	Case 2:20-cr-00254-JAD-EJY D	ocument 1 Filed 09/16/20 Page 1 of 15			
1	NICHOLAS A. TRUTANICH	FILED RECEIVED			
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3	Nevada Bar Number 13644 JESSICA OLIVA	SEP 16 2020			
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7	Attorneys for Plaintiff The United States of America				
8	UNITED STATES DISTRICT COURT				
9	DISTRIC	F OF NEVADA			
10	UNITED STATES OF AMERICA,	CRIMINAL INDICTMENT			
11	Plaintiff,				
12	VS.	Case No.: 2:20-cr- 254			
13	ARMEN MAGZANYAN,	VIOLATIONS:			
14	aka "Arman Magzanyan," aka "Arman Magz,"	18 U.S.C. §§ 1341, 2 – Mail Fraud;			
15	Defendant.	18 U.S.C. §§ 1347, 2 – Health Care Fraud; and			
16		18 U.S.C. §§ 1957, 2 – Monetary			
17		Transactions in Criminally Derived Property.			
18					
19					
20	THE GRAND JURY CHARGES THAT	:			
21	INTRODUCTO	RY ALLEGATIONS			
22	1. From in or around Novembe	er 2014 through in or around December 2015,			
23	ARMEN MAGZANYAN, also known as	"Arman Magzanyan" and "Arman Magz"			
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hereinafter "MAGZANYAN"), defendant herein, with others known and unknown to the
 Grand Jury, operated the company GR8SLEEP.CM d/b/a Las Vegas Sleep Lab
 (hereinafter "LVSL") in Nevada.

LVSL claimed to conduct (among other services) monitored sleep studies. A
 properly conducted monitored sleep study is a medical diagnostic procedure in which a
 patient's breathing, heartrate, and other vital signs are monitored while the patient sleeps.
 The purpose of a monitored sleep study is to determine whether the patient suffers from
 sleep disorders such as sleep apnea.

9 3. At all time relevant to this indictment, Health Insurance Company 1 was a
10 health care benefits company offering health insurance products.

4. At all times relevant to this indictment, Health Insurance Company 1 had an
 agreement with a student scholarship program of the Ministry of Education of a foreign
 nation, under which students from that nation studying throughout the United States were
 insured through a health care benefits plan provided by Health Insurance Company 1. This
 plan, hereinafter the "Student Plan," was a healthcare benefits program which affected
 interstate commerce and which provided medical benefits, items, and services to those
 covered students.

18 5. At all times relevant to this indictment, Bank 1 was a U.S. financial services
19 company offering, among other services, business and personal bank accounts.

20 6. At all times relevant to this indictment, Bank 2 was a regional financial
21 services company.

22 7. At all times relevant to this indictment, Title Insurance Company 1 was a
23 title and escrow services company with locations in Southern Nevada.

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8. At all times relevant to this indictment, Car Dealer 1 was a Las Vegas-based
 luxury vehicle retailer.

9. At all times relevant to this indictment, Individual 1 was a relative of MAGZANYAN.

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LVSL

6 10. From on or about August 17, 2015 through on or about December 12, 2015,
7 LVSL submitted approximately \$5,211,400 worth of claims to the Health Insurance
8 Company 1, in which LVSL claimed to have performed 867 monitored sleep studies and to
9 have provided 1 item of durable medical equipment at an office on East Desert Inn Road in
10 Las Vegas, NV.

11 11. LVSL did not in fact perform any of these services for which it claimed
12 reimbursement from Health Insurance Company 1.

13 12. Of these 867 sleep studies claimed, LVSL's claims stated 859 were performed
14 on patients who all were members of the same health insurance plan: the Student Plan. The
15 students on whose behalf LVSL submitted claims were primarily young men, and they
16 were attending school throughout the United States.

17 13. LVSL claimed reimbursement for at least two monitored sleep studies for
18 each of these students, and in many instances claimed reimbursement for four or more
19 monitored sleep studies per student.

