

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
June 2023 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

PETROS FICHIDZHIAN,
aka "Peter Fichidzhian,"
JUAN CARLOS ESPARZA,
KARPIS SRAPYAN,
aka "Tony Levy,"
SUSANNA HARUTYUNYAN, and
MIHRAN PANOSYAN,
aka "Mike Hope,"

Defendants.

No. CR 2:24-cr-00348-SVW

I N D I C T M E N T

[18 U.S.C. § 1349: Conspiracy to Commit Health Care Fraud; 18 U.S.C. § 1347: Health Care Fraud; 18 U.S.C. § 1028A(a)(1): Aggravated Identity Theft; 18 U.S.C. § 1956(h): Conspiracy to Launder Money; 18 U.S.C. § 1956(a)(1)(B)(i): Money Laundering; 18 U.S.C. § 1957: Monetary Transactions in Criminally Derived Property over \$10,000; 18 U.S.C. § 1035(a)(2): False Statements Related to Health Care Matters; 18 U.S.C. §§ 982(a)(1) and (a)(7), and 28 U.S.C. § 2461(c): Criminal Forfeiture]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 1349]

[Defendants FICHIDZHIAN, ESPARZA, and SRAPYAN]

At times relevant to this Indictment:

A. INTRODUCTORY ALLEGATIONS

Individuals

1. Defendant PETROS FICHIDZHIAN, also known as ("aka") "Peter Fichidzhian," was a resident of Granada Hills, California.

2. Defendant JUAN CARLOS ESPARZA was a resident of Valley Village, California.

3. Defendant KARPIS SRAPYAN, aka "Tony Levy," was a resident of Winnetka, Northridge, Woodland Hills and/or Van Nuys, California.

4. B.L. was a citizen of Russia who was issued a United States visa in or around April 2010, and departed the United States on or about September 29, 2010.

5. D.G. was a citizen of Russia who was issued a United States visa in or around June 2013, and departed the United States on or about September 18, 2013.

6. A.M. was a citizen of Russia who was issued a United States visa in or around February 2018, and departed the United States on or about May 30, 2019.

7. I.S. was a citizen of Ukraine who was issued a United States visa in or around June 2010, and departed the United States on or about September 10, 2010.

8. Physician 1 was a medical doctor licensed to practice in California.

9. Physician 2 was a medical doctor licensed to practice

1 in California who died on or about March 29, 2019.

2 10. Physician 3 was a medical doctor licensed to practice
3 in California who died on or about January 21, 2022.

4 Entities

5 11. MJ Home Health Services, Inc. ("MJ Home Health") was a
6 home health care agency located at 6450 Bellingham Avenue, Suite
7 B, North Hollywood, California. Defendant FICHIDZHYAN owned,
8 controlled, and operated MJ Home Health. Defendant ESPARZA
9 claimed that defendant ESPARZA was employed by MJ Home Health.

10 12. Healthy Life Hospice, Inc. ("Healthy Life") was a
11 purported hospice company that used addresses at 12509 Oxnard
12 Street, Suite 215, North Hollywood, California, and 6422
13 Bellingham Avenue, No. 201, Los Angeles, California. Beginning
14 in or around April 2019, B.L. was purportedly the sole owner of
15 Healthy Life, according to records submitted to the State of
16 California and Medicare.

17 13. Prayer of Hope Hospice ("Prayer of Hope") was a
18 purported hospice company that used an address at 11336
19 Camarillo Street, Unit 305, West Toluca Lake, California.
20 Beginning in or around February 2020, D.G. was purportedly the
21 Chief Executive Officer ("CEO"), Chief Financial Officer
22 ("CFO"), and Secretary of Prayer of Hope, and beginning in or
23 around March 2020, A.M. was purportedly the sole owner, and
24 beginning in or around April 2020, A.M. purportedly became the
25 CEO, CFO, and Secretary of Prayer of Hope, according to records
26 submitted to the State of California and Medicare.

27 14. Dynamic Hospice Care, Inc. ("Dynamic") was a purported
28 hospice company that used addresses at 10319 Norris Avenue,

1 Suite C, Pacoima, California, and 5958 Vineland Avenue, Unit D,
2 North Hollywood, California. Beginning in or around July 2020,
3 I.S. was purportedly the CEO, CFO, and Secretary of Dynamic,
4 according to records submitted to the State of California.
5 Beginning no later than March 2021, I.S. was purportedly the
6 sole owner of Dynamic, according to records submitted to
7 Medicare.

8 15. House of Angels Hospice, Inc. ("House of Angels") was
9 a purported hospice company that used an address at 5627
10 Sepulveda Boulevard, Suite 218, Van Nuys, California. Beginning
11 in or around April 2021, defendant ESPARZA owned, controlled,
12 and operated House of Angels.

13 Residences

14 16. The Winnetka Residence was a single-family residence
15 located in Winnetka, California.

16 17. The Northridge Residence was a single-family residence
17 located in Northridge, California.

