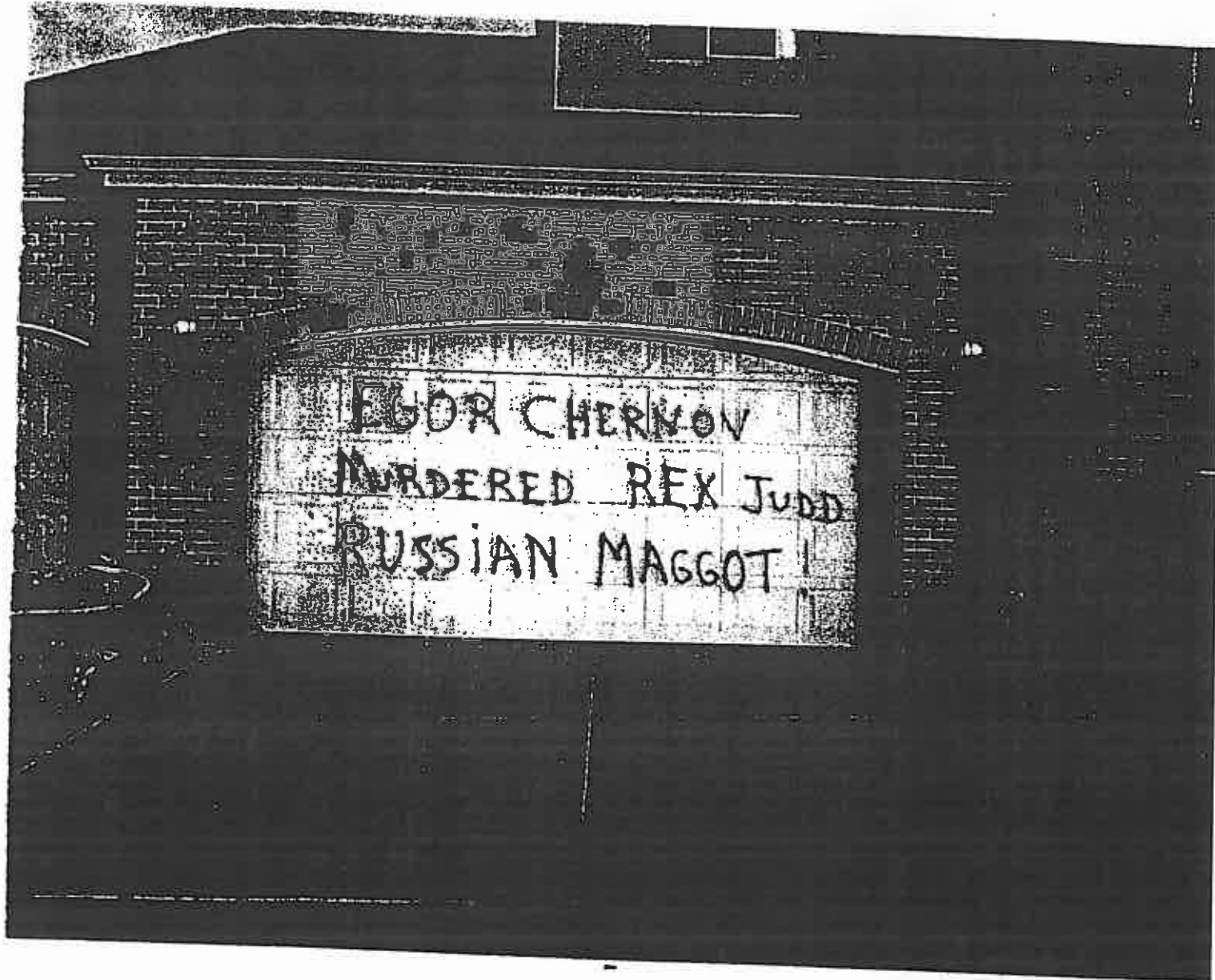
[REDACTED] Duplicate Date 10-08-04

Form Number [REDACTED]