14. In reimbursement of these claims, Health Insurance Company 1 paid a total
of approximately \$1,888,146.70 between on or about August 22, 2015 and on or about
December 17, 2015. Health Insurance Company 1 paid a total of approximately
\$1,862,941.70 directly to LVSL through 23 checks which it mailed to LVSL in Las Vegas,
Nevada.

1 15. MAGZANYAN endorsed with his signature each of these 23 checks and 2 deposited them into a Bank 1 account ending in 5069 between on or about October 5, 2015 3 and on or about March 14, 2016. MAGZANYAN was the only authorized signatory for 4 this account.

COUNTS ONE TO THREE Mail Fraud (18 U.S.C. §§ 1341, 2)

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16. The allegations in paragraphs 1 through 15 are realleged and incorporated as though fully set forth in this count.

17. From a date unknown but no later than on or about August 17, 2015 through a date unknown but no earlier than on or about March 14, 2016, in the State and Federal 10 District of Nevada and elsewhere, 11

ARMEN MAGZANYAN, aka "Arman Magzanyan" aka "Arman Magz."

14 defendant herein, and others known and unknown to the grand jury, participated in and 15 devised and intended to devise a scheme and artifice to defraud and for obtaining money 16 and property by means of materially false and fraudulent pretenses and representations. 17 18. The purpose of the scheme and artifice to defraud was to obtain payment 18 from Health Insurance Company 1 by causing LVSL to submit false claims for sleep 19 studies and related devices allegedly rendered to patients who had Health Insurance 20 Company 1 health insurance policies. In fact, LVSL did not provide the claimed services 21 and devices and thus was not entitled to receive payment.

22 19. On or about the dates below, in the State and District of Nevada, for the 23 purpose of executing and attempting to execute the above-described scheme and artifice to 24 defraud and deprive, the defendant and others known and unknown to the grand jury,

aiding and abetting each other, knowingly caused to be delivered by mail according to the direction thereon the following matter, with each mailing constituting a separate violation of Title 18, United States Code, Sections 1341 and 2.

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4 **ON OR** COUNT **DESCRIPTION OF MAILED ITEM** ABOUT 5 ONE Check for \$105,861 made payable to LVSL 09/24/2015 6 TWO 11/12/2015 Check for \$247,009 made payable to LVSL 7 12/03/2015 Check for \$383,116 made payable to LVSL THREE 8 **COUNTS FOUR TO SIX** 9 Health Care Fraud (18 U.S.C. §§ 1347, 2) 10 20. The allegations in paragraphs 1 through 19 are realleged and incorporated as 11 though fully set forth in this count. 12 21. From a date unknown but no later than on or about August 17, 2015 through 13 a date unknown but no earlier than on or about December 12, 2015, in the State and 14 Federal District of Nevada and elsewhere, 15 **ARMEN MAGZANYAN** 16 aka "Arman Magzanyan" aka "Arman Magz." 17 18 defendant herein, and others known and unknown to the grand jury, knowingly participated in and devised and intended to devise a scheme and artifice to defraud and for 19 obtaining money and property owned by and under the custody and control of a health 20 care benefit program by means of materially false and fraudulent pretenses and 21 representations in connection with the delivery of and payment for health-care benefits, 22 items, and services. 23 24

22. The purpose of the scheme and artifice to defraud was to obtain payment
 from the Health Insurance Company 1 by causing LVSL to submit false claims for sleep
 studies and related devices allegedly rendered to patients who had health insurance under
 the Student Plan. This plan was a health care benefit program as defined in Title 18, United
 States Code, Section 24(b). In fact, LVSL did not provide the claimed services and devices
 and thus was not entitled to receive payment under the plan.

7 23. On or about the dates below, in the State and District of Nevada and
8 elsewhere, the defendant and others known and unknown to the grand jury, aiding and
9 abetting each other, knowingly, willfully, and with the intent to defraud, executed and
10 attempted to execute the above-described scheme by submitting and causing to be
11 submitted the following false and fraudulent claims for sleep study testing purportedly
12 provided to the individuals identified below, with each submission constituting a separate
13 violation of Title 18, United States Code, Sections 1347 and 2.