18 The Medicare Program

19 18. Medicare was a federal health care benefit program,
20 affecting commerce, that provided benefits to individuals who
21 were 65 years and older or disabled. Medicare was administered
22 by the Centers for Medicare and Medicaid Services ("CMS"), a
23 federal agency under the United States Department of Health and
24 Human Services. Medicare was a "health care benefit program" as
25 defined by Title 18, United States Code, Section 24(b).

26 19. Individuals who qualified for Medicare benefits were
27 referred to as Medicare "beneficiaries." Each beneficiary was
28 given a unique health insurance claim number.

1 20. Hospices, home health agencies, physicians, and other
2 health care providers who provided services to beneficiaries
3 that were reimbursed by Medicare were referred to as Medicare
4 "providers."

5 21. To participate in Medicare, Medicare required
6 prospective providers to be licensed by a state or local agency.
7 After obtaining the applicable license, Medicare required
8 prospective hospice and home health providers to submit an
9 application in which the prospective provider agreed to, among
10 other things, not submit claims for payment to Medicare knowing
11 they were false or fraudulent or with deliberate ignorance or
12 reckless disregard of their truth or falsity. If Medicare
13 approved a provider's application, Medicare assigned the
14 provider a Medicare "provider number," which was used for the
15 processing and payment of claims submitted by the provider.

16 22. A health care provider with a Medicare provider number
17 could submit claims to Medicare to obtain reimbursement for
18 services rendered to Medicare beneficiaries.

19 Hospice Services

20 23. Medicare coverage for hospice services was limited to
21 situations in which: (1) a physician certified that the
22 beneficiary was terminally ill; and (2) the beneficiary signed
23 an election form statement choosing hospice care instead of
24 other Medicare benefits. Medicare considered a beneficiary to
25 be "terminally ill" if the beneficiary's life expectancy was six
26 months or less, if the beneficiary's illness ran its normal
27 course.

28 24. Hospice services reimbursed by Medicare were

1 palliative in nature (also referred to as "comfort care") and
2 included, but were not limited to, medications to manage pain
3 symptoms, necessary medical equipment, and bereavement services
4 to surviving family members.

5 25. Once a beneficiary chose hospice care, Medicare would
6 not cover treatment intended to cure the beneficiary's terminal
7 illness. The beneficiary had to sign and date an election form
8 documenting this choice. The election form had to include an
9 acknowledgement that the beneficiary had been given a full
10 understanding of hospice care, particularly the palliative
11 rather than curative nature of treatment, and an acknowledgement
12 that the beneficiary understood that certain Medicare services
13 were waived by the election. The election form also identified
14 the attending physician for the beneficiary, which is the
15 qualified medical provider deemed to have the most significant
16 role in the determination and delivery of the beneficiary's
17 medical care in hospice.

18 26. To obtain payment from Medicare for hospice services,
19 the hospice provider must submit a claim for payment.
20 Generally, such claims must set forth, among other things: the
21 beneficiary's name and unique Medicare identification number;
22 the type of services provided to the beneficiary; the date(s)
23 that the services were provided; and the name and National
24 Provider Identifier ("NPI") or Unique Physician Identification
25 Number of the attending physician.

26 B. OBJECT OF THE CONSPIRACY

27 27. Beginning no later than in or around February 2019,
28 and continuing through at least in or around January 2023, in

1 Los Angeles County, within the Central District of California,
2 and elsewhere, defendants FICHIDZHYAN, ESPARZA, and SRAPYAN
3 knowingly conspired with each other and others known and unknown
4 to the Grand Jury to commit health care fraud, in violation of
5 Title 18, United States Code, Section 1347.

6 C. MANNER AND MEANS OF THE CONSPIRACY

7 28. The object of the conspiracy was carried out, and was
8 to be carried out, in substance as follows:

9 The Conspirators Established Control of Health Care
10 Entities, Including Through Impersonated Identities

11 a. Defendants FICHIDZHYAN, ESPARZA, and SRAPYAN,
12 along with others known and unknown to the Grand Jury, would
13 obtain the names, dates of birth, social security numbers, and
14 other personal identifying information of foreign persons who at
15 one time had been present in the United States on U.S. visas,
16 but had departed the United States (the "Impersonated
17 Identities"), including, among others, B.L., D.G., A.M., and
18 I.S.

19 b. Defendants FICHIDZHYAN, ESPARZA, and SRAPYAN,
20 along with others known and unknown to the Grand Jury, would
21 attempt to obtain and would obtain means of identification for
22 the Impersonated Identities.

23 c. Defendants FICHIDZHYAN, ESPARZA, and SRAPYAN,
24 along with others known and unknown to the Grand Jury, would
25 establish control over hospice entities, including House of
26 Angels, Healthy Life, Prayer of Hope, and Dynamic (collectively,
27 the "Sham Hospices").

28 d. Defendants FICHIDZHYAN, ESPARZA, and SRAPYAN,

1 along with others known and unknown to the Grand Jury, would
2 represent that the Impersonated Identities were the owners and
3 officers of Healthy Life, Prayer of Hope, and Dynamic, including
4 by submitting the Impersonated Identities names and identifying
5 information to the California Secretary of State and Medicare.

