

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2010 Grand Jury

CR 11 00072

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UNITED STATES OF AMERICA,
Plaintiff,

v.

MHER DARBINYAN,
aka "Mike,"
aka "Hollywood Mike,"
aka "Little Mike,"
aka "Capone,"
aka "Caps,"
aka "Maher,"
PARAMAZ BILEZIKCHYAN,
aka "Parik,"
aka "P,"
aka "Parnamas
Bileziktsian,"
aka "Bleziktsian Paramas,"
KARO YERKANYAN,
aka "Guilty,"
aka "Gator,"
aka "Kane,"
ARMAN SHAROPETROSIAN,
aka "Horse,"
aka "Dzi,"
HAYK KARAYAN,
aka "Hayko,"
aka "Whisper,"
ARMAN TANGABEKYAN,
aka "Spito,"
aka "Spitak,"
aka "Villager,"
aka "Thick Neck,"
aka "Armancho,"

No. CR
I N D I C T M E N T
[18 U.S.C. § 1962(d): Racketeer
Influenced and Corrupt
Organizations Conspiracy;
18 U.S.C. § 1201(c): Conspiracy
to Commit Kidnapping; 18 U.S.C.
§ 1201(a): Kidnapping; 18 U.S.C.
§ 1951(a): Conspiracy and
Interference with Commerce by
Threats and Violence; 18 U.S.C.
§ 1344: Bank Fraud; 18 U.S.C.
§ 1028A: Aggravated Identity
Theft; 18 U.S.C. § 1029: Access
Device Fraud; 18 U.S.C. § 371:
Conspiracy; 18 U.S.C.
§ 1001(a)(2): False Statement;
18 U.S.C. § 1014: False Statement
on a Loan Application; 18 U.S.C.
§ 1028: Identity Theft; 21 U.S.C.
§ 846: Conspiracy to Manufacture
and Possess with Intent to
Distribute Marijuana; 21 U.S.C.
§§ 841(a)(1), (b)(1)(B)(vii),
(b)(1)(C): Manufacture and
Possession with Intent to
Distribute Marijuana; 18 U.S.C.
§ 1955: Conducting Illegal
Gambling Business; 18 U.S.C.
§ 922(g)(1): Felon in Possession
of a Firearm/Ammunition;
18 U.S.C. § 2: Aiding and
Abetting]

EMU

1	EMIL AIRAPETIAN,)
	aka "Clever,")
2	aka "Emo,")
	ARMEN HOVANISSIAN,)
3	aka "Sniper,")
	aka "Arm,")
4	aka "Armen Hovannessian,")
	ROMAN TEROGANESYAN,)
5	aka "Lil Boy,")
	aka "Rome,")
6	aka "Roman Teroganesian,")
	aka "Arthur Teroganesian,")
7	EDGAR KHACHATRYAN,)
	aka "Gunner,")
8	aka "Lil Gunner,")
	aka "Edo,")
9	GARIK GALSTYAN,)
	aka "Stomper,")
10	aka "Stomps,")
	HARUT TOROSYAN,)
11	aka "Menace,")
	aka "Harout Torosyan,")
12	SOUREN SEROBYAN,)
	aka "Suro,")
13	VAZGEN TOPADZHIKYAN,)
	aka "Lucky,")
14	ARA FERMANYAN,)
	aka "Casper,")
15	aka "Cass,")
	DAVID MURADYAN,)
16	aka "Stranger,")
	aka "Davo,")
17	KAREN MARKOSIAN,)
	aka "Kar,")
18	aka "Garen,")
	KAREN ZAKARYAN,)
19	aka "Kond,")
	aka "Gond,")
20	aka "Kondik,")
	aka "Kar,")
21	ARTUR PEMBEJIAN,)
	aka "Cham,")
22	ARAM PETROSIAN,)
	aka "Tot,")
23	aka "Toto,")
	ARMAN KARAYAN,)
24	OGANES TEROGANESYAN,)
	aka "Hovo,")
25	aka "Hovik,")
	aka "Oganes Terognesyan,")
26	JACK GAMBARYAN,)
	aka "Zhak Gambarian,")
27	aka "Speedy,")
	RAYMOND TARVERDYAN,)
28	aka "Rye,")
	aka "Ray,")

1	VAHE MNATSAKANYAN,)
	aka "V,")
2	aka "Vahik,")
	ARMANDO MORENO,)
3	aka "Mando,")
	aka "Monkey,")
4	aka "Blackie,")
	ANDRANIK ALOYAN,)
5	aka "Andy,")
	aka "Ando,")
6	LUSINE OGANDGANYAN,)
	aka "Lusine Ogandjanian,")
7	aka "Luso,")
	GUSTAVO ORTEGA,)
8	aka "Bam Bam,")
	aka "Bams,")
9	aka "Gus,")
	GAGIK ZHAMKOCHYAN,)
10	aka "Manic,")
	aka "Panther,")
11	aka "Gago,")
	aka "Gag,")
12	SUREN TOROSYAN,)
	aka "Suro,")
13	aka "Sunny,")
	GRACHIA NALBANDYAN,)
14	aka "Raider,")
	aka "Puffy,")
15	aka "Crazy,")
	EDGAR YERKANYAN,)
16	aka "Edo,")
	KARINE MKRTCHYAN,)
17	RAFAEL PARSADANYAN,)
	aka "Raffi,")
18	aka "Raffo,")
	SIMON ANTONYAN,)
19	aka "Simo,")
	aka "Sim,")
20	GAREN CHOULDJIAN,)
	aka "Misak,")
21	GRIGOR GARIBYAN,)
	aka "Gokor,")
22	ARTUR GABRELYAN,)
	aka "Rubo,")
23	aka "Art,")
	ANDRANIK BAKHCHADJIAN,)
24	aka "Ando,")
	aka "Andranik Bakhcadjian,")
25	VARTENIE ANANIAN,)
	RAFAEL GONZALEZ-MUNOZ JR.,)
26	aka "Cisco,")
	aka "the Drink,")
27	KHACHATUR ARAKELYAN,)
	aka "Khecho,")
28	KARAPET JOEY KARAMUSYAN,)
	aka "Karo,")

1 HAROUTIOUN ARTHUR MELKONIAN,)
aka "Art,")
2 aka "Art from Montebello,")
ARSEN AYRANJIAN,)
3 ADAM DAVOODIAN,)
aka "Aram,")
4 ARAM KHACHATRYAN,)
TIGRAN SARKISYAN,)
5 aka "Tiko,")
MIGUEL AGUSTIN RAMIREZ,)
6 aka "Mugsy,")
aka "Mugs,")
7 HAGOP YAMALYAN,)
aka "Hago,")
8 MANUK TERZYAN,)
aka "Max,")
9 KAREN HESHAM SAMAWI,)
aka "Karen Hesham,")
10 JULIO CESAR RIVAS,)
aka "July,")
11 aka "Biggie,")
aka "Big Boy,")
12 ZHIRAYR KARAYAN,)
aka "Zhiro,")
13 aka "Jerry,")
SARKIS AVEDISIAN,)
14 aka "Sako,")
VARTAN AVEDISSIAN,)
15 aka "Vardan,")
aka "Voicebox,")
16 JOSEPH MARES,)
CATRINA BALDERRAMA,)
17 VARDAN AMIRKHANYAN,)
HOVANNES IGARIAN,)
18 aka "Hovo,")
NAIRA ASTGHIK TEROUNIAN,)
19 ARNOLD MORADIANS,)
aka "Arno,")
20 DEBRA MAY-LAWSON,)
aka "Sugar,")
21 RAFAEL ROGER ZENDEJAS,)
STEVEN WILSON,)
22 aka "Stutters,")
GEVORK KASABYAN,)
23 aka "Kash,")
MARAT SHAKHRAMANYAN,)
24 FNU LNU,)
aka "Musho," and)
25 FNU LNU,)
aka "David Petrosov,")
26)
27 Defendants.)
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1 The Grand Jury charges:

2 GENERAL ALLEGATIONS AND DEFINITIONS

3 At all times relevant to this Indictment, the following
4 definitions apply:

5 1. As used in this Indictment, "personal identifying
6 information" means any name, address, date of birth, social
7 security number, mother's maiden name, access code, driver's
8 license number, personal identification number ("PIN"), telephone
9 number, signature, and other means of identification commonly
10 provided by an individual in connection with obtaining access to
11 a bank account.

12 2. As used in this Indictment, "access device" means any
13 card, plate, code, account number, electronic serial number,
14 mobile identification number, PIN, or other telecommunications
15 service, equipment, or instrument identifier, or other means of
16 account access that can be used, alone or in conjunction with
17 another access device, to obtain money, goods, services, or any
18 other thing of value, or that can be used to initiate a transfer
19 of funds, as more fully defined in Title 18, United States Code,
20 Section 1029(e).

21 3. As used in this Indictment, "counterfeit access device"
22 means any access device that is counterfeit, fictitious, altered,
23 or forged, or an identifiable component of an access device or a
24 counterfeit access device, as more fully defined in Title 18,
25 United States Code, Section 1029(e).

1 4. As used in this Indictment, "unauthorized access
2 device" means any access device that is lost, stolen, expired,
3 revoked, cancelled, or obtained with intent to defraud, as more
4 fully defined in Title 18, United States Code, Section 1029(e).

5 5. As used in this Indictment, "device-making equipment"
6 means any equipment, mechanism, or impression designed or
7 primarily used for making an access device or a counterfeit
8 access device, as more fully defined in Title 18, United States
9 Code, Section 1029(e).

10 6. As used in this Indictment, a "skimming device" is a
11 device that can be attached to a debit or credit card keypad or a
12 point-of-sale terminal to record the information, including
13 account numbers, from the magnetic strips of cards that are
14 swiped into the keypad. A skimming device will also record the
15 key strokes entered into the keypad, including pin numbers and
16 access codes corresponding to the cards. The information
17 recovered from a skimming device can then be used to create
18 counterfeit and unauthorized access devices, thereby allowing
19 money to be withdrawn from an account holder's bank account
20 without the account holder's consent, knowledge, or
21 authorization.

22 7. As used in this Indictment, "identification document"
23 means a document made or issued by or under the authority of the
24 United States Government, a State, a political subdivision of a
25 State, a sponsoring entity of an event designated as a special
26 event of national significance, a foreign government, a political
27 subdivision of a foreign government, an international
28 governmental or an international quasi-governmental organization

1 which, when completed with information concerning a particular
2 individual, is of a type intended or commonly accepted for the
3 purpose of identification of individuals, as more fully defined
4 in Title 18, United States Code, Section 1028(d).

5 8. As used in this Indictment, "false identification
6 document" means a document of a type intended or commonly
7 accepted for the purposes of identification of individuals that
8 (a) is not issued by or under the authority of a governmental
9 entity, or was issued under the authority of a governmental
10 entity but was subsequently altered for purposes of deceit; and
11 (b) appears to be issued by or under the authority of the United
12 States Government, a State, a political subdivision of a State, a
13 sponsoring entity of an event designated by the President as a
14 special event of national significance, a foreign government, a
15 political subdivision of a foreign government, or an
16 international governmental or quasi-governmental organization, as
17 more fully defined in Title 18, United States Code, Section
18 1028(d).

19 9. As used in this Indictment, "means of identification"
20 means any name or number that may be used, alone or in
21 conjunction with any other information, to identify a specific
22 individual, including, among other things, (a) any name, social
23 security number, date of birth, official State or government
24 issued driver's license or identification number, alien
25 registration number, government passport number, employer or
26 taxpayer identification number; or (b) unique electronic
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1 identification number, address, or routing code, including a PIN,
2 as more fully defined in Title 18, United States Code, Section
3 1028(d).
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COUNT ONE

[18 U.S.C. § 1962(d)]

THE RACKETEERING ENTERPRISE

1. At all times relevant to this Indictment, defendants MHER DARBINYAN, also known as ("aka") "Mike," aka "Hollywood Mike," aka "Little Mike," aka "Capone," aka "Caps," aka "Maher" ("DARBINYAN"); PARAMAZ BILEZIKCHYAN, aka "Parik," aka "P," aka "Parnamas Bileziktsian," aka "Bleziktsian Paramas" ("BILEZIKCHYAN"); KARO YERKANYAN, aka "Guilty," aka "Gator," aka "Kane" ("K. YERKANYAN"); ARMAN SHAROPETROSIAN, aka "Horse," aka "Dzi" ("SHAROPETROSIAN"); HAYK KARAYAN, aka "Hayko," aka "Whisper" ("H. KARAYAN"); ARMAN TANGABEKYAN, aka "Spito," aka "Spitak," aka "Villager," aka "Thick Neck," aka "Armancho" ("TANGABEKYAN"); EMIL AIRAPETIAN, aka "Clever," aka "Emo" ("AIRAPETIAN"); ARMEN HOVANISSIAN, aka "Sniper," aka "Arm" ("HOVANISSIAN"); ROMAN TEROGANESYAN, aka "Lil Boy," aka "Rome," aka "Roman Teroganesian," aka "Arthur Teroganesian" ("R. TEROGANESYAN"); EDGAR KHACHATRYAN, aka "Gunner," aka "Lil Gunner," aka "Edo" ("E. KHACHATRYAN"); GARIK GALSTYAN, aka "Stomper," aka "Stomps" ("GALSTYAN"); HARUT TOROSYAN, aka "Menace," aka "Harout Torosyan" ("H. TOROSYAN"); SOUREN SEROBYAN, aka "Suro" ("SEROBYAN"); VAZGEN TOPADZHIKYAN, aka "Lucky" ("TOPADZHIKYAN"); ARA FERMANYAN, aka "Casper," aka "Cass" ("FERMANYAN"); DAVID MURADYAN, aka "Stranger," aka "Davo" ("MURADYAN"); KAREN MARKOSIAN, aka "Kar," aka "Garen" ("MARKOSIAN"); KAREN ZAKARYAN, aka "Kond," aka "Gond," aka "Kondik," aka "Kar" ("ZAKARYAN"); ARTUR PEMBEJIAN, aka "Cham" ("PEMBEJIAN"); ARAM PETROSIAN, aka "Tot," aka "Toto"

1 ("PETROSIAN"); ARMAN KARAYAN ("A. KARAYAN"); OGANES TEROGANESYAN,
2 aka "Hovo," aka "Hovik," aka "Oganes Terognesyan" ("O.
3 TEROGANESYAN"); JACK GAMBARYAN, aka "Zhak Gambarian," aka
4 "Speedy" ("GAMBARYAN"); RAYMOND TARVERDYAN, aka "Rye," aka "Ray"
5 ("TARVERDYAN"); VAHE MNATSAKANYAN, aka "V," aka "Vahik"
6 ("MNATSAKANYAN"); ARMANDO MORENO, aka "Mando," aka "Monkey," aka
7 "Blackie" ("MORENO"); ANDRANIK ALOYAN, aka "Andy," aka "Ando"
8 ("ALOYAN"); LUSINE OGANDGANYAN, aka "Lusine Ogandjanian," aka
9 "Luso" ("L. OGANDGANYAN"); and GUSTAVO ORTEGA, aka "Bam Bam," aka
10 "Bams," aka "Gus" ("ORTEGA"), and others known and unknown to the
11 Grand Jury, were members and associates of the Armenian Power
12 criminal organization ("Armenian Power"), whose members and
13 associates engaged in, among other things, murder, attempted
14 murder, kidnapping, robbery, extortion, conspiracy to traffic in
15 controlled substances, bank fraud, access device fraud, identity
16 theft, and illegal gambling. At all relevant times to this
17 Indictment, the Armenian Power criminal organization operated
18 within the Central District of California and elsewhere.