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14 15	COUNT	APPROXIMATE DATE OF SUBMISSION	CLAIM ID	CLAIMED DATES OF SERVICES	AMOUNTS OF CLAIMS	PATIENT
16 17	FOUR	09/21/2015	EPABPPTLS00	09/03/2015 09/14/2015	\$6,000 \$6,000	A.A.
18	FIVE	11/06/2015	EWPBPPQCN 00	10/27/2015 11/01/2015	\$6,000 \$6,000	A.A.
19 20	SIX	11/25/2015	EVJLPZKZV00	11/14/2015 11/18/2015	\$6,000 \$6,000	A.E.
21	t aan	•	•	·	•	• • • • • • • • • •

COUNTS SEVEN TO FIFTEEN

Monetary Transactions in Criminally Derived Property (18 U.S.C. §§ 1957, 2)

24. The allegations in paragraphs 1 through 23 are realleged and incorporated as
 though fully set forth in this count.

3 25. On or about the dates set forth below, in the State and District of Nevada
4 and elsewhere,

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ARMEN MAGZANYAN, aka "Arman Magzanyan" aka "Arman Magz,"

defendant herein, and others known and unknown to the grand jury, aiding and abetting each other, did knowingly engage and attempt to engage in the following monetary transactions of a value greater than \$10,000 by and through a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, that is the transfer of funds, such property having been derived from a specified unlawful activity, that is, the scheme and artifice to defraud in violation of 18 U.S.C. §§ 1341 and 1347, alleged herein, and knowing that these transactions involved criminallyderived property, with each monetary transaction constituting a separate violation of Title 18, United States Code, Section 1957 and 2.

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17	COUNT	DATE OF TRANSFER	SOURCE ACCOUNT	CHECK/ REFERENCE NO.	AMOUNT	RECIPIENT
18	SEVEN	11/05/2015	Bank 1 5069	Ref. Number 151105084287	\$30,000.00	Title Ins. Company 1
9	EIGHT	11/10/2015	Bank 1 5069	Ref. Number 151110129889	\$75,251.64	Title Ins. Company 1
20	NINE	01/15/2016	Bank 1 5069	Check Number 1035	\$125,991.56	Car Dealer 1
	TEN	01/21/2016	Bank 1 5069	Check Number 1044	\$57,181.83	Bank 2
2	ELEVEN	02/01/2016	Bank 1 5069	N/A	\$12,064.57	Bank 1 Home Mortgage loan no. 0486118656
3	TWELVE	03/07/2016	Bank 1 5069	Check Number 1057	\$40,000.00	Individual 1
4	THIRTEEN	03/07/2016	Bank 1 5069	Ref. Number lbe2Ts14Ww	\$200,000.00	Arman Magzanyan
	FOURTEEN	03/15/2016	Bank 1 5069	Ref. Number 160315153329	\$600,000.00	Individual 1