6 e. Defendants FICHIDZHYAN, ESPARZA, and SRAPYAN,
7 along with others known and unknown to the Grand Jury, would
8 establish bank accounts in the names of the Impersonated
9 Identities and Sham Hospices, claiming the Impersonated
10 Identities as signatories.

11 f. Defendants FICHIDZHYAN, ESPARZA, and SRAPYAN,
12 along with others known and unknown to the Grand Jury, would use
13 the Impersonated Identities to sign property leases, including
14 defendant SRAPYAN falsely presenting himself as B.L. to sign
15 office leases on behalf of Dynamic and Healthy Life.

16 g. Defendants FICHIDZHYAN, ESPARZA, SRAPYAN, along
17 with others known and unknown to the Grand Jury, would obtain,
18 retain, and use cell phones, cell phone numbers, and cell phone
19 services in the names of the Impersonated Identities. This
20 includes a phone number ending in 4617 which defendants
21 FICHIDZHYAN, ESPARZA, SRAPYAN, along with others known and
22 unknown to the Grand Jury, would falsely list as I.S.'s cell
23 phone number on the customer profile for a Dynamic bank account,
24 and which defendant FICHIDZHYAN would use to call CMS while
25 posing as I.S. to make inquiries regarding Dynamic, and
26 regarding which defendant FICHIDZHYAN sent text messages to
27 defendant ESPARZA requesting that defendant ESPARZA pay the
28 phone bill for I.S.'s cell phone.

1 h. Defendant FICHIDZHYAN, along with others known
2 and unknown to the Grand Jury, would fund the Sham Hospices,
3 including in or around February 2020 defendant FICHIDZHYAN
4 provided initial funds via money orders from MJ Home Health to
5 fund Prayer of Hope's office rent, and in or around 2021
6 defendant FICHIDZHYAN provided funds via checks from MJ Home
7 Health to House of Angels.

8 i. Defendants FICHIDZHYAN, ESPARZA, SRAPYAN, along
9 with others known and unknown to the Grand Jury, would maintain
10 and access documents and information associated with the
11 Impersonated Identities and Sham Hospices at common business and
12 residential addresses, including keeping documents associated
13 with Prayer of Hope, Dynamic, D.G., and A.M. at House of Angels'
14 address, and keeping a House of Angels checkbook at MJ Home
15 Health's address.

16 j. Defendants FICHIDZHYAN, ESPARZA, SRAPYAN, along
17 with others known and unknown to the Grand Jury, would also
18 maintain at the Winnetka and Northridge Residences documents,
19 cell phones, and objects associated with Prayer of Hope,
20 Dynamic, Healthy Life, and the Impersonated Identities,
21 including driver's licenses, social security cards, cell phones,
22 password lists, forged initials, and checkbooks.

23 k. Defendants FICHIDZHYAN, ESPARZA, SRAPYAN, along
24 with others known and unknown to the Grand Jury, would also
25 access from the Northridge Residence email and bank accounts
26 associated with D.G., B.L., A.M., Prayer of Hope, and other bank
27 accounts that received funds derived from the scheme.
28

The Conspirators Submitted False Claims to Medicare,
Including Through Fraudulent Use of Physician and Patient
Information

1. Between no later than in or around July 2019 and continuing to at least in or around January 2023, defendants FICHIDZHYAN, ESPARZA, and SRAPYAN, along with others known and unknown to the Grand Jury, would submit and cause to be submitted false and fraudulent claims to Medicare on behalf of the Sham Hospices, seeking payment for purported hospice services on behalf of, and using the names and personal identifying information of, Medicare beneficiaries who in fact were ineligible for hospice services covered by Medicare, not terminally ill, and had never elected or received hospice care from the Sham Hospices, including in some instances claiming that the same beneficiary received services from multiple Sham Hospices.

m. Defendants FICHIDZHYAN, ESPARZA, and SRAPYAN, along with others known and unknown to the Grand Jury, would misappropriate the names and personal identifying information of doctors, including doctors listed in MJ Home Health documentation related to Medicare, Physician 1, and deceased Physicians 2 and 3, for use in the Sham Hospices' documentation related to Medicare, including in the submission of false and fraudulent claims for payment for purported hospices services, knowing and intending that Medicare would rely on that information as purportedly reflecting a physician's determination that hospice services billed were necessary and appropriate for the beneficiaries in determining whether to

1 reimburse the provider for the claim.

2 29. As a result of defendants FICHIDZHYAN, ESPARZA, and
3 SRAPYAN and their co-conspirators' false and fraudulent claims
4 for hospice services that were neither needed nor rendered,
5 Medicare paid the Sham Hospices more than approximately \$15
6 million, including at least \$4.4 million in payments to Healthy
7 Life (between July 2019 and April 2023), \$3.7 million in
8 payments to Prayer of Hope (between June 2020 and July 2023),
9 \$6.3 million in payments to Dynamic (between November 2020 and
10 July 2023), and \$1.3 million in payments to House of Angels
11 (between July 2021 and January 2023).

