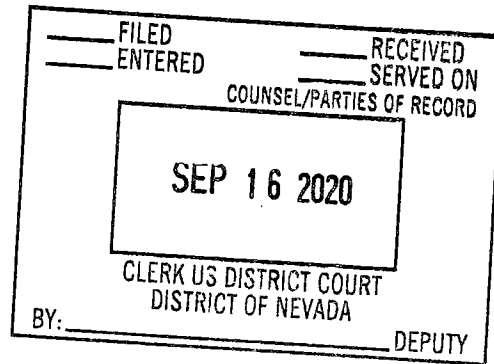


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2 District of Nevada
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6 *Attorneys for Plaintiff*
7 *The United States of America*

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 vs.

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

15 Defendant.

CRIMINAL INDICTMENT

Case No.: 2:20-cr- 254

VIOLATIONS:

- 18 U.S.C. §§ 1341, 2 – Mail Fraud;
- 18 U.S.C. §§ 1347, 2 – Health Care Fraud;
- and
- 18 U.S.C. §§ 1957, 2 – Monetary Transactions in Criminally Derived Property.

19
20 **THE GRAND JURY CHARGES THAT:**

21 **INTRODUCTORY ALLEGATIONS**

22 1. From in or around November 2014 through in or around December 2015,
23 ARMEN MAGZANYAN, also known as "Arman Magzanyan" and "Arman Magz"

24

1 hereinafter "MAGZANYAN"), defendant herein, with others known and unknown to the
2 Grand Jury, operated the company GR8SLEEP.CM d/b/a Las Vegas Sleep Lab
3 (hereinafter "LVSL") in Nevada.

4 2. LVSL claimed to conduct (among other services) monitored sleep studies. A
5 properly conducted monitored sleep study is a medical diagnostic procedure in which a
6 patient's breathing, heartrate, and other vital signs are monitored while the patient sleeps.
7 The purpose of a monitored sleep study is to determine whether the patient suffers from
8 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.

11 4. At all times relevant to this indictment, Health Insurance Company 1 had an
12 agreement with a student scholarship program of the Ministry of Education of a foreign
13 nation, under which students from that nation studying throughout the United States were
14 insured through a health care benefits plan provided by Health Insurance Company 1. This
15 plan, hereinafter the "Student Plan," was a healthcare benefits program which affected
16 interstate commerce and which provided medical benefits, items, and services to those
17 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.

24

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

COUNT	ON OR ABOUT	DESCRIPTION OF MAILED ITEM
ONE	09/24/2015	Check for \$105,861 made payable to LVSL
TWO	11/12/2015	Check for \$247,009 made payable to LVSL
THREE	12/03/2015	Check for \$383,116 made payable to LVSL

4
5
6
7
8
9 **COUNTS FOUR TO SIX**

Health Care Fraud
 (18 U.S.C. §§ 1347, 2)

10
11 20. The allegations in paragraphs 1 through 19 are realleged and incorporated as
 12 though fully set forth in this count.

13 21. From a date unknown but no later than on or about August 17, 2015 through
 14 a date unknown but no earlier than on or about December 12, 2015, in the State and
 15 Federal District of Nevada and elsewhere,

16 **ARMEN MAGZANYAN**
 aka "Arman Magzanyan"
 17 aka "Arman Magz,"

18 defendant herein, and others known and unknown to the grand jury, knowingly
 19 participated in and devised and intended to devise a scheme and artifice to defraud and for
 20 obtaining money and property owned by and under the custody and control of a health
 21 care benefit program by means of materially false and fraudulent pretenses and
 22 representations in connection with the delivery of and payment for health-care benefits,
 23 items, and services.
 24

FIFTEEN	05/02/2016	Bank 1 5069	Check Number 1087	\$120,050.25	Car Dealer 1
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FORFEITURE ALLEGATION ONE
Mail Fraud, Health Care Fraud, and Money Laundering

1. The allegations contained in Counts 1-15 of this Criminal Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) with 28 U.S.C. § 2461(c).