1	FIFTEEN	05/02/2016	Bank 1 5069	Check Number 1087	\$120,050.25	Car Dealer 1
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3		FOR	FEITURE AL	LEGATION O	NE	
4		Mail Fraud, H	Iealth Care Fr	aud, and Money	Laundering	
5	1. T	he allegations co	ontained in Co	ounts 1-15 of this	Criminal Ind	lictment are
6	hereby realleged	2				
7	pursuant to 18 l					
8				elony offenses cl		unts 1-15 of this
9	Criminal Indict	-				
10		,	ARMEN MA	GZANYAN.		
11	ARMEN MAGZANYAN, aka "Arman Magzanyan"					
12	aka "Arman Magz,"					
13	defendant herein, shall forfeit to the United States of America, any property, real or personal, which constitutes or is derived from proceeds traceable to violations of 18 U.S.C.					
14						
15	§§ 1341 and 134	7, specified unl	awful activities	s as defined in 18	3 U.S.C. §§ 19	956(c)(7)(F),
16	involving a Fed	eral health care	offense as defi	ned in 18 U.S.C	. § 24, or cons	piracy to
17	commit such of	fenses:				
18	defendar	nt herein, shall f	orfeit to the U	nited States of A	merica, any p	roperty, real or
19	personal, which	constitutes or is	s derived from	proceeds tracea	ble to violatio	ns of 18 U.S.C.
20	§§ 1341 and 195	7, specified unl	awful activities	s as defined in 18	8 U.S.C. §§ 19	956(c)(7)(A) and
20	1961(1)(B), or a	conspiracy to c	ommit such of	fenses:		
21	an in personam	criminal forfeit	ire money jud	gment including	, but not limi	ed to, at least
22	\$1,862,941.70; a	and that the net	sale proceeds	of the following	property will	be applied
	towards the pay	ment of the mo	ney judgment:			
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a. 7808 GENZER DRIVE, LAS VEGAS, NEVADA 89145, LOT THREE
(3) IN BLOCK TEN (10) OF CHARLESTON RAINBOW UNIT NO.
17-A, AS SHOWN BY MAP THEREOF ON FILE IN BOOK 24 OF
PLATS, PAGE 34, IN THE OFFICE OF THE COUNTY RECORDER
OF CLARK COUNTY, NEVADA, AND AMENDED BY
CERTIFICATE OF AMENDMENT, RECORDED JUNE 14, 1979 IN
BOOK 1070 AS DOCUMENT NO. 1029899, OFFICIAL RECORDS,
CLARK COUNTY, NEVADA; TOGETHER WITH ALL
IMPROVEMENTS AND APPURTENANCES THEREON, APN: 138-33-513-002;

- b. 7208 GRAY STREET LAS VEGAS, NEVADA 89145, LOT SEVENTEEN (17) IN BLOCK FOUR (4) OF CHARLESTON RAINBOW UNIT NO. 10-A, AS SHOWN BY MAP THEREOF ON FILE IN BOOK 14 OF PLATS, PAGE 22, IN THE OFFICE OF THE COUNTY RECORDER OF CLARK COUNTY, NEVADA; TOGETHER WITH ALL IMPROVEMENTS AND APPURTENANCES THEREON, APN: 138-34-311-044;
- c. 9081 LAWTON PINE AVENUE, LAS VEGAS, NEVADA 89129, LOT TWENTY-EIGHT (28) IN BLOCK SEVENTEEN (17) OF GOWAN/FORT APACHE-PHASE 5-UNIT B, AS SHOWN BY MAP THEREOF ON FILE IN BOOK 70 OF PLATS, PAGE 3, IN THE OFFICE OF THE COUNTY RECORDER OF CLARK COUNTY, NEVADA; TOGETHER WITH ALL IMPROVEMENTS AND APPURTENANCES THEREON, APN: 138-08-222-023; and
- d. 2211 SOUTH TIOGA WAY, LAS VEGAS, NEVADA 89117,

PARCEL I: THAT PORTION OF THE SOUTHWEST QUARTER (SW 1/4) OF THE SOUTHWEST QUARTER (SW 1/4) OF SECTION 3, TOWNSHIP 21 SOUTH, RANGE 60 EAST, M.D.M., DESCRIBED AS FOLLOWS:

LOT TWO (2) OF THAT CERTAIN PARCEL MAP IN FILE 21 OF PARCEL MAPS, PAGE 31, IN THE OFFICE OF THE COUNTY RECORDER OF CLARK COUNTY, NEVADA, AND RECORDED AUGUST 28, 1978 IN BOOK 935 AS DOCUMENT NO. 894854, OFFICIAL RECORDS.

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22 PARCEL II: A NON-EXCLUSIVE EASEMENT FOR INGRESS AND
22 EGRESS OVER THOSE PORTIONS OF LOTS ONE (1), THREE (3)
23 AND FOUR (4) LYING WITHIN THE PRIVATE DRIVE AS
23 SHOWN BY SAID MAP; TOGETHER WITH ALL
24 IMPROVEMENTS AND APPURTENANCES THEREON, APN:
24 163-03-401-002.