COUNTS TWO THROUGH FIVE

[18 U.S.C. §§ 1347, 2]

[Defendants FICHIDZHYAN and ESPARZA]

30. The Grand Jury re-alleges paragraphs 1 through 26 and 28 through 29 of this Indictment here.

A. THE SCHEME TO DEFRAUD

31. Beginning no later than in or around February 2019, and continuing to at least in or around January 2023, in Los Angeles County, within the Central District of California, and elsewhere, defendants FICHIDZHYAN and ESPARZA, together with others known and unknown to the Grand Jury, each aiding and abetting one another, knowingly, willfully, and with intent to defraud, executed and willfully caused to be executed a scheme and artifice: (a) to defraud Medicare, a health care benefit program, as to material matters in connection with the delivery of and payment for health care benefits, items, and services; and (b) to obtain money from Medicare, a health care benefit program, by means of materially false and fraudulent pretenses, representations, and promises and the concealment of material facts, in connection with the delivery of and payment for health care benefits, items, and services.

B. MANNER AND MEANS OF THE SCHEME TO DEFRAUD

32. The fraudulent scheme operated, in substance, as described in paragraph 28 of this Indictment.

C. EXECUTIONS OF THE SCHEME TO DEFRAUD

33. On or about the dates set forth below, in Los Angeles County, within the Central District of California, and elsewhere, defendants FICHIDZHYAN and ESPARZA, together with

others known and unknown to the Grand Jury, each aiding and abetting one another, knowingly and willfully executed and willfully caused to be executed the fraudulent scheme described above by submitting and causing to be submitted to Medicare the following false and fraudulent claims for payment for purported hospice services:

COUNT	ENTITY/CLAIM NO.	DATE CLAIM SUBMITTED	APPROX. AMOUNT BILLED	BENEFICIARY
TWO	Healthy Life/ 21935300030804CAR	12/19/2019	\$2,000	M.G.
THREE	Prayer of Hope/ 22103600675804CAR	7/16/2021	\$6,200	V.T.
FOUR	Dynamic/ 22124500649904CAR	9/2/2021	\$3,750	L.C.
FIVE	House of Angels/ 22223900048504CAR	8/27/2022	\$3,800	B.N.

COUNTS SIX THROUGH TEN

[18 U.S.C. §§ 1028A(a)(1), 2]

[Defendants FICHIDZHYAN, ESPARZA, and SRAPYAN]

34. The Grand Jury re-alleges paragraphs 1 through 26, 28, 29, and 33 of this Indictment here.

35. On or about the dates set forth below, in Los Angeles County, within the Central District of California, and elsewhere, the below defendants, together with others known and unknown to the Grand Jury, each aiding and abetting one another, knowingly transferred, possessed, and used, and willfully caused to be transferred, possessed, and used, without lawful authority, a means of identification of another person that the defendant(s) knew belonged to another person, as identified below, during and in relation to a felony violation, specified below:

COUNT	DEFENDANT(S)	DATE	MEANS OF IDENTIFICATION/FELONY VIOLATION
SIX	FICHIDZHYAN ESPARZA	12/19/2019	Used Physician 1's name and NPI during and in relation to a felony violation of Title 18, United States Code, Section 1347, as charged in Count Two of the Indictment
SEVEN	FICHIDZHYAN ESPARZA	4/14/2020	FICHIDZHYAN transferred to ESPARZA's possession the name and social security number for A.M. during and in relation to a felony violation of Title 18, United States Code, Section 1349, as charged in Count One of the Indictment

COUNT	DEFENDANT (S)	DATE	MEANS OF IDENTIFICATION/FELONY VIOLATION
EIGHT	SRAPYAN	6/1/2020	Used B.L.'s name and date of birth listed on a fake driver's license in signing a property lease for Dynamic during and in relation to a felony violation of Title 18, United States Code, Section 1349, as charged in Count One of the Indictment
NINE	SRAPYAN	6/18/2020	Possessed on iPhone with IMEI# 359408086013168 a photograph of a fake California's driver's license containing the name and date of birth of B.L. during and in relation to a felony violation of Title 18, United States Code, Section 1349, as charged in Count One of the Indictment
TEN	FICHIDZHIAN ESPARZA	8/2/2021	Used Physician 2's name and NPI in Medicare claim submission 22121400763504CAR from Dynamic for beneficiary M.D.M. during and in relation to a felony violation of Title 18, United States Code, Section 1349, as charged in Count One of the Indictment

COUNT ELEVEN

[18 U.S.C. § 1956(h)]

[All Defendants]

At times relevant to this Indictment:

A. INTRODUCTORY ALLEGATIONS

36. The Grand Jury re-alleges paragraphs 1 through 26, 28, 29, and 33 of this Indictment here.

37. Defendant SUSANNA HARUTYUNYAN was a resident of Winnetka, California. Defendant HARUTUNYAN resided at the Winnetka Residence, and owned and had access to the Northridge Residence. Defendant HARUTUNYAN claimed that she was employed by MJ Home Health.

38. Defendant MIHRAN PANOSYAN, aka "Mike Hope," was a resident of Winnetka, California. Defendant PANOSYAN resided at the Winnetka Residence, and had access to the Northridge Residence. Defendants PANOSYAN and HARUTYUNYAN were married to each other. Defendants PANOSYAN and SRAPYAN were cousins.