2. Upon conviction of any of the felony offenses charged in Counts 1-15 of this Criminal Indictment,

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

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. §§ 1341 and 1347, specified unlawful activities as defined in 18 U.S.C. §§ 1956(c)(7)(F), involving a Federal health care offense as defined in 18 U.S.C. § 24, or conspiracy to commit such offenses:

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. §§ 1341 and 1957, specified unlawful activities as defined in 18 U.S.C. §§ 1956(c)(7)(A) and 1961(1)(B), or a conspiracy to commit such offenses:

an in personam criminal forfeiture money judgment including, but not limited to, at least \$1,862,941.70; and that the net sale proceeds of the following property will be applied towards the payment of the money judgment:

1 a. 7808 GENZER DRIVE, LAS VEGAS, NEVADA 89145, LOT THREE
2 (3) IN BLOCK TEN (10) OF CHARLESTON RAINBOW UNIT NO.
3 17-A, AS SHOWN BY MAP THEREOF ON FILE IN BOOK 24 OF
4 PLATS, PAGE 34, IN THE OFFICE OF THE COUNTY RECORDER
5 OF CLARK COUNTY, NEVADA, AND AMENDED BY
6 CERTIFICATE OF AMENDMENT, RECORDED JUNE 14, 1979 IN
7 BOOK 1070 AS DOCUMENT NO. 1029899, OFFICIAL RECORDS,
8 CLARK COUNTY, NEVADA; TOGETHER WITH ALL
9 IMPROVEMENTS AND APPURTENANCES THEREON, APN:
10 138-33-513-002;

11 b. 7208 GRAY STREET LAS VEGAS, NEVADA 89145, LOT
12 SEVENTEEN (17) IN BLOCK FOUR (4) OF CHARLESTON
13 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
15 COUNTY RECORDER OF CLARK COUNTY, NEVADA;
16 TOGETHER WITH ALL IMPROVEMENTS AND
17 APPURTENANCES THEREON , APN: 138-34-311-044;

18 c. 9081 LAWTON PINE AVENUE, LAS VEGAS, NEVADA 89129,
19 LOT TWENTY-EIGHT (28) IN BLOCK SEVENTEEN (17) OF
20 GOWAN/FORT APACHE-PHASE 5-UNIT B, AS SHOWN BY MAP
21 THEREOF ON FILE IN BOOK 70 OF PLATS, PAGE 3, IN THE
22 OFFICE OF THE COUNTY RECORDER OF CLARK COUNTY,
23 NEVADA; TOGETHER WITH ALL IMPROVEMENTS AND
24 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.

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

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**
16 **Mail Fraud and Health Care Fraud**

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"**
24 **aka "Arman Magz,"**

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
8 (3) IN BLOCK TEN (10) OF CHARLESTON RAINBOW UNIT NO.
9 17-A, AS SHOWN BY MAP THEREOF ON FILE IN BOOK 24 OF
10 PLATS, PAGE 34, IN THE OFFICE OF THE COUNTY RECORDER
11 OF CLARK COUNTY, NEVADA, AND AMENDED BY
12 CERTIFICATE OF AMENDMENT, RECORDED JUNE 14, 1979 IN
13 BOOK 1070 AS DOCUMENT NO. 1029899, OFFICIAL RECORDS,
14 CLARK COUNTY, NEVADA; TOGETHER WITH ALL
15 IMPROVEMENTS AND APPURTENANCES THEREON, APN:
16 138-33-513-002;
- 17 b. 7208 GRAY STREET LAS VEGAS, NEVADA 89145, LOT
18 SEVENTEEN (17) IN BLOCK FOUR (4) OF CHARLESTON
19 RAINBOW UNIT NO. 10-A, AS SHOWN BY MAP THEREOF ON
20 FILE IN BOOK 14 OF PLATS, PAGE 22, IN THE OFFICE OF THE
21 COUNTY RECORDER OF CLARK COUNTY, NEVADA;
22 TOGETHER WITH ALL IMPROVEMENTS AND
23 APPURTENANCES THEREON , APN: 138-34-311-044;
- 24 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:

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

6 PARCEL II: A NON-EXCLUSIVE EASEMENT FOR INGRESS AND
7 EGRESS OVER THOSE PORTIONS OF LOTS ONE (1), THREE (3)
8 AND FOUR (4) LYING WITHIN THE PRIVATE DRIVE AS
9 SHOWN BY SAID MAP; TOGETHER WITH ALL
10 IMPROVEMENTS AND APPURTENANCES THEREON, APN:
11 163-03-401-002;

12 (all of which constitutes property).