Conditional Messages: **SAFE DRIVER**

Associated Application | Older |

GOVERNMENT EXHIBIT
CASE NO. 07-6247-BSS
EXHIBIT NO. 2



**GOVERNMENT
EXHIBIT**

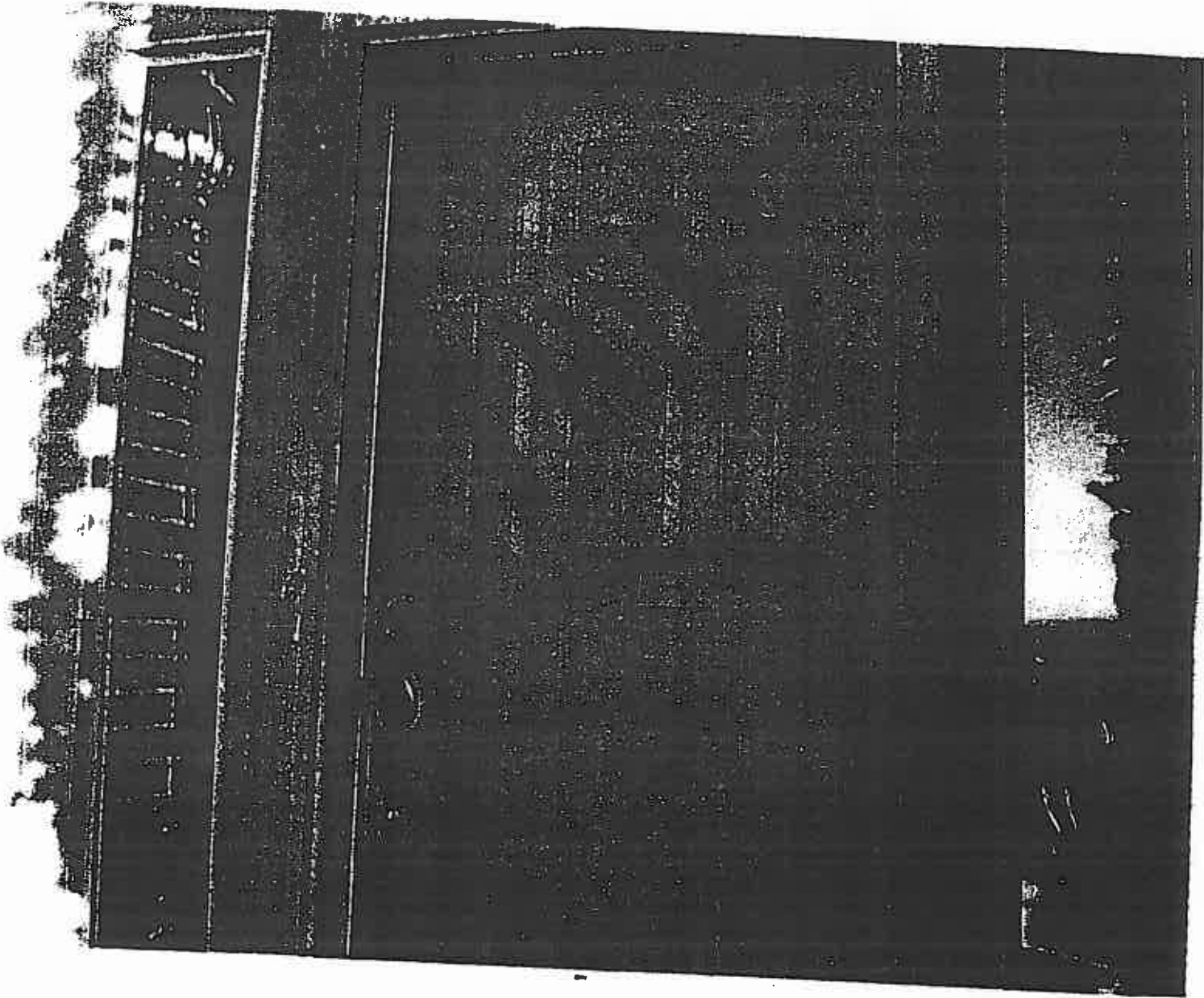