39. Winnetka Dental Lab was purportedly a dental supply business that used the Winnetka Residence as its physical address. Defendant HARUTUNYAN was listed as the owner and proprietor of Winnetka Dental Lab, according to bank and tax records.

40. The Granada Hills Residence was a single-family residence located in Granada Hills, California. Defendant HARUTYUNYAN owned and relatives of defendant PANOSYAN resided at the Granada Hills Residence.

Bank Accounts

41. Relevant bank accounts included:

1 a. An account at Chase Bank ending in x9283 in the
2 name of Prayer of Hope (the "Prayer of Hope Chase Bank x9283
3 Account"), on which A.M. was the sole listed signatory.

4 b. An account at Umpqua Bank ending in x4675 in the
5 name of Prayer of Hope (the "Prayer of Hope Umpqua Bank x4675
6 Account"), on which A.M. was the sole listed signatory.

7 c. An account at US Bank ending in x1703 in the name
8 of Dynamic (the "Dynamic US Bank x1703 Account"), on which I.S.
9 was the sole signatory. An account at Banc of California ending
10 in x5413 in the name of Dynamic (the "Dynamic Banc of California
11 x5413 Account"), on which I.S. was the sole listed signatory.

12 d. An account at Chase Bank ending in x8151 in the
13 name of House of Angels (the "House of Angels Chase Bank x8151
14 Account"), on which defendant ESPARZA was the sole signatory.

15 e. An account at Banc of California ending in x8303
16 in the name of MJ Home Health (the "MJ Home Health Banc of
17 California x8303 Account"), on which defendant FICHIDZHYAN was
18 the sole signatory.

19 f. An account at Banc of California ending in x9506
20 in the name of A.M. (the "A.M. Banc of California x9506
21 Account"), on which A.M. was the sole listed signatory.

22 g. An account at Wells Fargo Bank ending in x2861 in
23 the name of D.G. (the "D.G. Wells Fargo Bank x2861 Account"), on
24 which D.G. was the sole listed signatory.

25 h. An account at Bank of America ending in x2660 in
26 the name of defendant SRAPYAN (the "SRAPYAN Bank of America
27 x2660 Account"), on which defendant SRAPYAN was the sole
28 signatory.

1 i. An account at Citibank ending in x4913 in the
2 name of Winnetka Dental Lab (the "Winnetka Dental Lab Citibank
3 x4913 Account"), on which defendant HARUTYUNYAN was the sole
4 signatory.

5 j. An account at Bank of America ending in x0230 in
6 the name of defendant HARUTUNYAN (the "HARUTUNYAN Bank of
7 America x0230 Account"), on which defendant HARUTUNYAN was the
8 sole signatory.

9 B. OBJECTS OF THE CONSPIRACY

10 42. Beginning no later than in or around July 2019, and
11 continuing until at least in or around January 2023, in Los
12 Angeles County, within the Central District of California, and
13 elsewhere, defendants FICHIDZHYAN, ESPARZA, SRAPYAN,
14 HARUTYUNYAN, and PANOSYAN knowingly conspired with each other
15 and others known and unknown to the Grand Jury to commit the
16 following offenses against the United States:

17 a. To knowingly conduct and attempt to conduct
18 financial transactions, affecting interstate and foreign
19 commerce, involving the proceeds of specified unlawful activity,
20 namely, health care fraud conspiracy and health care fraud,
21 knowing that the property represented the proceeds of unlawful
22 activity and knowing that the transactions were designed in
23 whole and in part to conceal and disguise the nature, location,
24 source, ownership, and control of the proceeds of specified
25 unlawful activity, in violation of Title 18, United States Code,
26 Section 1956(a)(1)(B)(i); and

27 b. To knowingly engage and attempt to engage in
28 monetary transactions, affecting interstate commerce, in

1 criminally derived property of a value greater than \$10,000,
2 such property having been derived from a specified unlawful
3 activity, namely, health care fraud conspiracy and health care
4 fraud, in violation of Title 18, United States Code, Section
5 1957.

6 C. MANNER AND MEANS OF THE CONSPIRACY

7 43. The objects of the conspiracy were carried out, and
8 were to be carried out, in substance as follows:

9 a. After defendants FICHIDZHYAN, ESPARZA, and
10 SRAPYAN fraudulently obtained payments from Medicare as
11 described in Counts One through Five into accounts associated
12 with the Sham Hospices, defendants FICHIDZHYAN, ESPARZA,
13 SRAPYAN, HARUTYUNYAN, and PANOSYAN, together with others known
14 and unknown to the Grand Jury, would transfer and cause to be
15 transferred proceeds of the health care fraud scheme between and
16 among numerous assets and bank accounts – including, but not
17 limited to, assets and accounts in the names of the Sham
18 Hospices, MJ Home Health, Winnetka Dental Lab, the Impersonated
19 Identities, and the defendants – to conceal the nature,
20 location, source, ownership, and control of the fraud proceeds.