19 2. Armenian Power, including its leadership, members, and
20 associates, constitutes an "enterprise," as that term is defined
21 in Title 18, United States Code, Section 1961(4) -- that is, a
22 group of individuals associated in fact, although not a legal
23 entity, which is engaged in, and the activities of which affect,
24 interstate and foreign commerce. Armenian Power is an
25 international organized crime group, with its leadership based in
26 Los Angeles, that operates throughout the United States,
27 including the Central District of California, and
28 internationally. The enterprise constitutes an ongoing

1 organization whose members function as a continuing unit for a
2 common purpose of achieving the objectives of the enterprise.

3 3. Armenian Power, or "AP" as it is commonly referred to
4 by its members and associates, originated in Los Angeles County
5 in the 1980s. Armenian Power was formed in the East Hollywood
6 district of Los Angeles as a street gang whose membership
7 consisted primarily of individuals of Armenian descent, as well
8 as of other countries within the former Soviet bloc, in response
9 to other ethnic street gangs in the area. From its inception,
10 members and associates of Armenian Power have been involved in
11 various violent criminal acts, including murders, attempted
12 murders, kidnappings, robberies, extortions, and witness
13 intimidation, as well as drug trafficking and crimes involving
14 fraudulent activity.

15 4. Today, Armenian Power has been designated under
16 California state law as a criminal street gang and is believed to
17 have over 250 documented members, as well as hundreds of
18 associates. Armenian Power members and associates generally
19 frequent locations and businesses in Los Angeles County,
20 including the district of Hollywood, and the cities of Glendale,
21 Burbank, North Hollywood, West Hollywood, and Van Nuys. Control
22 of territory within these areas, however, is not as important to
23 Armenian Power members and associates as maintaining "hang outs"
24 to plan and commit crimes and further Armenian Power's purpose of
25 enriching its members and associates. Armenian Power members and
26 associates typically use "hang outs" that are owned or operated
27 by people who permit Armenian Power members and associates to use

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1 such locations due to fear, intimidation, or association with
2 Armenian Power.

3 5. Members of Armenian Power generally join the
4 organization after spending a period of time as associates of the
5 organization, during which time they are expected to put in
6 "work," in other words, commit violent acts, carry firearms, and
7 otherwise assist more senior Armenian Power members in committing
8 crimes. Members normally join Armenian Power by being "jumped
9 in," in other words, by being beaten by other Armenian Power
10 members for a short period of time, or by being "walked in," in
11 other words, by being vouched for or sponsored by a member of
12 Armenian Power. Armenian Power gang members typically identify
13 themselves through use of gang tattoos, tagging or graffiti, gang
14 signs, gang art, street names or monikers, and gang clothing.

15 6. Leadership and power within Armenian Power is generally
16 based on a combination of seniority and notoriety for committing
17 criminal acts. Members of Armenian Power who have spent extended
18 sentences in jail or prison and who have developed relationships
19 with members of powerful prison gangs generally carry more power
20 and status within the gang. Also, members who are known to have
21 committed acts of violence against others tend to wield more
22 power and authority within Armenian Power. At times, there have
23 been disputes and rivalries between members and associates of
24 Armenian Power regarding power, authority, and leadership within
25 the criminal enterprise, but members and associates of Armenian
26 Power nonetheless generally act in concert to oppose rival
27 criminal organizations and individuals.

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1 7. To enrich its members and associates, and preserve,
2 protect, enhance, and expand the power of the Armenian Power
3 criminal enterprise, Armenian Power members and associates
4 regularly carry out violent criminal acts, including murders,
5 attempted murders, kidnappings, robberies, extortions, and
6 witness intimidation. In order to carry out violent criminal
7 acts, eliminate rivals, intimidate and threaten others, and
8 promote the overall power and criminal reputation of the Armenian
9 Power criminal enterprise, Armenian Power members and associates
10 acquire and maintain firearms, ammunition, and other weapons, and
11 distribute firearms, ammunition, and other weapons to Armenian
12 Power members and associates.

13 8. Because one of the purposes of the Armenian Power
14 criminal enterprise is to enrich its members and associates,
15 Armenian Power members and associates engage in a wide variety of
16 crimes intended to unlawfully generate revenue, including
17 kidnappings, robberies, extortions, drug trafficking, bank fraud,
18 access device fraud, identity theft, and illegal gambling. In
19 order to effectively commit these crimes, Armenian Power members
20 rely extensively on a wide network of associates to assist in
21 carrying out their crimes. For instance, with regard to bank
22 fraud, Armenian Power relies on members and associates with the
23 knowledge and ability to unlawfully obtain bank customer
24 information, forge checks, and recruit check cashing "runners" to
25 illegally cash or deposit checks. Further, with regard to access
26 device fraud, Armenian Power relies on members and associates
27 with the knowledge and ability to create fraudulent debit cards
28 and credit cards. Armenian Power's network of associates is an

1 important part of its ability to successfully carry out a wide-
2 array of criminal activities. In carrying out fraud crimes,
3 members and associates of Armenian Power use, control, and
4 possess personal identifying information, access devices,
5 unauthorized access devices, counterfeit access devices, device-
6 making equipment, including skimming devices, identification
7 documents, false identification documents, and means of
8 identification, among other things.

9 9. Armenian Power is closely associated with an
10 organization known as the "Mexican Mafia," or "EME," which is
11 Spanish for the letter "M." As such, Armenian Power is sometimes
12 referred to as "AP-13," with the number "13" representing the
13 thirteenth letter of the alphabet, the letter "M." The Mexican
14 Mafia is an organized group of individuals that controls much of
15 the distribution of narcotics and other criminal activities
16 within California state prisons and some federal prisons. The
17 relationship between Armenian Power and the Mexican Mafia is
18 symbiotic: The Mexican Mafia, which has large numbers of
19 incarcerated members and associates, provides protection and
20 status to Armenian Power members and associates within prison.
21 In exchange, Armenian Power members and associates assist Mexican
22 Mafia members and associates with collecting money or "taxes"
23 within prison and outside prison, smuggling contraband, including
24 narcotics, into prison, and committing financial and fraud-
25 related crimes outside of prison. In addition, Armenian Power
26 members and associates and Mexican Mafia members and associates
27 tend to exchange high-value gifts, including vehicles and
28 weapons.

1 10. Due in part to their prior periods of incarceration --
2 for robbery, assault with a deadly weapon, financial fraud, and
3 other offenses -- and other connections, defendants DARBINYAN,
4 BILEZIKCHYAN, K. YERKANYAN, HOVANISSIAN, R. TEROGANESYAN, and
5 other members and associates of Armenian Power have forged
6 particularly strong ties to leaders and members of the Mexican
7 Mafia, and they are able to regularly access and communicate with
8 Mexican Mafia leaders. These strong ties to the Mexican Mafia,
9 as well as their seniority and lengthy experience in committing
10 violent criminal acts, gave defendants DARBINYAN, BILEZIKCHYAN,
11 K. YERKANYAN, HOVANISSIAN, R. TEROGANESYAN, as well as others
12 with close ties to them, an important leadership role in Armenian
13 Power.

14 11. Particularly through its leadership, Armenian Power
15 maintains ties to Russia and Armenia, to which most members and
16 associates generally retain strong ethnic and cultural ties.
17 Indeed, although most are fluent in English, Armenian Power
18 members and associates generally prefer to discuss their criminal
19 activities in the Armenian and Russian languages in order to
20 conceal their discussions to the extent possible. Traditionally,
21 Russian and Armenian organized crime centers on criminal elders
22 and high-level crime bosses, such as a "Thief-in-Law," or, in
23 Armenian, "Gogh." These "Thieves-in-Law" typically use their
24 authority within Russian and Armenian organized crime to resolve
25 disputes among criminals and others, authorize criminal activity,
26 and receive payments or tribute from organized crime members and
27 others.

1 12. Within Los Angeles and elsewhere, the leadership of
2 Armenian Power, including, among others, defendants DARBINYAN,
3 BILEZIKCHYAN, K. YERKANYAN, SHAROPETROSIAN, H. KARAYAN,
4 TANGABEKYAN, HOVANISSIAN, and R. TEROGANESYAN, operates as
5 equivalent to a "Thief-in-Law." Armenian Power leaders authorize
6 and carry out violent acts and large-scale criminal activity,
7 wield power and authority among Armenian organized crime figures
8 and others in the broader Armenian and Eurasian communities,
9 maintain ties with the Mexican Mafia and other non-Armenian
10 criminal groups, and often communicate with high-level Armenian
11 and Russian organized crime figures, both abroad and in the
12 United States. The leadership of Armenian Power deals directly
13 with traditional "Thieves-in-Law" and other high-level organized
14 crime figures, both within the United States and abroad, in order
15 to resolve criminal disputes and address criminal activities.
16 Because of their large network of members and associates,
17 demonstrated ability to carry out acts of violence, and strong
18 relationship with the Mexican Mafia, Armenian Power leaders
19 interact with traditional "Thieves-in-Law" as co-equals.
20 Moreover, at times, Armenian Power members and associates
21 confront and commit acts of violence against associates of
22 traditional "Thieves-in-Law," and often disregard their criminal
23 authority in favor of the criminal authority of the Armenian
24 Power leadership.

25 PURPOSES OF THE ENTERPRISE

26 13. The purposes of the Armenian Power criminal enterprise,
27 including its members and associates, include, but are not
28 limited to, the following:

1 a. Enriching members and associates of the Armenian
2 Power criminal enterprise through, among other things,
3 kidnapping, robbery, extortion, narcotics distribution, illegal
4 gambling, access device fraud, bank fraud, and other crimes;

5 b. Preserving and expanding the power and financial
6 profits of the Armenian Power criminal enterprise through
7 intimidation, threats of violence, and actual acts of violence;

8 c. Promoting, protecting, and enhancing the Armenian
9 Power criminal enterprise and the activities of its members and
10 associates.

11 MEANS AND METHODS OF THE ENTERPRISE

12 14. Among the means and methods by which defendants and
13 other members and associates of the Armenian Power criminal
14 enterprise participate in the conduct of the affairs of the
15 Armenian Power criminal enterprise are the following:

16 a. Members and associates of the Armenian Power
17 criminal enterprise commit, attempt to commit, and conspire to
18 commit acts of violence, including murder, kidnapping, robbery,
19 and extortion, to preserve and expand the power and financial
20 profits of the Armenian Power criminal enterprise.

21 b. Members and associates of the Armenian Power
22 criminal enterprise use violence and the threat of violence to
23 preserve and enhance the power and financial profits of members
24 and associates of the Armenian Power criminal enterprise.

25 c. Members and associates of the Armenian Power
26 criminal enterprise and their co-conspirators work together on a
27 wide-range of money-making schemes, including, among other
28 things, bank fraud, access device fraud, identity theft,

1 distribution of controlled substances, and illegal gambling, in
2 order to generate criminal proceeds and income for members and
3 associates of the Armenian Power criminal enterprise and their
4 co-conspirators.

5 d. Members and associates of the Armenian Power
6 criminal enterprise build, maintain, and preserve ties with
7 Mexican Mafia members and associates in order to protect Armenian
8 Power members and associates who are incarcerated, and to
9 promote, protect, and enhance the power and reputation of the
10 Armenian Power criminal enterprise.

11 THE RACKETEERING CONSPIRACY

12 15. Beginning on a date unknown to the Grand Jury, and
13 continuing to in or around January 2011, in Los Angeles County,
14 within the Central District of California, and elsewhere,
15 defendants DARBINYAN, BILEZIKCHYAN, K. YERKANYAN, SHAROPETROSIAN,
16 H. KARAYAN, TANGABEKYAN, AIRAPETIAN, HOVANISSIAN, R.
17 TEROGANESYAN, E. KHACHATRYAN, GALSTYAN, H. TOROSYAN, SEROBYAN,
18 TOPADZHIKYAN, FERMANYAN, MURADYAN, MARKOSIAN, ZAKARYAN,
19 PEMBEJIAN, PETROSIAN, A. KARAYAN, O. TEROGANESYAN, GAMBARYAN,
20 TARVERDYAN, MNATSAKANYAN, MORENO, ALOYAN, L. OGANDGANYAN, and
21 ORTEGA, and others known and unknown to the Grand Jury, being
22 persons employed by and associated with the Armenian Power
23 criminal enterprise described in Paragraphs One through Twelve of
24 this Count, which constitutes an "enterprise" as defined in Title
25 18, United States Code, Section 1961(4), which enterprise engaged
26 in, and the activities of which affected, interstate and foreign
27 commerce, unlawfully and knowingly combined, conspired,
28 confederated, and agreed together and with each other to violate

1 Title 18, United States Code, Section 1962(c), that is, to
2 conduct and participate, directly and indirectly, in the conduct
3 of the affairs of the enterprise through a pattern of
4 racketeering activity, as that term is defined in Title 18,
5 United States Code, Sections 1961(1) and 1961(5), consisting of
6 multiple acts indictable under:

7 A. Title 18, United States Code, Section 1028 (Identity
8 Theft);

9 B. Title 18, United States Code, Section 1029 (Access
10 Device Fraud);

11 C. Title 18, United States Code, Section 1344 (Bank
12 Fraud);

13 D. Title 18, United States Code, Section 1951
14 (Interference with Commerce by Threats or Violence);

15 E. Title 18, United States Code, Section 1955 (Prohibition
16 of Illegal Gambling Businesses);

17 and multiple acts involving:

18 A. Extortion, in violation of California Penal Code
19 Sections 32, 182, 518-520, and 664;

20 B. Kidnapping, in violation of California Penal Code
21 Sections 32, 182, 207-210, and 664;

22 C. Robbery, in violation of California Penal Code Sections
23 32, 182, 211, and 664;

24 and multiple acts involving the manufacture, distribution,
25 and possession with intent to distribute controlled substances,
26 in violation of Title 21, United States Code, Sections 846 and
27 841(a)(1).

28

1 It was a part of the conspiracy that each defendant agreed
2 that a conspirator would commit at least two acts of racketeering
3 activity in the conduct of the affairs of the Enterprise.

4 A. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE
5 ACCOMPLISHED

6 The object of the conspiracy was to be accomplished in
7 substance as follows:

8 1. Defendants DARBINYAN, BILEZIKCHYAN, K. YERKANYAN,
9 SHAROPETROSIAN, and H. KARAYAN, and others would direct and
10 coordinate the activities of the Armenian Power criminal
11 enterprise, including its members and associates, insofar as
12 those activities included the commission of crimes of violence,
13 including kidnapping and extortion, and fraud-related crimes,
14 including bank fraud and access device fraud.

15 2. Defendants DARBINYAN, BILEZIKCHYAN, K. YERKANYAN,
16 SHAROPETROSIAN, H. KARAYAN, TANGABEKYAN, AIRAPETIAN, HOVANISSIAN,
17 R. TEROGANESYAN, E. KHACHATRYAN, GALSTYAN, H. TOROSYAN,
18 FERMANYAN, MURADYAN, MARKOSIAN, ZAKARYAN, PEMBEJIAN, PETROSIAN,
19 O. TEROGANESYAN, GAMBARYAN, and L. OGANDGANYAN, and others would
20 carry out crimes of violence, including kidnapping and extortion,
21 to preserve and expand the power and financial profits of the
22 Armenian Power criminal enterprise.