CASE
NO. 07-10247-BSS

EXHIBIT
NO. 4A

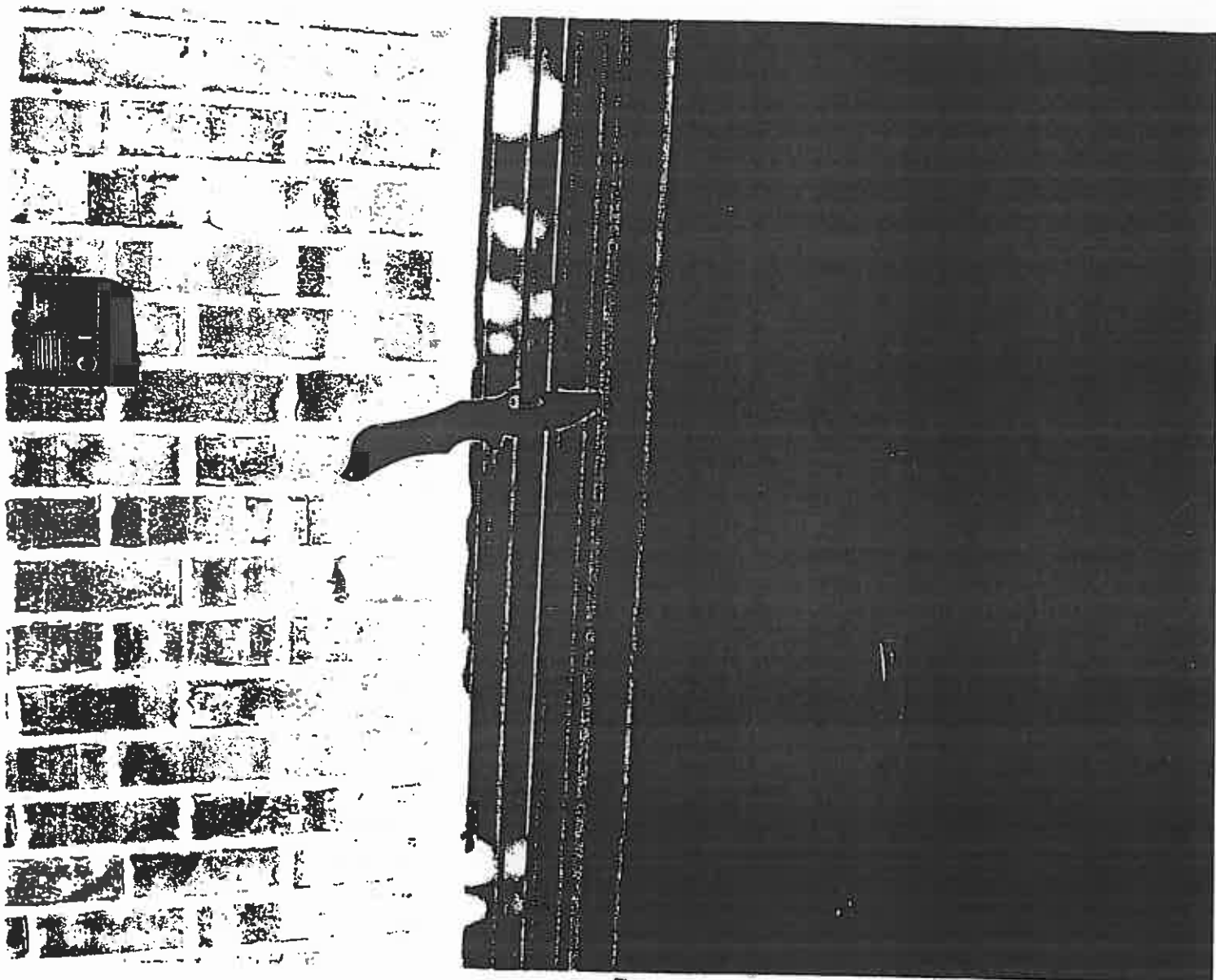
HELMUT G.
VISA MICHAEL
NIGGER
SARA

EGC
MURD
RUS

GOVERNMENT
EXHIBIT
CASE NO. 07-12345
DATE 06/27/07
BY [Signature]