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1	(all of which constitutes property).
2	3. If any property being subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C)
3	with 28 U.S.C. § 2461(c), as a result of any act or omission of the defendant:
4	a. cannot be located upon the exercise of due diligence;
5	b. has been transferred or sold to, or deposited with, a third party;
6	c. has been placed beyond the jurisdiction of the court;
7	d. has been substantially diminished in value; or
8	e. has been commingled with other property which cannot be divided without
9	difficulty;
10	it is the intent of the United States of America, pursuant to 21 U.S.C. §853(p), to seek
11	forfeiture of any properties of the defendant for the in personam criminal forfeiture money
12	judgment including, but not limited to, at least \$1,862,941.70.
13	All pursuant to 18 U.S.C. § 981(a)(1)(C) with 28 U.S.C. § 2461(c); 18 U.S.C. §§
14	1341, 1347, and 1957; and 21 U.S.C. § 853(p).
15	FORFEITURE ALLEGATION TWO Mail Fraud and Health Care Fraud
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17	1. The allegations contained in Counts 1-6 of this Criminal Indictment are
18	hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture
19	pursuant to 18 U.S.C. § 982(a)(7).
20	2. Upon conviction of any of the felony offenses charged in 1-6 of this Criminal
21	Indictment,
22	ARMEN MAGZANYAN,
23	aka "Arman Magzanyan" aka "Arman Magz,"
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1	defendant herein, shall forfeit to the United States of America, property, real or
2	personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable
3	to the commission of 18 U.S.C. §§ 1341 and 1347, involving a Federal health care offense
4	as defined in 18 U.S.C. § 24, an in personam criminal forfeiture money judgment
5	including, but not limited to, at least \$1,862,941.70; and that the net sale proceeds of the
6	following property will be applied towards the payment of the money judgment:
7	a. 7808 GENZER DRIVE, LAS VEGAS, NEVADA 89145, LOT THREE (3) IN BLOCK TEN (10) OF CHARLESTON RAINBOW UNIT NO.
8	17-A, AS SHOWN BY MAP THEREOF ON FILE IN BOOK 24 OF PLATS, PAGE 34, IN THE OFFICE OF THE COUNTY RECORDER
9	OF CLARK COUNTY, NEVADA, AND AMENDED BY CERTIFICATE OF AMENDMENT, RECORDED JUNE 14, 1979 IN
10	BOOK 1070 AS DOCUMENT NO. 1029899, OFFICIAL RECORDS, CLARK COUNTY, NEVADA; TOGETHER WITH ALL
11	IMPROVEMENTS AND APPURTENANCES THEREON, APN:
12	138-33-513-002;
13	b. 7208 GRAY STREET LAS VEGAS, NEVADA 89145, LOT SEVENTEEN (17) IN BLOCK FOUR (4) OF CHARLESTON RAINBOW UNIT NO. 10-A, AS SHOWN BY MAP THEREOF ON
14	FILE IN BOOK 14 OF PLATS, PAGE 22, IN THE OFFICE OF THE COUNTY RECORDER OF CLARK COUNTY, NEVADA;
15	TOGETHER WITH ALL IMPROVEMENTS AND APPURTENANCES THEREON, APN: 138-34-311-044;
16	APPURIENANCES INEREON, APN. 156-54-511-044,
17	c. 9081 LAWTON PINE AVENUE, LAS VEGAS, NEVADA 89129, LOT TWENTY-EIGHT (28) IN BLOCK SEVENTEEN (17) OF
18	GOWAN/FORT APACHE-PHASE 5-UNIT B, AS SHOWN BY MAP THEREOF ON FILE IN BOOK 70 OF PLATS, PAGE 3, IN THE
19	OFFICE OF THE COUNTY RECORDER OF CLARK COUNTY, NEVADA; TOGETHER WITH ALL IMPROVEMENTS AND
20	APPURTENANCES THEREON, APN: 138-08-222-023; and
21	d. 2211 SOUTH TIOGA WAY, LAS VEGAS, NEVADA 89117,