23 3. Defendants DARBINYAN, BILEZIKCHYAN, and SHAROPETROSIAN,
24 who was incarcerated in California State Prison at times during
25 the conspiracy, would direct other members and associates of the
26 Armenian Power criminal enterprise to execute and attempt to
27 execute bank fraud schemes targeting the bank accounts of
28 unwitting victims. In particular, defendants DARBINYAN,

1 BILEZIKCHYAN, and SHAROPETROSIAN would direct their co-schemers,
2 including defendants TANGABEKYAN, MARKOSIAN, MNATSAKANYAN,
3 MORENO, ALOYAN, L. OGANDGANYAN, ORTEGA, and Karen Hesham Samawi
4 ("Samawi"), to, among other things, obtain, unlawfully and
5 without authorization, (a) bank account information for high-
6 value bank accounts; (b) personal identifying information for the
7 bank customer victims who owned the high-value bank accounts,
8 including names, social security numbers, and dates of birth; and
9 (c) checks for the high-value bank accounts. The co-schemers
10 would then create fraudulent checks with forged signatures and
11 direct other co-schemers to go to different bank branches to cash
12 and deposit the fraudulent checks. In this regard, defendants
13 and their co-schemers would often rely on "check runners," whose
14 function was to enter a bank and attempt to cash or deposit a
15 fraudulent check in exchange for a promised fee. Additionally,
16 defendant DARBINYAN would work with other co-schemers, including
17 defendants PETROSIAN, TARVERDYAN, and ORTEGA, to unlawfully
18 obtain debit card numbers from bank fraud victims using skimming
19 devices installed at stores, and then direct "runners" to
20 unlawfully and without authorization use the debit card numbers
21 to withdraw money from the victims' bank accounts. Further,
22 defendants BILEZIKCHYAN, K. YERKANYAN, and ALOYAN, and others
23 would use personal identifying information of bank fraud victims
24 to unlawfully and without authorization open bank accounts in the
25 names of the bank fraud victims in order to obtain money from,
26 among other things, fraudulent loans and lines of credit.

27 4. Defendants DARBINYAN, BILEZIKCHYAN, H. KARAYAN, H.
28 TOROSYAN, SEROBYAN, TOPADZHIKYAN, PETROSIAN, TARVERDYAN, ALOYAN,

1 and ORTEGA, and others often by using skimming devices, would
2 obtain, and direct others to obtain, access devices from
3 unwitting victims, with intent to defraud, and in order to create
4 counterfeit or unauthorized access devices.

5 5. Defendants DARBINYAN, BILEZIKCHYAN, K. YERKANYAN,
6 SHAROPETROSIAN, H. KARAYAN, HOVANISSIAN, R. TEROGANESYAN,
7 FERMANYAN, A. KARAYAN, O. TEROGANESYAN, GAMBARYAN, TARVERDYAN,
8 and MNATSAKANYAN, and others would manufacture, distribute, and
9 possess with intent to distribute controlled substances.

10 6. Defendants BILEZIKCHYAN, H. KARAYAN, R. TEROGANESYAN,
11 and GAMBARYAN, and others would conduct, finance, manage,
12 supervise, direct, and own all or part of illegal gambling
13 businesses.

14 7. Defendants DARBINYAN, BILEZIKCHYAN, and K. YERKANYAN,
15 and others would meet with defendants MORENO and Rafael Gonzalez-
16 Munoz Jr. ("Gonzalez-Munoz Jr."), and other Mexican Mafia members
17 and associates, to discuss relations between the Mexican Mafia
18 and members and associates of the Armenian Power criminal
19 enterprise, and defendants DARBINYAN, BILEZIKCHYAN, K. YERKANYAN,
20 and SHAROPETROSIAN, and others, would provide Mexican Mafia
21 members and associates with money, drugs, and other contraband,
22 as well as direction on committing fraud-related crimes, in order
23 to preserve and enhance the Armenian Power criminal enterprise's
24 relationship with the Mexican Mafia.

25 8. Defendants DARBINYAN, BILEZIKCHYAN, and K. YERKANYAN,
26 and others would regularly meet with Thieves-in-Law for purposes
27 of addressing disputes among criminal figures and others within
28 the Armenian and Eurasian communities. DARBINYAN, BILEZIKCHYAN,

1 and K. YERKANYAN, and others would also confront and challenge
2 Thieves-in-Law and their associates with regard to criminal
3 disputes and the Armenian Power criminal enterprise's asserted
4 control of criminal activities involving the Armenian and
5 Eurasian communities within Los Angeles and elsewhere.

6 9. Defendants DARBINYAN, BILEZIKCHYAN, K. YERKANYAN,
7 SHAROPETROSIAN, H. KARAYAN, HOVANISSIAN, R. TEROGANESYAN, E.
8 KHACHATRYAN, GALSTYAN, H. TOROSYAN, SEROBYAN, FERMANYAN,
9 MURADYAN, MARKOSIAN, ZAKARYAN, PEMBEJIAN, PETROSIAN, TARVERDYAN,
10 and ALOYAN, and others would obtain, use, and possess firearms
11 and ammunition to commit crimes of violence and in order to
12 preserve and enhance the Armenian Power criminal enterprise.

13 B. OVERT ACTS

14 In furtherance of the racketeering conspiracy, and to
15 accomplish the objects of the racketeering conspiracy, defendants
16 DARBINYAN, BILEZIKCHYAN, K. YERKANYAN, SHAROPETROSIAN, H.
17 KARAYAN, TANGABEKYAN, AIRAPETIAN, HOVANISSIAN, R. TEROGANESYAN,
18 E. KHACHATRYAN, GALSTYAN, H. TOROSYAN, SEROBYAN, TOPADZHIKYAN,
19 FERMANYAN, MURADYAN, MARKOSIAN, ZAKARYAN, PEMBEJIAN, PETROSIAN,
20 A. KARAYAN, O. TEROGANESYAN, GAMBARYAN, TARVERDYAN, MNATSAKANYAN,
21 MORENO, ALOYAN, L. OGANDGANYAN, and ORTEGA, and others known and
22 unknown to the Grand Jury, committed and caused to be committed
23 various overt acts, on or about the following dates, within the
24 Central District of California, and elsewhere, including, but not
25 limited to, the following:

26 Conspiracy to Extort Victim S.M.

27 1. On or about January 9, 2009, defendant K. YERKANYAN,
28 in a telephone conversation using coded language, discussed with

1 defendant HOVANISSIAN, who was incarcerated at the time, a plan
2 to force another jail inmate, victim S.M., to pay them money.

3 2. On or about January 9, 2009, defendant HOVANISSIAN,
4 in a telephone conversation using coded language, told defendant
5 K. YERKANYAN to call victim S.M. and threaten that HOVANISSIAN
6 would distribute compromising photographs of victim S.M. to other
7 jail inmates unless he paid them money.

8 3. On or about January 10, 2009, defendant K. YERKANYAN,
9 in a telephone conversation using coded language, told defendant
10 HOVANISSIAN that K. YERKANYAN wanted to visit victim S.M. in jail
11 in order to extort him using the compromising photographs, and
12 HOVANISSIAN said he would send K. YERKANYAN victim S.M.'s
13 information to facilitate this visit.

14 Extortion of Victim M.M.

15 4. On or about June 27, 2009, defendant SHAROPETROSIAN,
16 in a telephone conversation using coded language, discussed with
17 defendant DARBINYAN seizing and holding victim M.M. until victim
18 M.M.'s father brought them money.

19 5. On or about June 29, 2009, defendant SHAROPETROSIAN
20 initiated a three-way call with defendant DARBINYAN and victim
21 M.M. and threatened victim M.M. with bodily harm if he did not
22 pay money to SHAROPETROSIAN and DARBINYAN.

23 6. On or about June 30, 2009, defendant DARBINYAN, in a
24 telephone conversation using coded language, told defendant
25 SHAROPETROSIAN that DARBINYAN had met with victim M.M. and
26 threatened him with physical violence if he did not pay money,
27 and SHAROPETROSIAN said victim M.M. should pay \$70,000 to
28 defendant L. OGANDGANYAN and additional money to them.

1 7. On or about July 3, 2009, defendant SHAROPETROSIAN,
2 in a telephone conversation using coded language, told defendant
3 DARBINYAN to threaten victim M.M. with physical harm if victim
4 M.M. did not pay money to SHAROPETROSIAN and DARBINYAN.

5 8. On or about July 4, 2009, defendant SHAROPETROSIAN,
6 in a telephone conversation using coded language, told defendant
7 DARBINYAN to inform victim M.M. that victim M.M. would be
8 kidnapped for three months if he did not pay money to
9 SHAROPETROSIAN.

10 9. On or about July 4, 2009, defendant SHAROPETROSIAN
11 initiated a three-way call with defendant DARBINYAN and victim
12 M.M., and SHAROPETROSIAN and DARBINYAN told victim M.M. that they
13 would kidnap victim M.M. if victim M.M. and his family did not
14 pay money to SHAROPETROSIAN, DARBINYAN, and defendant L.
15 OGANDGANYAN.

16 10. On or about July 6, 2009, defendant SHAROPETROSIAN,
17 in a telephone conversation using coded language, discussed with
18 defendant DARBINYAN how much money they intended to obtain from
19 victim M.M. that day using threats of physical harm.

20 11. On or about July 6, 2009, defendant DARBINYAN, in a
21 telephone conversation using coded language, told victim M.M.
22 that DARBINYAN would hurt victim M.M. if victim M.M. did not pay
23 him money.

24 12. On July 8, 2009, defendant DARBINYAN, in a telephone
25 conversation using coded language, demanded money from victim
26 M.M.

27 13. On July 9, 2009, defendants DARBINYAN and
28 SHAROPETROSIAN, in a telephone conversation using coded language,

1 discussed how to obtain money from victim M.M., and
2 SHAROPETROSIAN said that some of the money would go to defendant
3 L. OGANDGANYAN.

4 14. On August 30, 2009, defendant SHAROPETROSIAN, using
5 coded language on the telephone, demanded money from victim M.M.

6 15. On or about August 31, 2009, defendant
7 SHAROPETROSIAN, in a telephone conversation using coded language,
8 instructed victim M.M. to meet an unindicted co-conspirator to
9 deliver money to her under threat of physical harm.

10 16. On or about September 3, 2009, defendant
11 SHAROPETROSIAN, in a telephone conversation using coded language,
12 demanded \$100,000 from victim M.M. under threat of physical harm.

13 17. On or about September 4, 2009, defendant
14 SHAROPETROSIAN, in a telephone conversation using coded language,
15 told victim M.M. that victim M.M. would be killed.

16 18. On or about September 11, 2009, defendants
17 SHAROPETROSIAN and L. OGANDGANYAN spoke with victim M.M. in a
18 three-way call and, using coded language, demanded money from
19 victim M.M. under threat of physical harm.

20 19. On or about October 28, 2009, defendant
21 SHAROPETROSIAN, in a telephone conversation using coded language,
22 instructed victim M.M. to make deposits into certain bank
23 accounts and to use either Western Union or Moneygram to send
24 money to SHAROPETROSIAN and his co-conspirators under threat of
25 violence.

1 20. On or about October 29, 2009, defendants
2 SHAROPETROSIAN and AIRAPETIAN, in a telephone conversation using
3 coded language, demanded \$1,875 from victim M.M. and threatened
4 victim M.M. with violence if victim M.M. did not pay the money.

5 21. On or about October 29, 2009, defendant AIRAPETIAN,
6 in a telephone conversation using coded language, arranged a
7 meeting with victim M.M. for the purpose of obtaining money from
8 victim M.M., and, later that day, obtained approximately \$1,900
9 from victim M.M. under threat of physical harm.

10 22. On or about October 29, 2009, defendant AIRAPETIAN,
11 in a telephone conversation using coded language, demanded
12 \$10,000 from victim M.M. and threatened to disfigure victim M.M.
13 if he did not pay.

14 23. On or about October 30, 2009, defendant
15 SHAROPETROSIAN, in a telephone conversation using coded language,
16 instructed victim M.M. to make deposits into particular bank
17 accounts under threat of physical harm.

18 24. On October 31, 2009, defendant SHAROPETROSIAN, in a
19 telephone conversation using coded language, demanded \$2,000 from
20 victim M.M.

21 25. On or about November 1, 2009, defendant
22 SHAROPETROSIAN, in a telephone conversation using coded language,
23 demanded \$10,000 from victim M.M.

24 26. On or about November 2, 2009, defendant
25 SHAROPETROSIAN, in a telephone conversation using coded language,
26 demanded that victim M.M. take \$1,000 to an unindicted co-
27 conspirator that night.

28

1 27. On or about November 2, 2009, victim M.M. paid \$500 to
2 the unindicted co-conspirator.

3 28. On or about November 2, 2009, defendant
4 SHAROPETROSIAN, in a telephone conversation using coded language,
5 told victim M.M. that SHAROPETROSIAN would slaughter victim M.M.
6 if victim M.M. did not deposit money as directed by
7 SHAROPETROSIAN.

8 29. On or about November 4, 2009, defendant
9 SHAROPETROSIAN, in a telephone conversation using coded language,
10 demanded \$2,500 in cash from victim M.M. and said he would send
11 someone over to pick up the money from victim M.M.

12 30. On or about November 4, 2009, a person known to the
13 Grand Jury picked up \$2,000 from victim M.M.

14 31. On or about November 6, 2009, defendant
15 SHAROPETROSIAN, in a telephone conversation using coded language,
16 asked victim M.M. whether victim M.M. had sent the money demanded
17 by SHAROPETROSIAN under threat of physical harm using Western
18 Union or Moneygram.

19 32. On or about November 12, 2009, defendant L.
20 OGANDGANYAN and others known and unknown to the Grand Jury met
21 with victim M.M. and demanded money from victim M.M.

22 33. On or about November 19, 2009, defendant L.
23 OGANDGANYAN, in a telephone conversation using coded language,
24 told victim M.M. that victim M.M. had to pay her money under
25 threat of physical harm.

26
27
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1 34. On or about November 21, 2009, defendant L.
2 OGANDGANYAN, in a telephone conversation using coded language,
3 threatened to kill victim M.M.'s family if victim M.M. did not
4 pay money to L. OGANDGANYAN.

5 Conspiracy to Extort Victim L.A.

6 35. On or about July 9, 2009, defendants DARBINYAN and
7 BILEZIKCHYAN, in a telephone conversation using coded language,
8 told an unindicted co-conspirator that DARBINYAN and BILEZIKCHYAN
9 needed to catch victim L.A. and physically assault him, and
10 BILEZIKCHYAN said that if they catch victim L.A., there is a lot
11 of money to be made.

12 36. On or about July 10, 2009, defendant DARBINYAN, in a
13 telephone conversation using coded language, told defendant
14 MARKOSIAN that DARBINYAN and defendant BILEZIKCHYAN wanted to
15 find victim L.A. and that victim L.A. owed BILEZIKCHYAN
16 approximately \$7,000.

17 37. On or about July 10, 2009, defendant DARBINYAN, in a
18 telephone conversation using coded language, told an unindicted
19 co-conspirator that if DARBINYAN found victim L.A., they would
20 make money.

21 Conspiracy to Extort Victims Z and L.K.

22 38. On or about August 20, 2009, defendant DARBINYAN, in
23 a telephone conversation using coded language, told defendant
24 ZAKARYAN that DARBINYAN and defendant K. YERKANYAN were driving
25 to the "Chicken House" restaurant in the Hollywood district of
26 Los Angeles, California, to confront victims Z, L.K., and others,
27 who DARBINYAN and his associates believed owed them money, and
28 ZAKARYAN said he would be there.