GOVERNMENT EXHIBIT	
CASE NO.	<u>07-6247-BSS</u>
EXHIBIT NO.	<u>4C</u>



**GOVERNMENT
EXHIBIT**

CASE
NO. 07-6247-BSS

EXHIBIT
NO. 4D



GOVERNMENT EXHIBIT	
CASE NO.	<u>07-6247-BSS</u>
EXHIBIT NO.	<u>4E.</u>



**GOVERNMENT
EXHIBIT**

CASE
NO. 07-6247-BSS

EXHIBIT
NO. 4F

NOV-27-2006 16:41

P.04/12

COPY

E. Chernov

From: FreesoftPC@aol.com
Sent: Wednesday, September 13, 2006 10:14 PM
To: egorc@yahoo.com; black@ssbdconsulting.com; accounts@ssbdconsulting.com; ec@katamaibay.com; ec@banyanhoma.com; Chernov@gmail.com
Subject: Dr. Doom - The Maggot

Egor Chernov,

This will be your last opportunity to repay us. If I have not received a wire in full, within 48 Hrs, I am going to CRUSH YOU. Your life as you know it, will be over. I already have everything in place, to do so, and will initiate the beginning of the end for you, immediately.

First, you will see direct contacts, in person, made with at least 100 people that you know, and do business with. The list will include David Edwards & Peter Notley & Katamunda Staff, Lord Alex Montagu, Peter Morone & Associate, CDFlynn & Lisa & his boys, Joe Eberhart & Jim Lewis & Jim, for JTE Finanz & Taurus Trust, DBS Vickers COO & Staff, The SEC in US, The Texas Gents you robbed, Scot Vanderweel you robbed, Laura Judd & Family, Adam Grimshaw, Mark Winter, The Bailey's, Mark, Shawn Christopher, Dan Albrecks in Vegas, Jeffrey Bruyell, Steve Dewherst, Jim Inklebarger, Phil & Partners, Clay, Jim, Gunther, Reggie, Juan, Rob, Mo, Hernando, Ted, Carlos, Sandy Glicksman, Vladimir Agapov, it's all here. All Attorneys-Pensit Attorneys, Horwath Philippides Attorneys, Panellas Trading, All Banks- Central Bank of Cypress, Thailand Banks, Russian Banks, US/ Utah & Nevada Banks. Every Hotel Property & Staff like The Hyatt's, The Peninsula, The Shangri-La, and many others. Your Family, on both sides, including the Dajany's. The list goes on & on. EVERYONE will be "PUT ON NOTICE" that they might be ACCOMPLICES.

Topics will include:

1. Pre-Meditated Murder
2. Attempted Murder
3. Fraud
4. Tax Evasion
5. Theft
6. Drugging People
7. Illegal Companies
8. Illegal Transfers - Albina
9. Illegal Passports - Immigration
10. Illegal Credit Card Accounts
11. Many other illegal acts.....

After this has been initiated, and everyone knows who you are, I am going to hunt you down. I know you are not able to defend yourself or your family. I will have you or MC brought to me, because I want to look in your eyes. I already know what I will see.

You have 2 days to comply. I will not ask you again.

Govern Yourself Accordingly

GOVERNMENT EXHIBIT
CASE NO. <u>07-1247-BSS</u>
EXHIBIT NO. <u>3</u>

NDU-27-2006 16:40

P.02/12

Mark, HI

I have just received this from Scott Vanderweel. I have not heard from this guy in quite a while! I assume he is quite worked up by Paul Combs and they are thinking they are getting away with this. I think Lisa can give you lot of insight on this guy and his wife.

About ready to get on the plane here. Hope all is well.

Egor

----- Forwarded Message

From: <svanderweel@aol.com>

Date: Fri, 24 Nov 2006 12:22:16 -0500

To: <egorc@yahoo.com>, <black@ssbdconsulting.com>, <Chernov@tmall.com>, <accounts@ssbdconsulting.com>, <ec@banyanhome.com>, <ec@katamalbay.com>, <alpha@trigate.org>

Cc: <FreesoftPC@aol.com>, <cdflynn@hotmail.com>, <cedarsmom@juno.com>

Subject: Fwd: The Russian Maggot

COPY

Egor,

You will need to wire me all my money that you stole from me as well. I will be a nice guy and give you until Nov, 30th. If I don't here from you by then, I guess Paul and I will see you at your party. Sounds like it's going to be a very nice party with lots of nice people there and you're going to be the center of attention just the way you like it. However, if your not in the mood for a party and that yucky feeling that often follows such a wild event, then, I suggest that you wire my money that you took from me on time.