22	PARCEL I: THAT PORTION OF THE SOUTHWEST QUARTER (SW 1/4) OF THE SOUTHWEST QUARTER (SW 1/4) OF SECTION
23	3, TOWNSHIP 21 SOUTH, RANGE 60 EAST, M.D.M., DESCRIBED AS FOLLOWS:
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11	Case 2:20-cr-00254-JAD-EJY Document 1 Filed 09/16/20 Page 12 of 15
1	LOT TWO (2) OF THAT CERTAIN PARCEL MAP IN FILE 21 OF
2	PARCEL MAPS, PAGE 31, IN THE OFFICE OF THE COUNTY RECORDER OF CLARK COUNTY, NEVADA, AND RECORDED
3	AUGUST 28, 1978 IN BOOK 935 AS DOCUMENT NO. 894854, OFFICIAL RECORDS.
4	PARCEL II: A NON-EXCLUSIVE EASEMENT FOR INGRESS AND
5	EGRESS OVER THOSE PORTIONS OF LOTS ONE (1), THREE (3) AND FOUR (4) LYING WITHIN THE PRIVATE DRIVE AS
6	SHOWN BY SAID MAP; TOGETHER WITH ALL IMPROVEMENTS AND APPURTENANCES THEREON, APN: 163-03-401-002;
7	(all of which constitutes property).
8	3. If any property subject to forfeiture pursuant to 18 U.S.C. § 982(a)(7), as a
9	result of any act or omission of the defendant(s)-
10	a. cannot be located upon the exercise of due diligence;
11	b. has been transferred or sold to, or deposited with, a third party;
12	c. has been placed beyond the jurisdiction of the court;
13	d. has been substantially diminished in value; or
14	e. has been commingled with other property which cannot be divided without
15	difficulty;
16	it is the intent of the United States of America, pursuant to 21 U.S.C. § 853(p), to seek
17	forfeiture of any properties of the defendant for the in personam criminal forfeiture money
18 19	judgment including, but not limited to, at least \$1,862,941.70.
20	All pursuant to 18 U.S.C. § 982(a)(7); 18 U.S.C. §§ 1341 and 1347; and 21 U.S.C. §
20	853(p).
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1	FORFEITURE ALLEGATION THREE Money Laundering
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3	1. The allegations contained in Counts 7-15 of this Criminal Indictment are
4	hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture
5	pursuant to 18 U.S.C. § 981(a)(1)(A) with 28 U.S.C. § 2461(c) and 18 U.S.C. § 982(a)(1).
6	2. Upon conviction of any of the felony offenses charged in Counts 7-15 of this
7	Criminal Indictment,
8	ARMEN MAGZANYAN, aka "Arman Magzanyan"
9	aka "Arman Magzanyan" aka "Arman Magz,"
10	defendant herein, shall forfeit to the United States of America, any property, real or
11	
12	personal, involved in transactions or attempted transactions in violations of 18 U.S.C. §
13	1957, or any property traceable to such property:
14	defendant herein, shall forfeit to the United States of America, any property, real or
15	personal, involved in violations of 18 U.S.C. § 1957, or any property traceable to such
16	property:
17	an in personam criminal forfeiture money judgment including, but not limited to, at
18	least \$1,260,539.85; and that the net sale proceeds of the following property will be applied
19	towards the payment of the money judgment:
20	
21	a. 7808 GENZER DRIVE, LAS VEGAS, NEVADA 89145, LOT THREE (3) IN BLOCK TEN (10) OF CHARLESTON RAINBOW UNIT NO.
22	17-A, AS SHOWN BY MAP THEREOF ON FILE IN BOOK 24 OF PLATS, PAGE 34, IN THE OFFICE OF THE COUNTY
23	RECORDER OF CLARK COUNTY, NEVADA, AND AMENDED BY CERTIFICATE OF AMENDMENT, RECORDED JUNE 14,
24	1979 IN BOOK 1070 AS DOCUMENT NO. 1029899, OFFICIAL RECORDS, CLARK COUNTY, NEVADA; TOGETHER WITH