1 39. On or about August 20, 2009, defendant DARBINYAN, in
2 a telephone conversation using coded language, told defendant
3 MARKOSIAN that DARBINYAN was on his way to Hollywood to confront
4 victims Z, L.K., and others, and MARKOSIAN said he would be
5 there.

6 40. On or about August 20, 2009, defendant DARBINYAN, in
7 a telephone conversation using coded language, told defendant
8 PEMBEJIAN that DARBINYAN was on his way to Hollywood to confront
9 victims Z, L.K., and others.

10 41. On or about August 20, 2009, defendant BILEZIKCHYAN,
11 in a telephone conversation using coded language, told defendant
12 DARBINYAN to fill the area of the "Chicken House" restaurant with
13 Armenian Power members and associates to intimidate and
14 physically assault victims Z, L.K., and others.

15 42. On or about August 20, 2009, defendant DARBINYAN, in
16 a telephone conversation using coded language, told defendant
17 PEMBEJIAN that DARBINYAN and defendant K. YERKANYAN were at the
18 "Chicken House" restaurant and had some firearms but wanted more,
19 and PEMBEJIAN said he would meet DARBINYAN there.

20 43. On or about August 20, 2009, defendant BILEZIKCHYAN,
21 in a telephone conversation using coded language, told an
22 unindicted co-conspirator that Armenian Power members and
23 associates would soon arrive at the "Chicken House" restaurant to
24 back up defendants DARBINYAN and K. YERKANYAN, and BILEZIKCHYAN
25 informed the unindicted co-conspirator that DARBINYAN and K.
26 YERKANYAN had firearms.

27 44. On or about August 20, 2009, defendants DARBINYAN, K.
28 YERKANYAN, E. KHACHATRYAN, GALSTYAN, H. TOROSYAN, SEROBYAN,

1 FERMANYAN, MURADYAN, and ZAKARYAN, and other members and
2 associates of Armenian Power, were present at the "Chicken House"
3 restaurant while in possession of at least five firearms,
4 including a Springfield Armory model XD .45 caliber handgun, a
5 Sig Sauer model SP 2340 .40 caliber handgun, an Israel Military
6 Industries model Baby Desert Eagle .40 caliber handgun, a Heckler
7 & Koch model USP .40 caliber handgun, and a Glock model 17 9
8 millimeter caliber handgun, and numerous rounds of ammunition.

9 45. On or about August 20, 2009, defendant GAMBARYAN, in
10 a telephone conversation using coded language, reported to
11 defendant BILEZIKCHYAN that GAMBARYAN was watching police
12 officers detaining defendants DARBINYAN and K. YERKANYAN, and
13 other members and associates of Armenian Power, at the "Chicken
14 House" restaurant.

15 46. On or about August 20, 2009, defendant BILEZIKCHYAN,
16 in a telephone conversation using coded language, told defendant
17 GAMBARYAN that defendants DARBINYAN and K. YERKANYAN belong to
18 Armenian Power and that by going against DARBINYAN and K.
19 YERKANYAN, victims Z, L.K., and others had gone against Armenian
20 Power.

21 47. On or about August 20, 2009, defendant BILEZIKCHYAN,
22 in a telephone conversation using coded language, told defendant
23 GAMBARYAN that BILEZIKCHYAN was going to physically assault
24 victims Z, L.K., and others for going against Armenian Power.

25 48. On or about August 21, 2009, defendant BILEZIKCHYAN,
26 in a telephone conversation using coded language, told defendant
27 ZAKARYAN that defendants DARBINYAN and K. YERKANYAN were both
28 BILEZIKCHYAN's brothers and were members of Armenian Power, and

1 ZAKARYAN told BILEZIKCHYAN that he had been at the "Chicken
2 House" restaurant with other Armenian Power members and
3 associates, but was able to avoid being arrested.

4 49. On or about August 21, 2009, defendant PEMBEJIAN, in
5 a telephone conversation using coded language, told defendant
6 DARBINYAN that he had been in the vicinity of the "Chicken House"
7 restaurant and saw police officers there, and DARBINYAN said that
8 there were many guys from Armenian Power there and that police
9 officers found multiple firearms at that location.

10 50. On or about August 21, 2009, defendant DARBINYAN, in
11 a telephone conversation using coded language, told defendant
12 ZAKARYAN that he intended to punish victims Z, L.K., and others
13 for making decisions regarding criminal activity in Los Angeles
14 without DARBINYAN's authorization.

15 51. On or about August 21, 2009, defendant DARBINYAN, in
16 a telephone conversation using coded language, told an unindicted
17 co-conspirator that DARBINYAN told victims Z, L.K., and others
18 that DARBINYAN is the only one who lays down the law in Los
19 Angeles, and that when he saw that victims Z, L.K., and others
20 had many people with them, he made a couple of calls and filled
21 the place (referring to the "Chicken House" restaurant) with
22 members and associates of Armenian Power.

23 52. On or about August 21, 2009, defendant DARBINYAN, in
24 a telephone conversation using coded language, told an unindicted
25 co-conspirator that when the police arrived at the "Chicken
26 House" restaurant, he told the junior Armenian Power members and
27 associates who were acting tough to shut up so that the police
28 would not violate DARBINYAN's parole.

1 53. On or about August 26, 2009, defendant DARBINYAN, in
2 a telephone conversation using coded language, told defendant
3 SHAROPETROSIAN that he and other members and associates of
4 Armenian Power intended to assault victims Z, L.K., and others at
5 the "Chicken House" restaurant, but police officers showed up and
6 found their firearms.

7 54. On or about August 27, 2009, defendant DARBINYAN, in
8 a telephone conversation using coded language, told defendant
9 PETROSIAN that victims Z and L.K. were not in a position to make
10 decisions with regard to criminal matters in this town, and that
11 DARBINYAN did not care that victim L.K. was a godson to a Thief-
12 in-Law.

13 55. On or about August 28, 2009, defendant DARBINYAN, in
14 a telephone conversation using coded language, told defendant
15 ZAKARYAN that DARBINYAN did not care whether victim Z was backed
16 by a Thief-in-Law.

17 56. On or about September 2, 2009, defendant DARBINYAN,
18 in a telephone conversation using coded language, told an
19 unindicted co-conspirator that he had threatened victim Z and his
20 guys with physical violence, and DARBINYAN told victim Z that he
21 had one week to pay money to DARBINYAN.

22 57. On or about October 10, 2009, defendant DARBINYAN, in
23 a telephone conversation using coded language, told defendant
24 ZAKARYAN that the police had seized at least four of their
25 firearms at the "Chicken House" restaurant.

26 58. On or about October 11, 2009, defendant DARBINYAN, in
27 a telephone conversation using coded language, asked defendant
28 MNATSAKANYAN to help DARBINYAN find some firearms because

1 DARBINYAN had recently lost some firearms, and MNATSAKANYAN
2 agreed to assist DARBINYAN in this regard.

3 59. On or about October 12, 2009, defendant DARBINYAN, in
4 a telephone conversation using coded language, told defendant K.
5 YERKANYAN that he had acquired a firearm similar to K.
6 YERKANYAN's firearm with the laser scope that had been left at
7 the "Chicken House" restaurant, and DARBINYAN said he wanted to
8 deliver the firearm to K. YERKANYAN.

9 Conspiracy to Extort Victims S.M. and E

10 60. On or about November 13, 2009, defendant DARBINYAN,
11 in a telephone conversation using coded language, discussed with
12 defendant BILEZIKCHYAN a plan to extort victim S.M. for money
13 that DARBINYAN believed he was owed and that involved criminal
14 figures in Moscow, Russia, and some Thieves-in-Law, and
15 BILEZIKCHYAN said DARBINYAN should feel free to extort victim
16 S.M. and that BILEZIKCHYAN would physically assault the Thieves-
17 in-Law involved.

18 61. On or about November 13, 2009, defendant DARBINYAN,
19 in a telephone conversation using coded language, told defendant
20 PEMBEJIAN that DARBINYAN was going to have victim S.M. forced
21 into a car and that he would take \$50,000 away from victim S.M.

22 62. On or about November 13, 2009, an unindicted co-
23 conspirator, in a telephone conversation using coded language,
24 told defendant DARBINYAN that victim E was involved with the
25 money DARBINYAN believed victim S.M. owed to him, and DARBINYAN
26 said he wanted victim E caught and brought to him.

27 63. On or about November 13, 2009, defendant DARBINYAN,
28 in a telephone conversation using coded language, spoke to

1 defendant MARKOSIAN about finding victim E, and DARBINYAN said if
2 MARKOSIAN could not find victim E, then DARBINYAN would find
3 victim E in a sadder manner.

4 64. On or about November 14, 2009, defendant DARBINYAN,
5 in a telephone conversation using coded language, told defendant
6 PEMBEJIAN that DARBINYAN was going to physically assault victim
7 S.M., and DARBINYAN said he was upset that criminal figures in
8 Moscow were getting involved in this instance.

9 65. On or about November 14, 2009, defendant DARBINYAN,
10 in a telephone conversation using coded language, told defendant
11 BILEZIKCHYAN that DARBINYAN had found victim E and sent some
12 people to get him, and that DARBINYAN learned that victim S.M.
13 had sent the \$50,000 DARBINYAN believed was owed to him to
14 another criminal figure.

15 66. On or about November 14, 2009, defendant
16 BILEZIKCHYAN, in a telephone conversation using coded language,
17 told defendant DARBINYAN that victim S.M. would bring DARBINYAN
18 the money at issue with a broken hand.

19 67. On or about November 15, 2009, defendant DARBINYAN,
20 in a telephone conversation using coded language, told an
21 unindicted co-conspirator that DARBINYAN knew that victim S.M.
22 was lying to him and that DARBINYAN was going to punish victim
23 S.M.

24 68. On or about November 15, 2009, defendant
25 BILEZIKCHYAN, in a telephone conversation using coded language,
26 told defendant DARBINYAN that they would take victim S.M.'s
27 money, and BILEZIKCHYAN said he and DARBINYAN make the justice
28 here.

1 69. On or about November 19, 2009, an unindicted co-
2 conspirator, in a telephone conversation using coded language,
3 told defendant DARBINYAN that he was taking defendant TANGABEKYAN
4 to the airport to fly to Las Vegas, Nevada, and meet with victim
5 S.M.

6 70. On or about November 22, 2009, defendant TANGABEKYAN,
7 in a telephone conversation using coded language, told defendant
8 DARBINYAN he had spoken with victim S.M. and let victim S.M. know
9 that DARBINYAN was a significant criminal figure in America, and
10 TANGABEKYAN said victim S.M. is going to send the money to
11 DARBINYAN.

12 71. On or about November 22, 2009, defendant DARBINYAN,
13 in a telephone conversation using coded language, told an
14 unindicted co-conspirator that they were going to take \$50,000
15 from victim S.M. and that DARBINYAN was going to take additional
16 money as well.

17 72. On or about November 22, 2009, defendant DARBINYAN,
18 in a telephone conversation using coded language, told defendant
19 TANGABEKYAN that he was going to take \$50,000 from victim S.M.

20 Kidnapping and Extortion of Victim G.A.

21 73. On or about November 25, 2009, defendant
22 BILEZIKCHYAN, in a telephone conversation using coded language,
23 told defendant Tigran Sarkisyan ("Sarkisyan") to pick him up to
24 drive BILEZIKCHYAN to the Downtown district of Los Angeles,
25 California.

26 74. On or about November 25, 2009, defendant
27 BILEZIKCHYAN, in a telephone conversation using coded language,
28 told defendant K. YERKANYAN that BILEZIKCHYAN was headed to

1 downtown Los Angeles with defendant Sarkisyan in order to kidnap
2 victim G.A., and BILEZIKCHYAN asked K. YERKANYAN to contact
3 defendants H. KARAYAN and PETROSIAN to advise them to be prepared
4 to assist in kidnapping victim G.A., and K. YERKANYAN agreed to
5 do so.

6 75. On or about November 25, 2009, defendant
7 BILEZIKCHYAN, in a telephone conversation using coded language,
8 told defendant K. YERKANYAN to talk to defendant PETROSIAN about
9 where they should take victim G.A. after they seize him, and K.
10 YERKANYAN said he would do so.

11 76. On or about November 25, 2009, defendant
12 BILEZIKCHYAN, in a telephone conversation using coded language,
13 told defendant O. TEROGANESYAN that he would be at O.
14 TEROGANESYAN's auto body shop, MR Auto Body Collision, in Los
15 Angeles, California, in about an hour, and O. TEROGANESYAN told
16 BILEZIKCHYAN he would be there for sure.

17 77. On or about November 25, 2009, defendant
18 BILEZIKCHYAN, in a telephone conversation using coded language,
19 told defendant Sarkisyan that he was with victim G.A. now and
20 that victim G.A. was not going to come home anymore.

21 78. On or about November 25, 2009, defendant
22 BILEZIKCHYAN, in a telephone conversation using coded language,
23 told defendant Suren Torosyan ("S. Torosyan") that BILEZIKCHYAN
24 would need him and asked S. Torosyan to keep his telephone on,
25 and S. Torosyan agreed to do so.

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1 79. On or about November 25, 2009, defendant K.
2 YERKANYAN, in a telephone conversation using coded language, told
3 defendant H. KARAYAN that he and others had taken victim G.A.,
4 who was with them, and H. KARAYAN offered to help the kidnapers.

5 80. On or about November 25, 2009, defendant
6 BILEZIKCHYAN, in a telephone conversation using coded language,
7 told defendant Sarkisyan that BILEZIKCHYAN had told victim G.A.
8 that victim G.A. had to pay BILEZIKCHYAN \$100,000 in order to be
9 released and that victim G.A. had to pay BILEZIKCHYAN a total of
10 \$400,000 to avoid being kidnapped in the future.

11 81. On or about November 25, 2009, defendant
12 BILEZIKCHYAN, in a telephone conversation using coded language,
13 told defendant Sarkisyan that, at the location where they had
14 taken and held victim G.A., there was a big hole in the ground
15 and when victim G.A. saw the hole, he started crying in fear for
16 his life.

17 82. On or about November 25, 2009, defendant
18 BILEZIKCHYAN, in a telephone conversation using coded language,
19 told defendant Sarkisyan that they had released victim G.A. and
20 that defendant K. YERKANYAN and others took victim G.A. away from
21 defendant O. TEROGANESYAN's auto body shop to collect money.

22 83. On or about November 25, 2009, defendant
23 BILEZIKCHYAN, in a telephone conversation using coded language,
24 told defendant Sarkisyan that BILEZIKCHYAN thought that victim
25 G.A. might die from a heart attack, and that when victim G.A. saw
26 that there were a few people with masks involved in his
27 kidnapping, victim G.A. wet his pants.

28

1 84. On or about November 25, 2009, defendant
2 BILEZIKCHYAN, in a telephone conversation using coded language,
3 told defendant S. Torosyan that BILEZIKCHYAN was at defendant O.
4 TEROGANESYAN's auto body shop counting the money that victim G.A.
5 had paid in exchange for his release, and S. Torosyan offered to
6 help them.

7 85. On or about November 25, 2009, defendant PETROSIAN,
8 in a telephone conversation using coded language, told defendant
9 BILEZIKCHYAN that PETROSIAN was sitting outside victim G.A.'s
10 building waiting for victim G.A. to bring additional money.

