

KDE:MRG/DR
F.#2021R00239

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

ROMAN NIKOGHOSYAN,
also known as "Roma,"

Defendant.

INDICTMENT

Cr. No. 1:21-cr-00421(RJD)(RLM)
(T. 18, U.S.C., §§ 371, 922(g)(1),
924(a)(2), 924(d)(1), 981(a)(1)(C),
982(a)(5), 1951(a), 2 and 3551 et seq.;
T. 21, U.S.C., § 853(p); T. 28, U.S.C.,
§ 2461(c))

----- X

THE GRAND JURY CHARGES:

COUNT ONE
(Hobbs Act Extortion Conspiracy)

1. In or about and between January 2021 and July 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ROMAN NIKOGHOSYAN, also known as "Roma," together with others, did knowingly and intentionally conspire to obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and others agreed to obtain property, to wit: United States currency, from John Doe #1, an individual whose identity is known to the Grand Jury, with his consent, which consent was to be induced through wrongful use of actual and threatened force, violence and fear.

(Title 18, United States Code, Sections 1951(a) and 3551 et seq.)

COUNT TWO
(Hobbs Act Extortion)

2. In or about and between January 2021 and July 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ROMAN NIKOGHOSYAN, also known as “Roma,” together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and others agreed to obtain property, to wit: United States currency, from John Doe #1, with his consent, which consent was induced through wrongful use of actual and threatened force, violence and fear.

(Title 18, United States Code, Sections 1951(a), 2 and 3551 et seq.)

COUNT THREE
(Hobbs Act Extortion Conspiracy)

3. In or about and between June 2021 and July 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ROMAN NIKOGHOSYAN, also known as “Roma,” together with others, did knowingly and intentionally conspire to obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and others agreed to obtain property, to wit: United States currency, from John Doe #2, an individual whose identity is known to the Grand Jury, with his consent, which consent was to be induced through wrongful use of actual and threatened force, violence and fear.

(Title 18, United States Code, Sections 1951(a) and 3551 et seq.)

COUNT FOUR
(Conspiracy to Transport Stolen Property)

4. In or about and between May 2021 and July 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ROMAN NIKOGHOSYAN, also known as “Roma,” together with others, did knowingly and willfully conspire to transport in interstate commerce and foreign commerce goods, wares and merchandise valued at \$5,000 or more, to wit: motor vehicles, knowing the same to have been stolen, converted and taken by fraud, contrary to Title 18, United States Code, Section 2314.

5. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendant NIKOGHOSYAN, together with others, did commit and cause the commission of, among others, the following:

OVERT ACTS

(a) On or about June 2, 2021, NIKOGHOSYAN spoke with a co-conspirator whose identity is known to the Grand Jury (“Co-Conspirator #1”) about traveling to Los Angeles, California to acquire a motor vehicle that NIKOGHOSYAN would then drive back to New York.

(b) On or about June 2, 2021, NIKOGHOSYAN again spoke with Co-Conspirator #1 about, among other things, acquiring motor vehicles that had disabled anti-theft security systems, and NIKOGHOSYAN stated that he intended to place “fake” license plates on such a vehicle.

(c) On or about June 8, 2021, NIKOGHOSYAN flew from New York to Los Angeles, California.

(d) On or about June 8, 2021, while NIKOGHOSYAN was in Los Angeles, California, a co-conspirator (“Co-Conspirator #2”), an individual whose identity is known to the Grand Jury, posted a picture of a white Alfa Romeo Giulia to Instagram with the caption: “New toy available in New York next week.”

(e) On or about June 11, 2021, NIKOGHOSYAN told another individual that NIKOGHOSYAN had recently acquired an Alfa Romeo motor vehicle.

(f) On or about June 11, 2021, NIKOGHOSYAN and Co-Conspirator #2 discussed the methods by which they intended to transport stolen vehicles, including an Alfa Romeo, from Los Angeles, California to New York.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNT FIVE
(Felon in Possession of a Firearm)

6. On or about July 20, 2021, within the Eastern District of New York, the defendant ROMAN NIKOGHOSYAN, also known as “Roma,” knowing that he had previously been convicted in a court of one or more crimes punishable by a term of imprisonment exceeding one year, did knowingly and intentionally possess in and affecting commerce a firearm, to wit: a Hi-Point 995 rifle bearing serial number F57454.

(Title 18, United States Code, Sections 922(g)(1), 924(a)(2) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS ONE THROUGH THREE

7. The United States hereby gives notice to the defendant that, upon his conviction of any of the offenses charged in Counts One through Three, the government will seek forfeiture in accordance with: (a) Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offenses to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offenses; and (b) Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, 2461(c), which require the forfeiture of any firearm or ammunition involved in or used in any violation of any criminal law of the United States, including but not limited to one Hi-Point 995 rifle bearing serial number F57454 and ammunition, seized on or about July 20, 2021, from a room rented by the defendant in Brooklyn, New York.

8. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

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

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT FOUR

9. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count Four, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(5), which requires any person convicted of such offense to forfeit any property, real or personal, which represents or is traceable to the gross proceeds obtained, directly or indirectly, as a result of such offense.

10. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

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

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 982(a)(5); Title 21, United States Code, Section 853(p))

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT FIVE


11. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count Five, the government will seek forfeiture in accordance with Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), which require the forfeiture of any firearm or ammunition involved in or used in any knowing violation of Title 18, United States Code, Section 922, including, but not limited to, one Hi-Point 995 rifle bearing serial number F57454 and ammunition, seized on or about July 20, 2021, in Brooklyn, New York.

12. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

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

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 924(d)(1); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))



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EASTERN DISTRICT OF NEW YORK



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FORM DBD-34
JUN. 85

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CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

ROMAN NIKOGHOSYAN,

Defendant.

INDICTMENT

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982(a)(5), 1951(a), 2 and 3551 *et seq.*; T. 21, U.S.C., § 853(p); T. 28,
U.S.C., § 2461(c))

[REDACTED]

Filed in open court this _____ day,

of _____ A.D. 20____

Clerk

Bail, \$ _____

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