Hope to see you soon,

Happy Holidays

SV

Oh, PS.

Do you still want to meet in Ireland to retrieve Rex's safe deposit box? Please send tickets and money for the trip and I will meet you there with Paul.

----- Original Message

From: FreesoftPC@aol.com

To: egorc@yahoo.com; black@ssbdconsulting.com; Chernov@tmall.com; accounts@ssbdconsulting.com; ec@banyanhome.com; ec@katamalbay.com; alpha@trigate.org

Cc: FreesoftPC@aol.com; cbaynham@earthlink.net; JKHAPP@aol.com; cdflynn@hotmail.com; cflynn@novuscom.net; svanderweel@hotmail.com; SVanderWeel@aol.com; Lmontymont@aol.com; PhilG@yahoo.com; scott@championcp.com; adamwgrimshaw@yahoo.com; jlewisatty@hotmail.com; jrb@indocan.com

Sent: Wed, 22 Nov 2006 1:48 PM

Subject: The Russian Maggot

Egor Chernov,

aka: Dr. Doom,

aka: Russian Pussy Maggot Thief,

1. I think by now, just about everyone knows you MURDERED your buddy Rex Judd, and that I was with you when you did it. I'm sure all your neighbors know!
2. I think everyone knows you tried to MURDER your buddy Charlie Flynn. But of course you were with that little inbred maggot, Brother-in-Law of yours, Alex Gorbachev, and he wasn't smart enough to work a Taser on Charlie. This was only after I stopped you from MURDERING he and Lisa (His Wife), 2 months earlier.
3. I think most people know you sent a Hit man, to MURDER Lord Nutsock, and his children, in the beginning of December, 2006, from your living room, in your house in Phuket. And again, I was with you, and who would know he would be detained for 2 days, in Vegas, and then get shipped back to Thailand.
4. I think most people know you tried to lure Scot Vanderweel to Singapore, to MURDER him, after you robbed him, and killed his neighbor Rex Judd.
5. I know these are all very small concerns for you, in comparison, to the FUN you and I will have shortly.
6. The next time I stop by your house, to see you and your family, I won't be with Picasso. I will be some of my buddies that are very excited to have a CHAT with you. I promise I will teach you a LESSON, that nobody will ever forget.
7. It is 10:00 Pacific Time right now, on Nov. 22, 2006. If I don't hear back from you, and have my money, by 5:00 Pacific Time, on Nov. 24, 2006. I will consider you just another Little Russian Cunt, that likes to steal from his mates.

GOVERNMENT EXHIBIT

CASE NO. 07-6247-BSS

EXHIBIT NO. 5

NOV-27-2006 16:48

P.03/12

B. Either wire back my cash, with interest, or start signing over properties to my company. You can start with the following properties, and I will tell you when to stop:

A. 893 Utah Highlands Drive, Lehi, UT 84043... HM # 801-766-8277
(Make sure to clean all excess orange paint off stone walls)

B. Albira Villa, Katamunda, Phuket, Thailand

C. 4531 Hummelstrasse, SLC, UT. (Get rid of all 8 cars & vans in driveway)

D. 230 Broadway, SLC, UT

E. 201 South Temple, SLC, UT

F. 60 & 90 - 780, American Fork, UT, 84003 (Even though they are very small).

G. 280 Flamingo, Vegas

H. 5750 - 900 SLC, UT 84121 - David D.

I. 3700 Las Vegas Blvd, NV, 89101 - John & Marge

J. 2248 - 3650, SLC, UT 84119 - Sam

K. Sharif & Nanette - Both places in American Fork, UT.

Happy Thanksgiving!

Ug

PS.... Charlie, Please copy the Retarded, Drunken, Low-Life, Bailey Brother...Maggots.

Check out the new AOL <http://pr.stvola.com/promoclk/1615326657x4311227241x4298082137/aol?redir=http%3A%2F%2Fwww%2Eaol%2Ecom%2Fnewaol%2E> . Most comprehensive set of free safety and security tools, free access to millions of high-quality videos from across the web, free AOL Mail and more.

----- End of Forwarded Message