11 86. On or about November 25, 2009, defendant
12 BILEZIKCHYAN, in a telephone conversation using coded language,
13 told defendant PETROSIAN that BILEZIKCHYAN had been worried that
14 victim G.A.'s heart was going to stop while they were holding
15 him.

16 87. On or about November 25, 2009, defendant
17 BILEZIKCHYAN, in a telephone conversation using coded language,
18 told an unindicted co-conspirator that, prior to BILEZIKCHYAN's
19 kidnapping of victim G.A., a Thief-in-Law had attempted to
20 mediate BILEZIKCHYAN's dispute with victim G.A., but BILEZIKCHYAN
21 did not like the Thief-in-Law's proposed resolution, so
22 BILEZIKCHYAN decided to do things his own way and kidnap victim
23 G.A.

24 88. On or about November 26, 2009, defendant
25 BILEZIKCHYAN, in a telephone conversation using coded language,
26 discussed with defendant K. YERKANYAN splitting \$200,000 in
27 proceeds obtained as a result of the kidnapping of victim G.A.
28

1 89. On or about December 24, 2009, defendant H. KARAYAN,
2 in a telephone conversation using coded language, told defendant
3 BILEZIKCHYAN that victim G.A. had a lot of gold hidden, and
4 BILEZIKCHYAN told H. KARAYAN to tell victim G.A. that Monday was
5 the last day to pay the money owed in connection with the
6 kidnapping.

7 Additional Acts Of Extortion And Assault

8 90. On or about August 19, 2006, in the North Hollywood
9 district of Los Angeles, defendant HOVANISSIAN, and others known
10 and unknown to the Grand Jury, pointed a firearm at victim A.M.
11 and yelled "Armenian Power."

12 91. On or about June 25, 2009, defendant DARBINYAN, in a
13 telephone conversation using coded language, told an unindicted
14 co-conspirator that DARBINYAN was going to physically assault
15 victim G.S. and that DARBINYAN would force victim G.S. to give
16 DARBINYAN forty percent of victim G.S.'s corporation.

17 92. On or about July 10, 2009, defendant DARBINYAN, in a
18 telephone conversation using coded language, warned defendant
19 MNATSAKANYAN to discipline victim S, otherwise DARBINYAN would
20 call Armenia and have victim S's head taken off.

21 93. On or about July 15, 2009, defendant SHAROPETROSIAN,
22 in a telephone conversation using coded language, told defendant
23 DARBINYAN that victim M.G. owed SHAROPETROSIAN approximately
24 \$37,500, and that if victim M.G. did not pay SHAROPETROSIAN the
25 money, SHAROPETROSIAN would have victim M.G. beaten the next time
26 victim M.G. visits Yerevan, Armenia.

27 94. On or about July 16, 2009, defendant TANGABEKYAN, in
28 a telephone conversation using coded language, told defendant

1 DARBINYAN that TANGABEKYAN was observing police officers
2 conducting a traffic stop of victim K.S., and DARBINYAN told
3 TANGABEKYAN that DARBINYAN wanted victim K.S. physically
4 assaulted once police officers had left victim K.S.'s presence.

5 95. On or about July 16, 2009, defendant TANGABEKYAN, in
6 a telephone conversation using coded language, told defendant
7 DARBINYAN that TANGABEKYAN would continue to watch victim K.S.
8 and they would eventually get victim K.S.

9 96. On or about August 13, 2009, defendant DARBINYAN, in
10 a telephone conversation using coded language, discussed with
11 defendant BILEZIKCHYAN a rumor started by victim A.Y. that
12 BILEZIKCHYAN had threatened an organized crime figure and his
13 family, and DARBINYAN said he wanted to find victim A.Y. and
14 physically assault him.

15 97. On or about August 19, 2009, defendant DARBINYAN, in
16 a telephone conversation using coded language, told an unindicted
17 co-conspirator that he was looking for victim V in relation to a
18 stabbing involving victim V and DARBINYAN's godson, and DARBINYAN
19 said that victim V's connections with other Armenian organized
20 crime figures did not matter and if victim V does not come to see
21 DARBINYAN, then victim V might as well leave town.

22 98. On or about August 19, 2009, defendant DARBINYAN, in
23 a telephone conversation using coded language, told an unindicted
24 co-conspirator that he planned to physically assault victim V.

25 99. On or about August 19, 2009, defendant DARBINYAN, in
26 a telephone conversation using coded language, told victim V,
27 among other things, that in the world of Armenian organized
28

1 crime, victim V does not have enough power to settle any dispute
2 with DARBINYAN.

3 100. On or about September 6, 2009, defendant
4 BILEZIKCHYAN, in a telephone conversation using coded language,
5 told defendant K. YERKANYAN that there were many Armenians
6 driving luxury cars and wearing expensive jewelry where
7 BILEZIKCHYAN was in Palm Springs, California, and BILEZIKCHYAN
8 told K. YERKANYAN that K. YERKANYAN should join BILEZIKCHYAN in
9 Palm Springs so that they could rob other Armenians and make lots
10 of money.

11 101. On or about September 8, 2009, defendant DARBINYAN,
12 in a telephone conversation using coded language, told an
13 unindicted co-conspirator that DARBINYAN was planning on
14 kidnapping victim A.Y. from victim A.Y.'s house, and DARBINYAN
15 said he was going to beat victim A.Y. and drag him out of his
16 house.

17 102. On or about September 28, 2009, an unindicted co-
18 conspirator, in a telephone conversation using coded language,
19 told defendant DARBINYAN that victim G has a lot of money, and
20 that DARBINYAN should tell victim G that DARBINYAN would be
21 victim G's godfather and protect victim G in order to force
22 victim G to give DARBINYAN money, and DARBINYAN said he would
23 call victim G.

24 103. On or about January 22, 2010, defendant K. YERKANYAN,
25 in a telephone conversation using coded language, told an
26 unindicted co-conspirator that K. YERKANYAN was in Las Vegas,
27 Nevada, and wanted the address for an unspecified victim so that
28 K. YERKANYAN could assault and rob the unspecified victim.

1 104. On or about January 24, 2010, defendant K. YERKANYAN,
2 in a telephone conversation using coded language, told defendant
3 ZAKARYAN that K. YERKANYAN was going to assault an unspecified
4 victim the next time K. YERKANYAN saw the unspecified victim.

5 Acts of Robbery and Witness Intimidation

6 105. In or around November 2006, defendant MURADYAN
7 conspired with other Armenian Power gang members to intimidate a
8 witness to a robbery committed by Armenian Power gang members so
9 that the witness would not testify against the Armenian Power
10 gang members involved in the robbery.

11 106. On or about June 25, 2007, defendant FERMANYAN, and
12 others known and unknown to the Grand Jury, entered a gas station
13 in Burbank, California, and robbed victim A.M. at gunpoint.

14 Acts Regarding Firearm Possession and Distribution

15 107. On or about August 6, 2009, defendant DARBINYAN, in a
16 telephone conversation using coded language, told defendant
17 TARVERDYAN that there was a police car following him, and
18 TARVERDYAN warned DARBINYAN that there was a firearm inside the
19 car DARBINYAN was driving.

20 108. On or about August 13, 2009, defendant DARBINYAN, in
21 a telephone conversation using coded language, discussed
22 purchasing various firearms, including three firearms for
23 approximately \$1,500 each, with defendant PEMBEJIAN.

24 109. On or about August 13, 2009, defendant DARBINYAN, in
25 a telephone conversation using coded language, offered defendant
26 ZAKARYAN a firearm for \$2,500 and a smaller firearm for
27 approximately \$1,500, and ZAKARYAN said he wanted the smaller
28 firearm for sure.

1 110. On or about August 14, 2009, defendant DARBINYAN, in
2 a telephone conversation using coded language, told defendant
3 PETROSIAN that defendant ZAKARYAN should bring \$1,500 to pay for
4 the firearm, and PETROSIAN agreed to meet DARBINYAN.

5 111. On or about August 14, 2009, defendant DARBINYAN, in
6 a telephone conversation using coded language, told defendant
7 TARVERDYAN that DARBINYAN had about two or three firearms that
8 could be easily concealed, and TARVERDYAN said he would pick one
9 up from DARBINYAN.

10 112. On or about August 16, 2009, defendant ZAKARYAN, in a
11 telephone conversation using coded language, told defendant
12 DARBINYAN that an unindicted co-conspirator would be bringing two
13 short firearms, and DARBINYAN said he wanted one of the short
14 firearms as soon as possible.

15 113. On or about August 16, 2009, defendant DARBINYAN, in
16 a telephone conversation using coded language, told defendant
17 ZAKARYAN that if DARBINYAN is caught by police officers with the
18 short firearm, DARBINYAN would be prosecuted and sentenced to 35
19 years in prison because the short firearm was an assault rifle.

20 114. On or about August 24, 2009, defendant DARBINYAN, in
21 a telephone conversation using coded language, told an unindicted
22 co-conspirator that DARBINYAN liked the firearm that the
23 unindicted co-conspirator had provided to DARBINYAN, and
24 DARBINYAN said that law enforcement officers had recently taken
25 four of their firearms.

26 115. On or about September 9, 2009, defendant K.
27 YERKANYAN, in a telephone conversation using coded language, told
28

1 defendant E. KHACHATRYAN that K. YERKANYAN wanted to purchase a
2 handgun with a silencer for approximately \$1,300.

3 116. On or about September 15, 2009, defendant DARBINYAN,
4 in a telephone conversation using coded language, told an
5 unindicted co-conspirator to bring DARBINYAN a rifle.

6 117. On or about October 13, 2009, defendant DARBINYAN, in
7 a telephone conversation using coded language, told defendant
8 BILEZIKCHYAN that DARBINYAN had been at Hatsatoun restaurant in
9 Glendale, California, earlier that evening when some criminal
10 figures made DARBINYAN mad and he fired a gun that defendant E.
11 KHACHATRYAN had brought with him.

12 118. On or about October 13, 2009, defendant BILEZIKCHYAN,
13 in a telephone conversation using coded language, told defendant
14 E. KHACHATRYAN to drive defendant DARBINYAN home following the
15 shooting at Hatsatoun restaurant because DARBINYAN was on parole
16 and would get in big trouble if he were caught shooting a gun.

17 119. On or about November 14, 2009, defendant K.
18 YERKANYAN, in a telephone conversation using coded language,
19 spoke with an unindicted co-conspirator about exchanging K.
20 YERKANYAN's current handgun for a ten millimeter handgun.

21 120. On or about November 23, 2009, defendant Miguel
22 Agustin Ramirez ("Ramirez"), in a telephone conversation using
23 coded language, offered firearms to defendant DARBINYAN.

24 121. On or about November 23, 2009, defendant DARBINYAN,
25 in a telephone conversation using coded language, told defendant
26 PEMBEJIAN that they should stop to see some firearms that
27 defendant Ramirez was offering to DARBINYAN.

28

1 122. On or about November 24, 2009, defendant DARBINYAN,
2 in a telephone conversation using coded language, asked defendant
3 SEROBYAN to pick up firearms from defendant Gevork Kasabyan
4 ("Kasabyan"), and SEROBYAN said he would pick up the guns and put
5 them in the trunk of his car.

6 123. On or about November 24, 2009, defendants DARBINYAN
7 and SEROBYAN possessed three firearms, namely, a Smith & Wesson
8 model 638-2 .38 caliber revolver, a Star model 30M 9 millimeter
9 caliber semi-automatic pistol, and an Intratec model Tec-22 .22
10 caliber semi-automatic pistol, as well as multiple rounds of
11 ammunition.

12 124. On or about November 24, 2009, defendant K.
13 YERKANYAN, in a telephone conversation using coded language,
14 agreed to lend his handgun to an unindicted co-conspirator.

15 125. On or about November 30, 2009, defendant
16 BILEZIKCHYAN, in a telephone conversation using coded language,
17 reminded defendant K. YERKANYAN to hide his weapon.

18 126. On or about November 30, 2009, defendant DARBINYAN,
19 in a telephone conversation using coded language, discussed with
20 defendant PEMBEJIAN delivering an Omega firearm to an Armenian
21 organized crime elder as a gift.

22 127. On or about December 1, 2009, defendant DARBINYAN, in
23 a telephone conversation using coded language, made plans with
24 defendant PEMBEJIAN to meet PEMBEJIAN and an Armenian organized
25 crime elder at the Montage Hotel in Beverly Hills to deliver the
26 Omega firearm.

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1 128. On or about December 1, 2009, defendant DARBINYAN
2 possessed a firearm, namely, an Omega Arms model Omega III 30-06
3 caliber bolt action rifle.

4 129. On or about December 30, 2009, defendants
5 BILEZIKCHYAN and K. YERKANYAN, and others known and unknown to
6 the Grand Jury, met with defendant Gonzalez-Munoz Jr., a member
7 of the Mexican Mafia, and his associates at a restaurant in
8 Glendale, California, and BILEZIKCHYAN received from Gonzalez-
9 Munoz Jr. a gun magazine containing approximately 35 rounds of
10 .45 caliber ammunition.

11 130. On or about December 30, 2009, defendant
12 BILEZIKCHYAN, in a telephone conversation using coded language,
13 told an unindicted co-conspirator that BILEZIKCHYAN had received
14 as a gift from defendant Gonzalez-Munoz Jr. a .45 caliber high-
15 capacity gun magazine, and that BILEZIKCHYAN and defendant K.
16 YERKANYAN had never seen anything like it.

17 131. On or about December 30, 2009, defendant
18 BILEZIKCHYAN, in a telephone conversation using coded language,
19 told defendant Marat Shakhramanyan ("Shakhramanyan") to go to the
20 restaurant in Glendale, tell the owner that BILEZIKCHYAN sent
21 him, and take home what the owner gives him.

22 132. On or about December 30, 2009, acting on behalf of
23 defendant BILEZIKCHYAN, defendant Shakhramanyan picked up a black
24 plastic bag containing the .45 caliber high-capacity gun magazine
25 from the restaurant in Glendale.

26 133. On or about December 30, 2009, defendant
27 BILEZIKCHYAN, in a telephone conversation using coded language,
28 told defendant O. TEROGANESYAN that defendant Shakhramanyan had

1 been stopped and arrested after picking up the .45 caliber high-
2 capacity gun magazine.

3 134. On or about January 19, 2010, defendant K. YERKANYAN,
4 in a telephone conversation using coded language, told defendant
5 E. KHACHATRYAN that junior Armenian Power gang members and
6 associates should bring firearms to a cemetery where other
7 Armenian Power gang members would be gathering later that day.

8 135. On or about January 19, 2010, defendants E.
9 KHACHATRYAN, GALSTYAN, and Grachia Nalbandyan ("Nalbandyan"), and
10 others known and unknown to the Grand Jury, possessed firearms
11 and ammunition, namely, a Sig Sauer P220 .45 caliber semi-
12 automatic handgun, a Maadi Helwan 9 millimeter caliber handgun,
13 and fifteen rounds of ammunition.

14 136. On or about January 19, 2010, defendants BILEZIKCHYAN
15 and K. YERKANYAN, in a telephone conversation using coded
16 language, discussed posting bail for the Armenian Power gang
17 members who had been caught by the police with firearms earlier
18 that day.

19 137. On or about January 19, 2010, defendant BILEZIKCHYAN,
20 in a telephone conversation using coded language, told defendant
21 K. YERKANYAN that BILEZIKCHYAN was concerned that the seizure of
22 firearms earlier that day from Armenian Power gang members meant
23 that the police had been conducting surveillance on Armenian
24 Power gang members.