21 b. Defendants FICHIDZHYAN, ESPARZA, SRAPYAN,
22 PANOSYAN, and HARUTYUNYAN, together with others known and
23 unknown to the Grand Jury, would further dissipate, transform,
24 and conceal the nature, location, source, ownership, and control
25 of the fraud proceeds by using financial accounts and credit
26 cards in the names of Impersonated Identities.

27 c. Defendants FICHIDZHYAN, ESPARZA, SRAPYAN,
28 HARUTYUNYAN, and PANOSYAN, along with others known and unknown

1 to the Grand Jury, would also transfer criminally-derived funds,
2 including transferring over \$10,000 in individual transactions,
3 from accounts in the names of the Sham Hospices to accounts in
4 their own names or to purchase assets, including vehicles and
5 real estate, in their own names.

COUNTS TWELVE THROUGH FIFTEEN

[18 U.S.C. §§ 1956(a)(1)(B)(i), 2]

[Defendants FICHIDZHIAN, SRAPYAN, HARUTYUNYAN, and PANOSYAN]

44. The Grand Jury re-alleges paragraphs 1 through 26, 28, 29, 33, 36 through 41, and 43 of this Indictment here.

45. On or about the dates set forth below, in Los Angeles County, within the Central District of California, and elsewhere, the defendants below, together with others known and unknown to the Grand Jury, each aiding and abetting one another, knowingly conducted and willfully caused to be conducted the following financial transactions affecting interstate commerce, knowing the property involved represented the proceeds of some form of unlawful activity, and which property was, in fact, the proceeds of specified unlawful activity, namely, health care fraud conspiracy, in violation of Title 18, United States Code, Section 1349 and health care fraud, in violation of Title 18, United States Code, Section 1347 knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity:

COUNT	DEFENDANT	DATE	FINANCIAL TRANSACTION
TWELVE	SRAPYAN	4/20/2021	Transfer of \$16,700 from the Prayer of Hope Umpqua Bank x4675 Account by means of check into the D.G. Wells Fargo Bank x2861 Account
THIRTEEN	HARUTYUNYAN	11/12/2021	Transfer of \$61,200 from the Prayer of Hope Chase Bank x9283 Account by means of check into the Winnetka Dental Lab Citibank x4913 Account

COUNT	DEFENDANT	DATE	FINANCIAL TRANSACTION
FOURTEEN	PANOSYAN	3/2/2022	Transfer of \$46,600 from the Dynamic Banc of California x5413 Account by means of check into the A.M. Banc of California x9506 Account
FIFTEEN	FICHIDZHYAN	3/30/22	Transfer of \$75,500 from the Prayer of Hope Chase Bank x9283 Account by means of check into the MJ Home Health Banc of California x8303 Account

COUNTS SIXTEEN THROUGH TWENTY-ONE

[18 U.S.C. §§ 1957, 2]

[Defendants FICHIDZHYAN, ESPARZA, SRAPYAN, and HARUTYUNYAN]

46. The Grand Jury re-alleges paragraphs 1 through 26, 28, 29, 33, 36 through 41, and 43 of this Indictment here.

47. On or about the below dates, in Los Angeles County, within the Central District of California, and elsewhere, the following defendants, along with others known and unknown to the Grand Jury, each aiding and abetting one another, knowing that the property involved represented the proceeds of some form of unlawful activity, knowingly engaged in, and willfully caused others to knowingly engage in the below monetary transactions affecting interstate commerce in criminally derived property of a value greater than \$10,000, which property was, in fact, derived from specified unlawful activity, namely, health care fraud conspiracy, in violation of Title 18, United States Code, Section 1349, and health care fraud, in violation of Title 18, United States Code, Section 1347:

COUNT	DEFENDANT	DATE	MONETARY TRANSACTION
SIXTEEN	HARUTYUNYAN	10/27/2021	Electronic transfer of \$290,000 from the Dynamic US Bank x1703 Account to a private lender for a mortgage payment on the Granada Hills Residence
SEVENTEEN	HARUTYUNYAN	11/24/2021	Electronic transfer of \$50,000 from the Dynamic US Bank x1703 Account to a private lender for a mortgage payment on the Northridge Residence

COUNT	DEFENDANT	DATE	MONETARY TRANSACTION
EIGHTEEN	HARUTYUNYAN	11/26/2021	Transfer of \$31,200 from the Prayer of Hope Chase Bank x9283 Account by means of check written to "Susanna Harutyunyan" into the HARUTYUNYAN Bank of America x0230 Account
NINETEEN	SRAPYAN	12/3/2021	Transfer of \$20,500 from the Prayer of Hope Chase Bank x9283 Account by means of check written to "Karpis Srapyan" into the SRAPYAN Bank of America x2660 Account
TWENTY	ESPARZA	2/10/2022	Transfer of \$90,000 from the House of Angels Chase Bank x8151 Account by means of check to a car dealership for a vehicle owned by defendant ESPARZA
TWENTY-ONE	FICHIDZHYAN	3/10/2022	Electronic transfer of \$99,900 from the Dynamic Banc of California x5413 Account to a mortgage company for a mortgage payment on a residence owned by defendant FICHIDZHYAN

COUNTS TWENTY-TWO THROUGH TWENTY-THREE

[18 U.S.C. §§ 1035(a)(2), 2]

[Defendant FICHIZHYAN]

48. The Grand Jury re-alleges paragraphs 1, 8, 11, and 18-22 of this Indictment here.

49. Home health care was supportive health care provided to patients in their homes. Home health care was prescribed by a treating physician to a patient if the patient had developed an illness or injury that required skilled care, but not at the level provided by an acute facility such as a hospital or at a skilled nursing facility.