13 3. If any property subject to forfeiture pursuant to 18 U.S.C. § 982(a)(7), as a
14 result of any act or omission of the defendant(s)-

- 15 a. cannot be located upon the exercise of due diligence;
- 16 b. has been transferred or sold to, or deposited with, a third party;
- 17 c. has been placed beyond the jurisdiction of the court;
- 18 d. has been substantially diminished in value; or
- 19 e. has been commingled with other property which cannot be divided without
20 difficulty;

21 it is the intent of the United States of America, pursuant to 21 U.S.C. § 853(p), to seek
22 forfeiture of any properties of the defendant for the in personam criminal forfeiture money
23 judgment including, but not limited to, at least \$1,862,941.70.

24 All pursuant to 18 U.S.C. § 982(a)(7); 18 U.S.C. §§ 1341 and 1347; and 21 U.S.C. §
853(p).

FORFEITURE ALLEGATION THREE
Money Laundering

1
2
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,**
9 **aka "Arman Magzanyan"**
10 **aka "Arman Magz,"**

11 defendant herein, shall forfeit to the United States of America, any property, real or
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
22 (3) IN BLOCK TEN (10) OF CHARLESTON RAINBOW UNIT NO.
23 17-A, AS SHOWN BY MAP THEREOF ON FILE IN BOOK 24 OF
24 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

1 ALL IMPROVEMENTS AND APPURTENANCES THEREON,
2 APN: 138-33-513-002;

3 b. 7208 GRAY STREET LAS VEGAS, NEVADA 89145, LOT
4 SEVENTEEN (17) IN BLOCK FOUR (4) OF CHARLESTON
5 RAINBOW UNIT NO. 10-A, AS SHOWN BY MAP THEREOF ON
6 FILE IN BOOK 14 OF PLATS, PAGE 22, IN THE OFFICE OF THE
7 COUNTY RECORDER OF CLARK COUNTY, NEVADA;
8 TOGETHER WITH ALL IMPROVEMENTS AND
9 APPURTENANCES THEREON , APN: 138-34-311-044;

10 c. 9081 LAWTON PINE AVENUE, LAS VEGAS, NEVADA 89129,
11 LOT TWENTY-EIGHT (28) IN BLOCK SEVENTEEN (17) OF
12 GOWAN/FORT APACHE-PHASE 5-UNIT B, AS SHOWN BY
13 MAP THEREOF ON FILE IN BOOK 70 OF PLATS, PAGE 3, IN
14 THE OFFICE OF THE COUNTY RECORDER OF CLARK
15 COUNTY, NEVADA; TOGETHER WITH ALL IMPROVEMENTS
16 AND APPURTENANCES THEREON , APN: 138-08-222-023; and

17 d. 2211 SOUTH TIOGA WAY, LAS VEGAS, NEVADA 89117,

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

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

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

(all of which constitutes property).

3. If any property subject to forfeiture 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), as a result of any act or omission of the
defendant:

- 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.

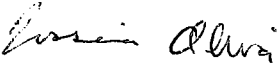
10 All pursuant to 18 U.S.C. § 981(a)(1)(A) with 28 U.S.C. § 2461(c) and 18 U.S.C. §
11 982(a)(1); 18 U.S.C. §1957; and 21 U.S.C. § 853(p).

12 **DATED:** this 16th day of September, 2020.

13 **A TRUE BILL:**

14
15 */S/*
16 FOREPERSON OF THE GRAND JURY

17 NICHOLAS A. TRUTANICH
18 United States Attorney

19 
20 JESSICA OLIVA
21 Assistant United States Attorney
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