25 138. On or about January 19, 2010, defendant GALSTYAN, in
26 a telephone conversation using coded language, told defendants
27 BILEZIKCHYAN and K. YERKANYAN that police officers had found
28

1 firearms in the car occupied by defendants E. KHACHATRYAN and
2 GALSTYAN.

3 139. On or about January 20, 2010, defendant BILEZIKCHYAN,
4 in a telephone conversation using coded language, told an
5 unindicted co-conspirator that the unindicted co-conspirator
6 should not tell anyone that it was BILEZIKCHYAN who posted bail
7 for the Armenian Power gang members caught with firearms on
8 January 19, 2010.

9 140. On or about January 24, 2010, defendant K. YERKANYAN,
10 in a telephone conversation using coded language, spoke with
11 defendant E. KHACHATRYAN about purchasing another firearm.

12 141. On or about January 27, 2010, defendant K. YERKANYAN,
13 in a telephone conversation using coded language, told defendant
14 GAMBARYAN that officers had gone to GAMBARYAN's residence at 4055
15 Lankershim Boulevard, #434, in Los Angeles, California, and
16 arrested defendants E. KHACHATRYAN, GALSTYAN, and Grigor
17 Garibyan, and GAMBARYAN informed K. YERKANYAN that there were
18 firearms at his place.

19 142. On or about January 27, 2010, defendants GAMBARYAN
20 and E. KHACHATRYAN, and other members and associates of Armenian
21 Power, possessed two firearms, namely, a Smith & Wesson model 659
22 9 millimeter caliber handgun, and a Colt model 1908 Automatic .25
23 caliber handgun.

24 143. On or about February 10, 2010, defendant K. YERKANYAN
25 possessed a firearm, namely, a Beretta model 92FS 9 millimeter
26 caliber semi-automatic pistol, and fifteen rounds of ammunition,
27 at his residence in Tujunga, California.

28

1 144. On or about February 10, 2010, defendant K.
2 YERKANYAN, in a telephone conversation using coded language, told
3 an unindicted co-conspirator that police officers had searched
4 his house that day and found a firearm.

5 145. On or about September 3, 2010, defendant ALOYAN
6 possessed a Llama .22 caliber pistol and numerous rounds of
7 ammunition.

8 Bank Fraud Targeting Victim P.J.C.

9 146. On or about January 26, 2009, defendant DARBINYAN, in
10 a telephone conversation using coded language, discussed with
11 defendant ORTEGA using "check runners" to cash or deposit
12 fraudulent checks associated with a bank account in the name of
13 victim P.J.C.

14 147. On or about January 26, 2009, defendant DARBINYAN, in
15 a telephone conversation using coded language, told defendant
16 ORTEGA to bring "check runners" to DARBINYAN's location.

17 148. On or about January 26, 2009, defendant Rafael Roger
18 Zendejas ("Zendejas") cashed check number 3439, made payable to
19 "Rafael Zendejas" in the amount of \$10, drawn on Bank of America
20 account number xxxxx-42953, in the name of victim P.J.C.

21 149. On or about January 26, 2009, defendant Joseph Mares
22 ("Mares") deposited check number 3442, made payable to "Joseph
23 Mares" in the amount of \$15, drawn on Bank of America account
24 number xxxxx-42953, in the name of victim P.J.C.

25 150. On or about January 28, 2009, defendants DARBINYAN,
26 ORTEGA, and Manuk Terzyan ("Terzyan"), in telephone conversations
27 using coded language, discussed committing bank fraud on a bank
28 account in the name of victim P.J.C.

1 151. On or about January 28, 2009, defendant Julio Cesar
2 Rivas ("Rivas"), in a telephone conversation using coded
3 language, told defendant DARBINYAN that defendant Zendejas had
4 entered a bank to cash a fraudulent check associated with a bank
5 account in the name of victim P.J.C. and that the check amount
6 was \$5,900.

7 152. On or about January 28, 2009, defendant Zendejas
8 attempted to cash check number 3444, made payable to "Rafael
9 Roger Zendejas" in the amount of \$5,900, drawn on Bank of America
10 account number xxxxx-42953, in the name of victim P.J.C.

11 153. On or about January 28, 2009, defendant DARBINYAN, in
12 a telephone conversation using coded language, discussed with
13 defendant Rivas that police officers were about to arrest
14 defendant Zendejas while he was attempting to cash a fraudulent
15 check.

16 154. On or about January 28, 2009, defendant DARBINYAN, in
17 a telephone conversation using coded language, told defendant
18 ORTEGA to call defendant Debra May-Lawson ("May-Lawson") to see
19 if she had successfully cashed fraudulent checks associated with
20 a bank account in the name of victim P.J.C.

21 155. On or about January 28, 2009, defendant May-Lawson
22 cashed check number 3438, made payable to "Debra Jane May Lawson"
23 in the amount of \$5,600, and check number 3443, made payable to
24 "Debra Jane May-Lawson" in the amount of \$5,600, both drawn on
25 Bank of America account number xxxxx-42953, in the name of victim
26 P.J.C.

1 Bank Fraud Targeting Victim G.F.

2 156. On or about March 9, 2009, defendant TANGABEKYAN
3 transferred \$45,000 from Bank of America account number
4 xxxxx-68791, a trust account in the name of victim G.F., to Bank
5 of America account number xxxxx-40707, a checking account in the
6 name of victim G.F.

7 157. On or about March 16, 2009, defendant DARBINYAN, in a
8 telephone conversation using coded language, discussed with
9 defendant TANGABEKYAN giving defendant MORENO, a Mexican Mafia
10 member, a fraudulent check as a gift, and DARBINYAN told
11 TANGABEKYAN that they were planning on using the fraudulent
12 checks they had that week.

13 158. On or about March 16, 2009, defendant DARBINYAN told
14 defendant MNATSAKANYAN to meet him so that DARBINYAN could
15 introduce MNATSAKANYAN to defendant MORENO.

16 159. On or about March 16, 2009, defendants DARBINYAN,
17 TANGABEKYAN, MNATSAKANYAN, MORENO, and Samawi met together at
18 Natalie's Peruvian Seafood restaurant in the Hollywood area of
19 Los Angeles, California, to discuss, among other things, bank
20 fraud.

21 160. On or about March 16, 2009, defendant DARBINYAN, in a
22 telephone conversation using coded language, told defendant
23 TANGABEKYAN to prepare fraudulent checks for a bank account in
24 the name of victim G.F. so that defendant MORENO could take them
25 to Orange County, California, to deposit or cash them, and
26 TANGABEKYAN asked DARBINYAN to find out what amount TANGABEKYAN
27 should write on the fraudulent checks.

28

1 161. On or about March 16, 2009, defendant DARBINYAN, in a
2 telephone conversation using coded language, told defendants
3 MORENO and Samawi that DARBINYAN would have a fraudulent check
4 for a bank account in the name of victim G.F. deposited into
5 Samawi's bank account and that the deposited amount would be
6 approximately \$26,300.

7 162. On or about March 16, 2009, defendant DARBINYAN, in a
8 telephone conversation using coded language, talked to defendant
9 MORENO about getting MORENO expensive items.

10 163. On or about March 16, 2009, defendant DARBINYAN, in a
11 telephone conversation using coded language, told defendant
12 TANGABEKYAN that they had to get defendant MORENO fraudulent
13 checks as promised in order to insure they were not disgraced.

14 164. On or about March 17, 2009, defendant DARBINYAN, in a
15 telephone conversation using coded language, spoke to defendant
16 MORENO about people messing up, and MORENO told DARBINYAN to
17 break a bone, a kneecap, or a finger in such instances.

18 165. On or about March 17, 2009, defendant TANGABEKYAN, in
19 a telephone conversation using coded language, told defendant
20 DARBINYAN that fraudulent checks he had prepared and that were
21 associated with a bank account in the name of victim G.F. were
22 ready.

23 166. On or about March 17, 2009, defendants DARBINYAN,
24 TANGABEKYAN, MORENO, Terzyan, and Vartan Avedissian
25 ("Avedissian") met at AKA Euro Sports, in Studio City,
26 California, to discuss, among other things, bank fraud.

27 167. On or about March 17, 2009, defendant DARBINYAN, in a
28 telephone conversation using coded language, discussed with

1 defendant MNATSAKANYAN account information for a bank account in
2 the name of victim G.F.

3 168. On or about March 17, 2009, defendant Terzyan, in a
4 telephone conversation using coded language, told defendant
5 DARBINYAN that he was approaching a bank to deposit a fraudulent
6 check drawn on victim G.F.'s bank account into defendant Samawi's
7 bank account.

8 169. On or about March 17, 2009, defendant Terzyan
9 deposited check number 1462, made payable to "Karen Hesham" in
10 the amount of \$26,400, drawn on Bank of America account number
11 xxxxx-40707, in the name of victim G.F.

12 170. On or about March 18, 2009, defendant DARBINYAN, in a
13 telephone conversation using coded language, told defendants
14 MORENO and Samawi to withdraw funds fraudulently deposited into
15 Samawi's bank account by purchasing cashier's checks in amounts
16 between \$6,500 and \$7,000.

17 171. On or about March 18, 2009, defendant Samawi
18 purchased two cashier's checks, each in the amount of \$6,500, and
19 withdrew additional cash from her Bank of America account,
20 bearing account number xxxxx-75143, using funds that had been
21 fraudulently deposited into her account from the account of
22 victim G.F.

23 172. On or about March 18, 2009, defendants MORENO and
24 Samawi, in a telephone conversation using coded language, told
25 defendant DARBINYAN that they had gotten two \$6,500 cashier's
26 checks and withdrawn \$1,000 in cash, and DARBINYAN told them they
27 should take more money out of the bank account in cash.

28

1 173. On or about March 18, 2009, defendant DARBINYAN, in
2 telephone conversations using coded language, discussed with
3 defendants TANGABEKYAN and MORENO fraudulently depositing
4 additional money into defendant Samawi's bank account from victim
5 G.F.'s bank account.

6 174. On or about March 18, 2009, defendant DARBINYAN, in a
7 telephone conversation using coded language, told defendant
8 MORENO to write between \$35,000 and \$40,000 on a blank check
9 drawn from victim G.F.'s bank account and to deposit the check.

10 175. On or about March 18, 2009, defendants MORENO and
11 Samawi deposited check number 1463, made payable to "Karen
12 Hesham" in the amount of \$38,000, drawn on Bank of America
13 account number xxxxx-40707, in the name of victim G.F.

14 176. On or about March 19, 2009, defendant DARBINYAN, in a
15 telephone conversation using coded language, told defendant
16 TANGABEKYAN that defendants MORENO and Samawi had deposited a
17 fraudulent check drawn from victim G.F.'s bank account, and that
18 the check amount was \$38,000.

19 177. On or about March 19, 2009, defendant DARBINYAN, in a
20 telephone conversation using coded language, discussed with
21 defendants TANGABEKYAN and MORENO splitting the proceeds of the
22 bank fraud involving victim G.F. between themselves.

23 178. On or about March 19, 2009, defendant Avedissian, in
24 a telephone conversation using coded language, discussed with
25 defendant DARBINYAN retrieving proceeds of the bank fraud
26 involving victim G.F. from defendant MORENO.

27 179. On or about March 19, 2009, defendant TANGABEKYAN
28 transferred \$40,000 from Bank of America account number xxxxx-

1 68791, a trust account in the name of victim G.F., to Bank of
2 America account number xxxxx-40707, a checking account in the
3 name of victim G.F.

4 Bank Fraud Targeting Victim Y.G.

5 180. On or about March 30, 2009, defendant ORTEGA, in a
6 telephone conversation using coded language, told defendants
7 DARBINYAN and MNATSAKANYAN that ORTEGA had arrived at their
8 previously agreed upon meeting place to deliver "check runners,"
9 defendants Mares and Steven Wilson ("Wilson").

10 181. On or about March 30, 2009, defendant DARBINYAN, in a
11 telephone conversation using coded language, told defendant
12 Terzyan to drive defendants Mares and Wilson to different Bank of
13 America bank branches to deposit checks from victim Y.G.'s bank
14 account.

15 182. On or about March 30, 2009, defendant Terzyan drove
16 defendants Mares and Wilson to different Bank of America bank
17 branches in the Los Angeles, California area to cash fraudulent
18 checks from victim Y.G.'s bank account.

19 183. On or about March 30, 2009, defendants DARBINYAN and
20 Terzyan, in a telephone conversation using coded language,
21 discussed fraudulent checks drawn from victim Y.G.'s bank account
22 in the amounts of \$4,500 and \$5,000.

23 184. On or about March 30, 2009, defendant Wilson cashed
24 check number 304, made payable to "Steven A Wilson" in the amount
25 of \$4,500, drawn on Bank of America account number xxxxx-13899,
26 in the name of victim Y.G.

27 185. On or about March 30, 2009, defendant Mares cashed
28 check number 305, made payable to "Joseph Mares" in the amount of

1 \$5,300, drawn on Bank of America account number xxxxx-13899, in
2 the name of victim Y.G.

3 186. On or about March 30, 2009, defendant Mares cashed
4 check number 306, made payable to "Joseph Mares" in the amount of
5 \$5,000, drawn on Bank of America account number xxxxx-13899, in
6 the name of victim Y.G.

7 187. On or about March 30, 2009, defendant DARBINYAN, in a
8 telephone conversation using coded language, told defendant
9 Terzyan to direct defendant Wilson, who was waiting for bank
10 employees to verify whether he was authorized to cash another
11 check from victim Y.G.'s bank account, to immediately leave the
12 bank.

13 188. On or about March 30, 2009, defendant DARBINYAN, in a
14 telephone conversation using coded language, told defendant
15 ORTEGA to pick up defendants Mares and Wilson from defendant
16 Terzyan, and they discussed splitting the proceeds of the bank
17 fraud targeting victim Y.G.

18 Bank Fraud Targeting Victims F.D. and M.D.

19 189. On or about April 14, 2009, defendant DARBINYAN, in a
20 telephone conversation using coded language, told defendant Hagop
21 Yamalyan ("Yamalyan") to go to a 7-11 Store to pick up fraudulent
22 checks drawn from the bank account of victims F.D. and M.D. from
23 defendant TANGABEKYAN and to deliver the fraudulent checks to
24 defendant Terzyan.

25 190. On or about April 14, 2009, defendant TANGABEKYAN, in
26 a telephone conversation using coded language, told defendant
27 DARBINYAN that defendant Yamalyan had come over to pick up the
28

1 fraudulent checks associated with the bank account of victims
2 F.D. and M.D.

3 191. On or about April 14, 2009, defendant Terzyan, in a
4 telephone conversation using coded language, told defendant
5 DARBINYAN that he needed additional information to deposit a
6 fraudulent check drawn from the bank account of victims F.D. and
7 M.D. into a bank account under their control.

8 192. On or about April 14, 2009, defendant DARBINYAN, in a
9 telephone conversation using coded language, discussed with
10 defendant TANGABEKYAN providing defendant Terzyan with additional
11 information in order to deposit a fraudulent check drawn from the
12 bank account of victims F.D. and M.D.

13 193. On or about April 14, 2009, defendant Terzyan
14 deposited check number 2386, made payable to "RZ Diginet" in the
15 amount of \$28,357, drawn on Bank of America account number XXXXX-
16 14509, in the name of victims F.D. and M.D.