50. To qualify for the Medicare home health benefit, among other requirements, a beneficiary must: (1) have been confined to his or her home; (2) have been under the care of a physician; (3) have received services under a CMS Form 485 Home Health Certification and Plan of Care ("485") established and periodically reviewed by a physician; (4) have had a face-to-face encounter with a physician or approved provider within a specified period of time from the start of home health care; and (5) need skilled nursing care on an intermittent basis, physical therapy, speech-language pathology, or have a continuing need for occupational therapy.

51. On or about the below dates, in Los Angeles County, within the Central District of California, and elsewhere, in a matter involving a health care benefit program, namely, Medicare, and in connection with the delivery of and payment for health care benefits, items, and services, defendant

FICHIDZHYAN, along with others known and unknown to the Grand Jury, each aiding and abetting the other, knowingly and willfully made, and willfully caused others to make, the following materially false, fictitious, and fraudulent statements and representations, and made and used, and caused others to make and use, the following materially false writings and documents knowing the same to contain a materially false, fictitious, and fraudulent statement and entry:

COUNT	DATE	FALSE, FICTIOUS, AND FRAUDULENT STATEMENTS AND REPRESENTATIONS / FALSE WRITINGS AND DOCUMENTS
TWENTY-TWO	7/18/2019	Home Health Certification and Plan of Care, Form CMS 485, falsely stating that Physician 1 recertified A.Y. as confined to his/her home, authorized the plan of care, and that A.Y. remained under Physician 1's care
TWENTY-THREE	11/11/2019	Home Health Certification and Plan of Care, Form CMS 485, falsely stating that Physician 1 certified A.K. as confined to his/her home, authorized the plan of care, and that A.K. was under Physician 1's care

FORFEITURE ALLEGATION ONE

[18 U.S.C. § 982 (a) (7)]

1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 982(a)(7), in the event of any defendant's conviction of the offenses set forth in any of Counts One through Ten of this Indictment.

2. Any defendant so convicted shall forfeit to the United States of America the following:

(a) All right, title, and interest in any and all property, real or personal, that constitutes or is derived, directly or indirectly, from the gross proceeds traceable to the commission of any offense of conviction, including but not limited to the following:

(i) \$75,447.75 in funds seized from Banc of California account number ending in x8303;

(ii) \$2,626,324.73 in funds seized from Bank of California account ending in x9860;

(iii) The real property located at 16817 Rayen Street, Northridge, California, more particularly described as: Lot 1 of tract 17678, as per map recorded in book 598, pages 13 and 14 of Maps, in the Office Of The County Recorder of said County, Assessor's Parcel Number: 2688-027-001;

(iv) The real property located at 17404 San Fernando Mission Boulevard, Granada Hills, California more particularly described as Lot 224 of Tract No.

1 9816, in the City of Los Angeles, County of Los
2 Angeles, State of California, as per map recorded in
3 Book 138, Pages 7 to 9 inclusive of maps, in the
4 Office of the County Recorder of said County.
5 Excepting therefrom the Southerly 83 Feet Thereof,
6 Assessor's Parcel Number: 2712-005-012; and

7 (b) To the extent such property is not available for
8 forfeiture, a sum of money equal to the total value of the
9 property described in subparagraph (a).

10 3. Pursuant to Title 21, United States Code, Section
11 853(p), as incorporated by Title 18, United States Code, Section
12 982(b), any defendant so convicted shall forfeit substitute
13 property, up to the total value of the property described in the
14 preceding paragraph if, as the result of any act or omission of
15 said defendant, the property described in the preceding
16 paragraph, or any portion thereof: (a) cannot be located upon
17 the exercise of due diligence; (b) has been transferred, sold to
18 or deposited with a third party; (c) has been placed beyond the
19 jurisdiction of the court; (d) has been substantially diminished
20 in value; or (e) has been commingled with other property that
21 cannot be divided without difficulty.

FORFEITURE ALLEGATION TWO

[18 U.S.C. § 982 (a)(1)]

1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, notice is hereby given that the United States will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 982 (a)(1), in the event of any defendant's conviction of the offenses set forth in any of Counts Eleven through Twenty-One of this Indictment.