п	Case 2:20-cr-00254-JAD-EJY Document 1 Filed 09/16/20 Page 14 of 15
1	ALL IMPROVEMENTS AND APPURTENANCES THEREON, APN: 138-33-513-002;
2	b. 7208 GRAY STREET LAS VEGAS, NEVADA 89145, LOT
3	SEVENTEEN (17) IN BLOCK FOUR (4) OF CHARLESTON
4	RAINBOW UNIT NO. 10-A, AS SHOWN BY MAP THEREOF ON FILE IN BOOK 14 OF PLATS, PAGE 22, IN THE OFFICE OF THE
5	COUNTY RECORDER OF CLARK COUNTY, NEVADA; TOGETHER WITH ALL IMPROVEMENTS AND
6	APPURTENANCES THEREON , APN: 138-34-311-044;
7	c. 9081 LAWTON PINE AVENUE, LAS VEGAS, NEVADA 89129,
8	LOT TWENTY-EIGHT (28) IN BLOCK SEVENTEEN (17) OF GOWAN/FORT APACHE-PHASE 5-UNIT B, AS SHOWN BY
	MAP THEREOF ON FILE IN BOOK 70 OF PLATS, PAGE 3, IN THE OFFICE OF THE COUNTY RECORDER OF CLARK
9	COUNTY, NEVADA; TOGETHER WITH ALL IMPROVEMENTS
10	AND APPURTENANCES THEREON, APN: 138-08-222-023; and
11	d. 2211 SOUTH TIOGA WAY, LAS VEGAS, NEVADA 89117,
12	PARCEL I: THAT PORTION OF THE SOUTHWEST QUARTER (SW 1/4) OF THE SOUTHWEST QUARTER (SW 1/4) OF
13	SECTION 3, TOWNSHIP 21 SOUTH, RANGE 60 EAST, M.D.M.,
14	DESCRIBED AS FOLLOWS:
15	LOT TWO (2) OF THAT CERTAIN PARCEL MAP IN FILE 21 OF PARCEL MAPS, PAGE 31, IN THE OFFICE OF THE COUNTY
16	RECORDER OF CLARK COUNTY, NEVADA, AND RECORDED AUGUST 28, 1978 IN BOOK 935 AS DOCUMENT NO. 894854,
	OFFICIAL RECORDS.
17	PARCEL II: A NON-EXCLUSIVE EASEMENT FOR INGRESS
18	AND EGRESS OVER THOSE PORTIONS OF LOTS ONE (1), THREE (3) AND FOUR (4) LYING WITHIN THE PRIVATE
19	DRIVE AS SHOWN BY SAID MAP; TOGETHER WITH ALL IMPROVEMENTS AND APPURTENANCES THEREON, APN:
20	163-03-401-002;
21	(all of which constitutes property).
22	3. If any property subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) with
23	28 U.S.C. § 2461(c) and 18 U.S.C. § 982(a)(1), as a result of any act or omission of the
24	defendant:

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1	a. cannot be located upon the exercise of due diligence;
2	b. has been transferred or sold to, or deposited with, a third party;
3	c. has been placed beyond the jurisdiction of the court;
4	d. has been substantially diminished in value; or
5	e. has been commingled with other property which cannot be divided without
6	difficulty;
7	it is the intent of the United States of America, pursuant to 21 U.S.C. § 853(p), to seek
8	forfeiture of any properties of the defendant for the in personam criminal forfeiture money
9	judgment including, but not limited to, at least \$1,260,539.85.
10	All pursuant to 18 U.S.C. § 981(a)(1)(A) with 28 U.S.C. § 2461(c) and 18 U.S.C. §
11	982(a)(1); 18 U.S.C. §1957; and 21 U.S.C. § 853(p).
12	DATED: this 16 th day of September, 2020.
13	A TRUE BILL:
14	
15	- /S/ FOREPERSON OF THE GRAND JURY
16	FOREFERSON OF THE GRAND JURI
17	NICHOLAS A. TRUTANICH United States Attorney
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19	Errin allini
20	JESSICA OLIVA Assistant United States Attorney
21	Assistant Onicu States Attoiney
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