17 194. On or about April 14, 2009, defendant DARBINYAN, in a
18 telephone conversation using coded language, discussed with
19 defendant FNU LNU, aka "Musho" ("Musho"), that DARBINYAN had
20 fraudulent checks in the amounts of approximately \$28,300 and
21 \$72,000 in his possession.

22 195. On or about April 14, 2009, defendant FNU LNU, aka
23 "David Petrosov" ("Petrosov"), deposited check number 2387, made
24 payable to "David Petrosov" in the amount of \$74,350.09, drawn on
25 Bank of America account number XXXXX-14509, in the name of
26 victims F.D. and M.D.

27 196. On or about April 14, 2009, defendant DARBINYAN, in a
28 telephone conversation using coded language, told defendant L.

1 OGANDGANYAN to check on bank accounts under their control because
2 DARBINYAN had just received a call saying that a fraudulent check
3 from the bank account of victims F.D. and M.D. had been deposited
4 and DARBINYAN wanted to confirm the deposit.

5 Bank Fraud Targeting Victim L.R.

6 197. On or about April 15, 2009, defendant DARBINYAN, in a
7 telephone conversation using coded language, told defendant L.
8 OGANDGANYAN to impersonate an account holder and inquire into two
9 bank accounts under their control, and L. OGANDGANYAN agreed to
10 do so.

11 198. On or about April 15, 2009, defendant MNATSAKANYAN,
12 in a telephone conversation using coded language, told defendant
13 DARBINYAN that MNATSAKANYAN was sending small amounts of money
14 through a bank account to see if the money would go through
15 before sending larger amounts of money through the account.

16 199. On or about April 15, 2009, defendant DARBINYAN, in a
17 telephone conversation using coded language, told defendant L.
18 OGANDGANYAN that there would be small amounts of money coming
19 through a bank account, and L. OGANDGANYAN informed DARBINYAN
20 that those amounts had already arrived in the bank account.

21 200. On or about April 15, 2009, defendant DARBINYAN, in a
22 telephone conversation using coded language, discussed with
23 defendant ORTEGA prior fraudulent checks he had given to ORTEGA
24 and told ORTEGA to come by the following day to pick up and
25 deposit a fraudulent check.

26 201. On or about April 15, 2009, defendant DARBINYAN, in a
27 telephone conversation using coded language, discussed with
28

1 defendant MNATSAKANYAN depositing a fraudulent check drawn from
2 the bank account of victim L.R.

3 202. On or about April 16, 2009, defendant MARKOSIAN, in a
4 telephone conversation using coded language, discussed with
5 defendant DARBINYAN depositing a fraudulent check drawn from the
6 bank account of victim L.R.

7 203. On or about April 16, 2009, defendant MNATSAKANYAN,
8 in a telephone conversation using coded language, told defendant
9 ORTEGA that he would meet ORTEGA in Hollywood in two hours to
10 give him the fraudulent check.

11 204. On or about April 16, 2009, defendant DARBINYAN, in a
12 telephone conversation using coded language, asked defendant
13 MARKOSIAN the amount of the fraudulent check, and MARKOSIAN said
14 the check amount was \$135,200.

15 205. On or about April 17, 2009, a co-schemer deposited
16 check number 1459, made payable to "Ruzanna Hakobyan" in the
17 amount of \$135,200, drawn on Citibank account number xxxx-7159,
18 in the name of victim L.R.

19 206. On or about April 17, 2009, defendant DARBINYAN, in a
20 telephone conversation using coded language, discussed with
21 defendant MARKOSIAN when the fraudulent deposit would appear in a
22 bank account in the name of "Ruzanna Hakobyan," which was under
23 their control.

24 207. On or about April 17, 2009, defendant DARBINYAN, in a
25 telephone conversation using coded language, gave defendant L.
26 OGANDGANYAN the account number for the bank account in the name
27 of "Ruzanna Hakobyan," and DARBINYAN asked L. OGANDGANYAN to
28 monitor the account.

1 Bank Fraud and Access Device Fraud Targeting Customers of
2 99 Cents Only Stores

3 208. On or about July 6, 2009, defendant DARBINYAN, in a
4 telephone conversation using coded language, discussed with
5 defendant TARVERDYAN their plan to install and later remove
6 skimming devices inside credit/debit card terminals at 99 Cents
7 Only Stores to obtain and use bank debit card numbers of store
8 customers.

9 209. On or about July 6, 2009, defendants TARVERDYAN and
10 Andranik Bakhchadjian ("Bakhchadjian") entered a 99 Cents Only
11 Store in Whittier, California, to carry out the scheme to install
12 and remove skimming devices.

13 210. On or about July 13, 2009, defendant DARBINYAN, in a
14 telephone conversation using coded language, told defendants
15 PETROSIAN and Garen Chouldjian ("Chouldjian") that a co-schemer
16 was going to deliver victim account information the following day
17 or Friday.

18 211. On or about July 14, 2009, defendants TARVERDYAN and
19 Bakhchadjian went to three different 99 Cents Only Stores in
20 Riverside, California, to carry out the scheme to install and
21 remove skimming devices.

22 212. On or about July 16, 2009, defendant DARBINYAN, in a
23 telephone conversation using coded language, told defendant
24 PETROSIAN that DARBINYAN had fraudulently obtained debit card
25 account numbers and needed four "runners" for the following day
26 to withdraw money using the fraudulently obtained debit card
27 account numbers.

1 213. On or about July 16, 2009, defendant DARBINYAN, in a
2 telephone conversation using coded language, told defendant
3 Khachatur Arakelyan ("Arakelyan") that DARBINYAN needed four
4 "runners" the following day to withdraw money using the
5 fraudulently obtained debit card account numbers.

6 214. On or about July 16, 2009, defendant TARVERDYAN, in a
7 telephone conversation using coded language, asked defendant
8 DARBINYAN if DARBINYAN would be using "runners" to withdraw money
9 using fraudulently obtained debit card account numbers the
10 following day, and DARBINYAN said yes.

11 215. On or about July 16, 2009, defendant DARBINYAN, in a
12 telephone conversation using coded language, told defendant
13 Chouldjian that he needed four to five "runners" the following
14 day to withdraw money and that DARBINYAN had approximately 400
15 fraudulently obtained account numbers, and Chouldjian said that
16 the runners would withdraw the money from ATMs.

17 216. On or about July 17, 2009, defendant DARBINYAN, in a
18 telephone conversation using coded language, discussed with
19 defendant TARVERDYAN having "runners" withdraw money that day.

20 217. On or about July 17, 2009, defendant TARVERDYAN, in a
21 telephone conversation using coded language, told defendant
22 DARBINYAN that he had fraudulently obtained account numbers from
23 Wells Fargo Bank, and TARVERDYAN asked DARBINYAN if he was ready
24 to provide a second set of fraudulently obtained account numbers
25 to the "runners."

26 218. On or about July 17, 2009, defendants DARBINYAN and
27 Arakelyan, in a telephone conversation using coded language,
28

1 discussed the status of their efforts to withdraw money using the
2 fraudulently obtained account numbers.

3 219. On or about July 17, 2009, defendants DARBINYAN and
4 TARVERDYAN, in a telephone conversation using coded language,
5 discussed having "runners" withdraw funds before and after
6 midnight to avoid bank ATM withdrawal limits.

7 220. On or about July 17, 2009, defendant Vardan
8 Amirkhanyan ("Amirkhanyan") and other co-schemers known and
9 unknown to the Grand Jury withdrew money from several bank
10 accounts in the names of victims who had shopped at 99 Cents Only
11 Stores, using various ATMs within the Central District of
12 California.

13 221. On or about July 18, 2009, defendant DARBINYAN, in a
14 telephone conversation using coded language, discussed with
15 defendant Rafael Parsadanyan ("Parsadanyan") how the "runners"
16 had withdrawn funds before and after midnight to avoid bank ATM
17 withdrawal limits, and Parsadanyan said there were some
18 fraudulent debit cards left over.

19 222. On or about July 18, 2009, defendant PETROSIAN, in a
20 telephone conversation using coded language, told defendant
21 DARBINYAN that the "runners" were all there and working that day.

22 223. On or about July 18, 2009, defendant DARBINYAN, in a
23 telephone conversation using coded language, discussed with
24 defendant TARVERDYAN distributing proceeds from the fraudulent
25 bank withdrawals, and DARBINYAN told TARVERDYAN that he was going
26 to send defendant Parsadanyan to deliver approximately \$30,000 to
27 TARVERDYAN because DARBINYAN did not want to drive with that cash
28 in his possession.

1 224. On or about July 18, 2009, defendant Parsadanyan
2 possessed approximately \$30,000 in fraudulently obtained criminal
3 proceeds inside a plastic bag.

4 225. On or about July 18, 2009, defendant DARBINYAN, in a
5 telephone conversation using coded language, discussed with
6 defendant TARVERDYAN sending co-schemers to withdraw money using
7 fraudulent debit cards.

8 226. On or about July 18 and July 19, 2009, defendant
9 Amirkhanyan and other co-schemers known and unknown to the Grand
10 Jury withdrew money from several bank accounts in the names of
11 victims who had shopped at 99 Cents Only Stores, using various
12 ATMs within the Central District of California.

13 227. On or about July 20, 2009, defendant TARVERDYAN and
14 an unidentified co-schemer entered a 99 Cents Only Store in
15 Riverside, California, to carry out the scheme to install and
16 remove skimming devices.

17 228. On or about July 20, 2009, defendant PETROSIAN, in a
18 telephone conversation using coded language, discussed with
19 defendant DARBINYAN what percentage from the fraudulently
20 obtained money they were supposed to pay the "runners."

21 229. On or about July 21, 2009, defendant DARBINYAN, in a
22 telephone conversation using coded language, discussed installing
23 skimming devices at 99 Cents Only Stores with defendant
24 TARVERDYAN.

25 230. On or about July 21, 2009, defendant TARVERDYAN, in a
26 telephone conversation using coded language, told defendant
27 DARBINYAN that employees of 99 Cents Only Stores may have
28

1 discovered some of the skimming devices they had installed at
2 debit/credit card terminals.

3 231. On or about July 22, 2009, defendants Bakhchadjian
4 and Vartenie Ananian ("Ananian") entered a 99 Cents Only Store in
5 Riverside, California, to carry out the scheme to install and
6 remove skimming devices.

7 232. On or about August 8, 2009, defendant DARBINYAN, in a
8 telephone conversation using coded language, discussed with
9 defendant TARVERDYAN installing skimming devices that day.

10 233. On or about August 8, 2009, defendants Bakhchadjian
11 and Ananian, and other co-schemers known and unknown to the Grand
12 Jury, went to a 99 Cents Only Store in Ventura, California, to
13 carry out the scheme to install and remove skimming devices.

14 234. On or about August 8, 2009, co-schemers known and
15 unknown to the Grand Jury went to a 99 Cents Only Store in North
16 Hollywood, California, to carry out the scheme to install and
17 remove skimming devices.

18 235. On or about August 13, 2009, defendant DARBINYAN, in
19 a telephone conversation using coded language, told defendant
20 PEMBEJIAN that defendant Bakhchadjian would be installing
21 skimming devices soon.

22 236. On or about August 13 and August 14, 2009, co-
23 schemers known and unknown to the Grand Jury went to 99 Cents
24 Only Stores in San Diego, California, to carry out the scheme to
25 install and remove skimming devices.

26 237. On or about August 14, 2009, defendants Bakhchadjian
27 and Ananian went to 99 Cents Only Stores in Huntington Beach,
28

1 California, to carry out the scheme to install and remove
2 skimming devices.

3 238. On or about August 19, August 20, and August 21,
4 2009, unidentified co-schemers withdrew money from several bank
5 accounts in the names of victims who had shopped at 99 Cents Only
6 Stores, using various ATMs within the Central District of
7 California.

8 239. On or about August 24, 2009, defendants Bakhchadjian
9 and Ananian, and other co-schemers known and unknown to the Grand
10 Jury, attempted to retrieve a skimming device from a 99 Cents
11 Only Store in Huntington Beach, California.

12 240. On or about August 27, 2009, defendant DARBINYAN, in
13 a telephone conversation using coded language, told defendant
14 Parsadanyan that he was on his way to San Diego, California, to
15 meet with defendant ORTEGA regarding the scheme to install and
16 remove skimming devices.

17 241. On or about August 27, 2009, defendants ORTEGA and
18 Catrina Balderrama ("Balderrama"), and other co-schemers known
19 and unknown to the Grand Jury, went to at least two 99 Cents Only
20 Stores in San Diego, California, to carry out the scheme to
21 install and remove skimming devices.

22 242. On or about August 28, 2009, defendant DARBINYAN, in
23 a telephone conversation using coded language, asked defendant
24 TARVERDYAN if TARVERDYAN could prepare counterfeit and
25 unauthorized access devices, and TARVERDYAN agreed to do so.

26 243. On or about September 16, 2009, defendant DARBINYAN,
27 in a telephone conversation using coded language, asked defendant
28 Simon Antonyan ("Antonyan") how many unauthorized access devices

1 they were supposed to give to defendant ORTEGA for his work in
2 the scheme to install and remove skimming devices at 99 Cents
3 Only Stores, and Antonyan said they were supposed to give ORTEGA
4 approximately 500 unauthorized access devices.

5 Bank Fraud Targeting Victim K.K.

6 244. On or about July 27, 2010, defendant SHAROPETROSIAN,
7 in a telephone conversation using coded language, discussed with
8 an unindicted co-schemer committing bank fraud on an account
9 worth over \$700,000, and SHAROPETROSIAN said he has been working
10 with an incarcerated co-schemer to perpetrate bank fraud on
11 various victim bank accounts.

12 245. On or about July 27, 2009, defendant SHAROPETROSIAN,
13 in a telephone conversation using coded language, told an
14 unindicted co-schemer that SHAROPETROSIAN had obtained bank
15 account information for victim K.K., and SHAROPETROSIAN provided
16 the co-schemer with victim K.K.'s social security number and told
17 the co-schemer to get him victim K.K.'s address.

18 246. On or about August 13, 2009, an incarcerated co-
19 schemer working with defendant SHAROPETROSIAN called a customer
20 service representative for JP Morgan Chase Bank, pretended to be
21 victim K.K., and obtained information about victim K.K.'s bank
22 account, including the balance and recent check activity
23 associated with the account.

24 247. On or about August 13, 2009, two unindicted co-
25 schemers working with defendant SHAROPETROSIAN, in a telephone
26 conversation using coded language, discussed having checks
27 delivered to victim K.K.'s address so that they could intercept
28 the checks and take money from victim K.K.'s bank account.

1 Bank Fraud Targeting Victim M.C.

2 248. On or about July 28, 2009, an unindicted co-schemer,
3 in a telephone conversation using coded language, provided
4 defendant SHAROPETROSIAN with victim M.C.'s personal identifying
5 information, including victim M.C.'s address, date of birth, and
6 social security number, and gave SHAROPETROSIAN victim M.C.'s
7 Bank of America account information.

8 249. On or about July 28, 2009, defendant SHAROPETROSIAN,
9 in a telephone conversation using coded language, told an
10 unindicted co-schemer that SHAROPETROSIAN had checked on victim
11 M.C.'s bank accounts and that one of victim M.C.'s bank accounts
12 contained approximately \$108,000.

13 250. On or about July 29, 2009, defendant SHAROPETROSIAN,
14 in a telephone conversation using coded language, told an
15 unindicted co-schemer that other co-schemers would steal victims'
16 checks from their houses.