2. Any defendant so convicted shall forfeit to the United States of America the following:

(a) Any property, real or personal, involved in such offense, and any property traceable to such property, including but not limited to the following:

(i) \$75,447.75 in funds seized from Banc of California account number ending in x8303;

(ii) \$2,626,324.73 in funds seized from Bank of California account ending in x9860;

(iii) The real property located at 16817 Rayen Street, Northridge, California, more particularly described as: Lot 1 of tract 17678, as per map recorded in book 598, pages 13 and 14 of Maps, in the Office Of The County Recorder of said County, Assessor's Parcel Number: 2688-027-001;

(iv) The real property located at 17404 San Fernando Mission Boulevard, Granada Hills, California more particularly described as Lot 224 of Tract No. 9816, in the City of Los Angeles, County of Los Angeles, State of California, as per map recorded in

1 Book 138, Pages 7 to 9 inclusive of maps, in the
2 Office of the County Recorder of said County.
3 Excepting therefrom the Southerly 83 Feet Thereof,
4 Assessor's Parcel Number: 2712-005-012; and

5 (b) To the extent such property is not available for
6 forfeiture, a sum of money equal to the total value of the
7 property described in subparagraph (a).

8 3. Pursuant to Title 21, United States Code, Section
9 853(p), as incorporated by Title 18, United States Code, Section
10 982(b), any defendant so convicted shall forfeit substitute
11 property, up to the total value of the property described in the
12 preceding paragraph if, as a result of any act or omission of
13 said defendant, the property described in the preceding
14 paragraph, or any portion thereof (a) cannot be located upon the
15 exercise of due diligence; (b) has been transferred, sold to or
16 deposited with a third party; (c) has been placed beyond the
17 jurisdiction of the Court; (d) has been substantially diminished
18 in value; or (e) has been commingled with other property that
19 cannot be divided without difficulty.

FORFEITURE ALLEGATION THREE

[18 U.S.C. § 982 (a) (7) and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, notice is hereby given that the United States will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 982(a) (7) and Title 28, United States Code, Section 2461(c), in the event of any defendant's conviction of the offenses set forth in any of Counts Twenty-Two through Twenty-Three of this Indictment.

2. Any defendant so convicted shall forfeit to the United States of America the following:

(a) All right, title, and interest in any and all property, real or personal, that constitutes or is derived, directly or indirectly, from the gross proceeds traceable to the commission of any offense of conviction, including but not limited to the following:

(i) \$75,447.75 in funds seized from Banc of California account number ending in x8303;

(ii) \$2,626,324.73 in funds seized from Bank of California account ending in x9860;

(iii) The real property located at 16817 Rayen Street, Northridge, California, more particularly described as: Lot 1 of tract 17678, as per map recorded in book 598, pages 13 and 14 of Maps, in the Office Of The County Recorder of said County, Assessor's Parcel Number: 2688-027-001;

(iv) The real property located at 17404 San Fernando Mission Boulevard, Granada Hills, California

1 more particularly described as Lot 224 of Tract No.
2 9816, in the City of Los Angeles, County of Los
3 Angeles, State of California, as per map recorded in
4 Book 138, Pages 7 to 9 inclusive of maps, in the
5 Office of the County Recorder of said County.

6 Excepting therefrom the Southerly 83 Feet Thereof,
7 Assessor's Parcel Number: 2712-005-012; and

8 (b) To the extent such property is not available for
9 forfeiture, a sum of money equal to the total value of the
10 property described in subparagraph (a).

11 3. Pursuant to Title 21, United States Code, Section
12 853(p), as incorporated by Title 18, United States Code, Section
13 982(b)(1), and Title 18, United States Code, Section 982(b)(2),
14 any defendant so convicted shall forfeit substitute property,
15 if, by any act or omission of said defendant, the property
16 described in the preceding paragraph, or any portion thereof:

17 (a) cannot be located upon the exercise of due diligence; (b)
18 has been transferred, sold to, or deposited with a third party;
19 (c) has been placed beyond the jurisdiction of the court; (d)
20 has been substantially diminished in value; or (e) has been
21 commingled with other property that cannot be divided without
22 difficulty. Substitution of assets shall not be ordered,
23 however, where the convicted defendant acted merely as an
24 intermediary who handled but did not retain the property in the
25 course of the money laundering offense unless the defendant, in

26 ///

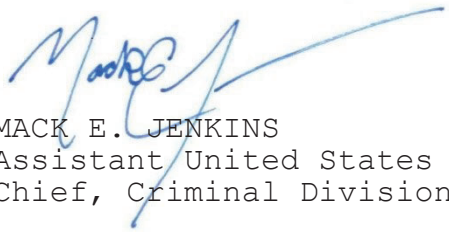
27 ///

1 committing the offense or offenses giving rise to the
2 forfeiture, conducted three or more separate transactions
3 involving a total of \$100,000 or more in any twelve-month
4 period.

5 A TRUE BILL

6
7 /s/
Foreperson

8
9 E. MARTIN ESTRADA
United States Attorney

10 
11
12 MACK E. JENKINS
Assistant United States Attorney
13 Chief, Criminal Division

14 KRISTEN A. WILLIAMS
Assistant United States Attorney
15 Chief, Major Frauds Section

16 ROGER A. HSIEH
Assistant United States Attorney
17 Deputy Chief, Major Frauds Section

18 GLENN S. LEON
Chief, Fraud Section
19 United States Department of Justice

20 SARAH E. EDWARDS
Trial Attorney, Fraud Section
21 United States Department of Justice

22 ERIC SCHMALE
Trial Attorney, Fraud Section
23 United States Department of Justice
24
25
26
27
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