

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

FEDERAL TRADE COMMISSION
and STATE OF GEORGIA,

Plaintiffs,

v.

LAPTOP & DESKTOP REPAIR, LLC,
a Nevada limited liability company, also
d/b/a cashforiphones.com,
cashforlaptops.com, ecyclebest.com,
smartphonetraders.com, sell-your-
cell.com; and VADIM OLEGOVICH
KRUCHININ, also a/k/a Vadim
Kruchin, David Kruchin, David Vadim
Kruchin, Dave Kruch, as the owner and
an officer of Defendant Laptop &
Desktop Repair, LLC,

Defendants.

Case No. 1:16-CV-3591-AT

**MOTION FOR ARREST WARRANT, INCARCERATION, AND SEIZURE
OF THE PASSPORTS OF DEFENDANT VADIM OLEGOVICH
KRUCHININ, TO COERCE COMPLIANCE WITH THE COURT'S PRIOR
ORDERS**

Plaintiffs Federal Trade Commission ("FTC") and State of Georgia respectfully move this Court for an order authorizing the detainment, arrest, incarceration, and the seizure of passports and other official travel documents of

Defendant Vadim Olegovich Kruchinin a/k/a David Kruchin (“Kruchinin”) as a non-punitive sanction for the Court’s previous finding of contempt, and to coerce compliance with the temporary restraining order (Doc. 9) (“TRO”), the stipulated preliminary injunction (Doc. 14) (“PI”), and the Court’s prior *Order of Civil Contempt Against Defendants* (“Contempt Order”) (Doc. 27).

For the reasons set forth in the Plaintiffs’ contemporaneously filed *Memorandum in Support*, the Court should issue an Order directing:

1. The Court Clerk to issue an arrest warrant for Defendant Kruchinin;
2. The United States Marshals Service and all other federal, state, and local law enforcement agencies and officers, and INTERPOL and other foreign law enforcement agencies, to detain and arrest Defendant Kruchinin;
3. The arresting entity to seize all passports and travel documents issued to, and in the possession of, Defendant Kruchinin;
4. The United States Department of State to cancel any passport and travel document issued to Defendant Kruchinin;
5. Defendant Kruchinin to be incarcerated until such time that he fully complies with the following provisions of the Court’s prior Contempt Order (Doc. 27), or until the Court orders otherwise:

- A. Remit to the Receiver all funds that were transferred or concealed in violation of the TRO and PI, repatriate Defendants' monies located overseas, provide an accurate and complete accounting of their assets, and fully cooperate with the Receiver as ordered;
 - B. Turn over all funds and assets that were concealed or transferred in violation of the asset freeze to the Receiver;
 - C. Confer and agree with counsel for Plaintiffs to appear on specific dates, at specified locations and times, for depositions in order to provide sworn statements concerning the existence and location of their assets;
 - D. Provide all computer log-ins and passwords as requested by, and as needed for, the Receiver to fulfill its duties under the TRO and PI, and;
6. Defendant Kruchinin to be incarcerated until such time that he substantially complies with the following, or until the Court orders otherwise:
- A. Provide a full accounting of all monies removed from accounts covered by the asset freeze, including: (i) the location of the money, or (ii) if spent in an arm's length transaction, when it was spent, for

whose benefit it was spent, what was purchased, from whom it was purchased, and copies of any invoices or records concerning the expenditure.

Respectfully submitted,

December 7, 2016

DAVID C. SHONKA,
Acting General Counsel

/s/ Anna M. Burns

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STATE OF GEORGIA

CERTIFICATE OF SERVICE

I hereby certify that on December 7, 2016, I electronically filed the foregoing *Motion* with the Clerk of the Court using *CM/ECF*. I also certify that the foregoing document is being served on all parties and the persons identified below via transmission of Notice of Electronic Filing generated by *CM/ECF*, which will automatically send e-mail notification of such filing to the counsel of record, or by causing it to be sent via First Class Mail.

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