17 251. On or about August 3, 2009, defendant SHAROPETROSIAN,
18 in a telephone conversation using coded language, told defendant
19 MARKOSIAN that SHAROPETROSIAN would have co-schemers provide
20 MARKOSIAN with fraudulent checks for victim M.C.'s bank account,
21 and MARKOSIAN discussed depositing the fraudulent checks the
22 following day.

23 252. On or about August 3, 2009, defendant SHAROPETROSIAN,
24 in a telephone conversation using coded language, told an
25 unindicted co-schemer to tell another unindicted co-schemer
26 working at Citibank to bring them victim bank accounts.

27 253. On or about August 13, 2009, an incarcerated co-
28 schemer working with defendant SHAROPETROSIAN called Bank of

1 America customer service and obtained information regarding
2 victim M.C.'s account balances and recent check activity.

3 Bank Fraud Targeting Victim J.L.

4 254. On or about August 6, 2009, an unindicted co-schemer,
5 in a telephone conversation using coded language, told defendant
6 SHAROPETROSIAN that she was working on forging the signature on a
7 fraudulent check drawn from the bank account of victim J.L., and
8 SHAROPETROSIAN said defendant MARKOSIAN would come to pick up the
9 fraudulent check in about an hour.

10 255. On or about August 6, 2009, defendant MARKOSIAN, in a
11 telephone conversation using coded language, told defendant
12 SHAROPETROSIAN that he was on his way to pick up the fraudulent
13 check drawn from the bank account of victim J.L. and that the
14 fraudulent check would be deposited that day.

15 256. On or about August 6, 2009, an unindicted co-schemer,
16 in a telephone conversation using coded language, told defendant
17 SHAROPETROSIAN that she was able to forge the signature on the
18 fraudulent check drawn from the bank account of victim J.L.

19 257. On or about August 6, 2009, defendant SHAROPETROSIAN,
20 in a telephone conversation using coded language, told an
21 unindicted co-schemer to write out approximately \$44,000 for the
22 fraudulent check drawn from the bank account of victim J.L., and
23 SHAROPETROSIAN discussed forging other fraudulent checks.

24 258. On or about August 6, 2009, defendant MARKOSIAN, in a
25 telephone conversation using coded language, told defendant
26 SHAROPETROSIAN that the fraudulent check drawn from the bank
27 account of victim J.L. was for \$44,000, and MARKOSIAN discussed
28 cashing other fraudulent checks.

1 259. On or about August 6, 2009, two unindicted co-
2 schemers possessed check number 2117, made payable to "Gagik
3 Karapetyan" in the amount of \$44,730.17, drawn from Citibank
4 account number xxxx-xxx-3182, in the name of victim J.L., that
5 had been provided to them by defendants SHAROPETROSIAN and
6 MARKOSIAN and another unindicted co-schemer.

7 260. On or about August 6, 2009, defendant MARKOSIAN, in a
8 telephone conversation using coded language, told defendant
9 SHAROPETROSIAN that the co-schemers who were going to cash the
10 fraudulent check drawn from the bank account of victim J.L. had
11 been stopped by police officers before depositing the fraudulent
12 check.

13 261. On or about August 7, 2009, defendant MARKOSIAN, in a
14 telephone conversation using coded language, told defendant
15 SHAROPETROSIAN that the co-schemers who were supposed to deposit
16 the fraudulent check drawn from the bank account of victim J.L.
17 had put the fraudulent check in the glove compartment, but that
18 police officers had found the fraudulent check.

19 Bank Fraud Targeting Victim N.A.

20 262. On or about August 19, 2009, defendant
21 SHAROPETROSIAN, in a telephone conversation using coded language,
22 discussed with defendant MARKOSIAN a bank account belonging to
23 victim N.A., and MARKOSIAN said they should try to withdraw
24 approximately \$45,000 from that account.

25 263. On or about August 20, 2009, an unindicted co-
26 schemer, in a telephone conversation using coded language, gave
27 defendant SHAROPETROSIAN numerous bank account numbers for bank
28

1 accounts belonging to victim N.A. and said the bank accounts
2 contained over \$200,000.

3 264. On or about August 26, 2009, an unindicted co-
4 schemer, in a telephone conversation using coded language,
5 provided defendant SHAROPETROSIAN with victim N.A.'s bank account
6 numbers, address, social security number, mother's maiden name,
7 and other personal identifying information, and SHAROPETROSIAN
8 said he only needed checks for victim N.A.'s bank accounts to
9 perpetrate the bank fraud.

10 265. On or about August 27, 2009, an incarcerated co-
11 schemer working with defendant SHAROPETROSIAN, in a telephone
12 conversation using coded language, discussed with another
13 unindicted co-schemer ordering checks associated with victim
14 N.A.'s bank accounts.

15 266. On or about August 30, 2009, defendant
16 SHAROPETROSIAN, in a telephone conversation using coded language,
17 provided an unindicted co-schemer with victim N.A.'s personal
18 identifying information, and SHAROPETROSIAN instructed the co-
19 schemer to call Bank of America customer service to impersonate
20 victim N.A. and obtain account balance information for victim
21 N.A.'s account.

22 Bank Fraud Targeting Victims K.W.K. and H.K.

23 267. On or about August 20, 2009, defendant
24 SHAROPETROSIAN, in a telephone conversation using coded language,
25 obtained bank account information and personal identifying
26 information, including names, an address, and social security
27 numbers, for victims K.W.K. and H.K.

1 268. On or about August 20, 2009, defendant
2 SHAROPETROSIAN, in a telephone conversation using coded language,
3 told defendant DARBINYAN that SHAROPETROSIAN wanted information
4 concerning bank accounts with high-dollar balances, like in the
5 \$400,000 to \$500,000 range, and that SHAROPETROSIAN had set up a
6 good bank fraud scheme with another prison inmate.

7 269. On or about August 20, 2009, defendant DARBINYAN, in
8 a telephone conversation using coded language, told defendant
9 SHAROPETROSIAN that DARBINYAN had account information for a Wells
10 Fargo Bank victim with approximately \$200,000 in his account, and
11 SHAROPETROSIAN said he wanted victim bank accounts from
12 Washington Bank, Citibank, and Bank of America, and that he was
13 working with people who could obtain such victims' personal
14 information.

15 Bank Fraud and Access Device Fraud Involving
16 Defendants BILEZIKCHYAN, K. YERKANYAN, and ALOYAN

17 270. On or about November 15, 2009, defendant K.
18 YERKANYAN, in a telephone conversation using coded language,
19 discussed with an unindicted co-schemer receiving via the U.S.
20 mail information regarding a bank account opened in the name of a
21 bank fraud victim using the victim's personal identifying
22 information, and K. YERKANYAN discussed obtaining a post office
23 box to receive the bank account information.

24 271. On or about November 16, 2009, defendant K.
25 YERKANYAN, in a telephone conversation using coded language,
26 discussed with an unindicted co-schemer obtaining personal
27 identifying information for bank fraud victims.

28

1 272. On or about November 16, 2009, defendant
2 BILEZIKCHYAN, in a telephone conversation using coded language,
3 discussed with an unindicted co-schemer receiving via U.S. mail
4 information regarding a bank account opened in the name of a
5 victim using the victim's personal identifying information, and
6 they also discussed the credit score of a bank fraud victim.

7 273. On or about November 21, 2009, defendant
8 BILEZIKCHYAN, in a telephone conversation using coded language,
9 discussed with an unindicted co-schemer their possession of
10 personal identifying information for a bank fraud victim who was
11 the mother of a police officer, and that they had obtained a post
12 office box to receive mail regarding fraudulently opened bank
13 accounts.

14 274. On or about November 23, 2009, defendant
15 BILEZIKCHYAN, in a telephone conversation using coded language,
16 discussed with an unindicted co-schemer providing the co-schemer
17 with personal identifying information for bank fraud victims.

18 275. On or about November 25, 2009, defendant
19 BILEZIKCHYAN, in a telephone conversation using coded language,
20 discussed with an unindicted co-schemer obtaining a fake
21 identification document to aid in fraudulently opening bank
22 accounts.

23 276. On or about January 8, 2010, an unindicted co-
24 schemer, in a telephone conversation using coded language, told
25 defendant BILEZIKCHYAN that the co-schemer wanted to fraudulently
26 cash a cashier's check worth \$10,000, and BILEZIKCHYAN told the
27 co-schemer to give the cash to defendant K. YERKANYAN.

28

1 277. On or about January 8, 2010, defendant K. YERKANYAN,
2 in a telephone conversation using coded language, spoke with
3 defendant Edgar Yerkanyan ("E. Yerkanyan") about fraudulently
4 cashing a cashier's check worth \$10,000.

5 278. On or about March 10, 2010, defendants BILEZIKCHYAN
6 and ALOYAN met with an unindicted co-schemer in Murrieta,
7 California, to discuss committing bank fraud on high-value bank
8 accounts, including a bank account in the name of victim S.T.

9 279. On or about March 10, 2010, defendant ALOYAN provided
10 an unindicted co-schemer with Bank of America account information
11 for a bank account in the name of victim S.T. containing
12 approximately \$190,371.

13 280. On or about March 10, 2010, defendant ALOYAN obtained
14 credit reports for victim S.T. and provided the credit reports to
15 an unindicted co-schemer.

16 Additional Bank Fraud Activity

17 281. On or about June 21, 2009, defendant TANGABEKYAN
18 called the JP Morgan Chase Bank automated customer service
19 number, entered account information for the bank account of
20 victim R.M. to obtain the current balance for the account and
21 recent account activity, and was informed that the balance for
22 victim R.M.'s account was \$369,626.37.

23 282. On or about June 22, 2009, defendant TANGABEKYAN
24 called the JP Morgan Chase Bank automated customer service
25 number, entered account information for the bank account of
26 victims J.D. and M.D. to obtain the current balance for the
27 account and recent account activity, and was informed that the
28

1 current balance for victims J.D.'s and M.D.'s account was
2 \$328,362.86.

3 283. On or about June 22, 2009, defendant TANGABEKYAN
4 called the JP Morgan Chase Bank automated customer service
5 number, entered account information for the bank account of
6 victim R.T. to obtain the current balance for the account and
7 recent account activity, and was informed that the current
8 balance for victim R.T.'s account was \$217,301.69.

9 284. On or about June 23, 2009, defendant TANGABEKYAN
10 called the JP Morgan Chase Bank customer service number, entered
11 account information for the bank account of victim R.M., spoke to
12 a customer service representative, and obtained balances for
13 various bank accounts of victim R.M.

14 285. On or about July 8, 2009, defendant TANGABEKYAN, in a
15 telephone conversation using coded language, told defendant
16 DARBINYAN that TANGABEKYAN would bring fraudulent checks for two
17 bank accounts to DARBINYAN that day, and that the fraudulent
18 checks for another bank account would be ready the following day.

19 286. On or about July 13, 2009, defendant DARBINYAN, in a
20 telephone conversation using coded language, told defendant
21 TANGABEKYAN that a fraudulent check had cleared, and DARBINYAN
22 asked TANGABEKYAN to write another fraudulent check for
23 approximately \$75,000; TANGABEKYAN then responded that he would
24 do so with great pleasure.

25 287. On or about July 16, 2009, defendant DARBINYAN, in a
26 telephone conversation using coded language, discussed with
27 defendant TANGABEKYAN fraudulent checks prepared by TANGABEKYAN.
28

1 288. On or about July 23, 2009, defendants SHAROPETROSIAN
2 and AIRAPETIAN, in a telephone conversation using coded language,
3 discussed finding "runners" to fraudulently cash and deposit
4 checks.

5 289. On or about July 27, 2009, defendant SHAROPETROSIAN,
6 in a telephone conversation using coded language, asked defendant
7 AIRAPETIAN to deliver checks to an unindicted co-schemer so that
8 she could forge the signatures.

9 290. On or about July 29, 2009, defendant SHAROPETROSIAN,
10 in a telephone conversation using coded language, discussed with
11 defendant AIRAPETIAN committing bank fraud and giving defendant
12 MARKOSIAN twenty-five percent of the proceeds for cashing a
13 fraudulent check.

14 291. On or about August 5, 2009, defendant DARBINYAN, in a
15 telephone conversation using coded language, discussed with
16 defendant TANGABEKYAN preparing fraudulent checks for victim
17 accounts at Bank of America, Wells Fargo Bank, and Citibank.

18 292. On or about August 28, 2009, defendant
19 SHAROPETROSIAN, in a telephone conversation using coded language,
20 discussed with an unindicted co-schemer writing fraudulent checks
21 for victim bank accounts.

22 293. On or about September 1, 2009, defendant
23 SHAROPETROSIAN, in a telephone conversation using coded language,
24 discussed with defendant AIRAPETIAN recruiting "runners" to
25 withdraw money from banks, including Bank of America, using
26 fraudulently obtained access devices.

27 294. On or about September 1, 2009, defendant AIRAPETIAN,
28 in a telephone conversation using coded language, told defendant

1 SHAROPETROSIAN that, in general, the maximum amount they would be
2 able to withdraw from Bank of America bank accounts they had
3 fraudulently gained access to would be \$500 per day.

4 295. On or about September 1, 2009, defendant AIRAPETIAN,
5 in a telephone conversation using coded language, told defendant
6 SHAROPETROSIAN that he had contacted an employee of Citibank who
7 would be able to provide them with bank customer information, and
8 SHAROPETROSIAN and AIRAPETIAN discussed obtaining bank
9 information for customers who were older in age and who had high-
10 value accounts.

11 296. On or about September 9, 2009, defendant TANGABEKYAN,
12 in a telephone conversation using coded language, discussed with
13 defendant DARBINYAN fraudulent checks and bank account
14 information for victim bank accounts from Citibank and Wells
15 Fargo Bank.

16 297. On or about September 11, 2009, defendant AIRAPETIAN,
17 in a telephone conversation using coded language, discussed with
18 defendant SHAROPETROSIAN distributing unauthorized access devices
19 to "runners" in order to fraudulently withdraw money from bank
20 accounts.

21 298. On or about September 30, 2009, defendant TARVERDYAN,
22 in a telephone conversation using coded language, told defendant
23 DARBINYAN that TARVERDYAN would write out some fraudulent checks
24 and give them to DARBINYAN, and DARBINYAN said they cheated
25 someone out of \$300,000 that day.

26 299. On or about October 10, 2009, defendant K. YERKANYAN,
27 in a telephone conversation using coded language, asked defendant
28

1 DARBINYAN for fraudulent checks because K. YERKANYAN had victim
2 bank accounts at Wells Fargo Bank and Citibank that he could use.

3 300. On or about October 13, 2009, defendant
4 SHAROPETROSIAN, in a telephone conversation using coded language,
5 asked defendant DARBINYAN if he had victim bank account
6 information, and DARBINYAN said he had available a victim bank
7 account from Wells Fargo Bank worth about \$200,000.

8 301. On or about December 1, 2009, defendant TANGABEKYAN,
9 in a telephone conversation using coded language, asked defendant
10 DARBINYAN to look up information regarding a fraudulent check
11 worth about \$150,000 that TANGABEKYAN had written.

12 Identity Theft and Access Device Fraud Using the Saticoy
13 Location

14 302. On or about January 16, 2010, defendant H. KARAYAN,
15 in a telephone conversation using coded language, discussed with
16 defendant TARVERDYAN the need to get their fraudulent business
17 going so that they could make some money.

18 303. On or about January 21, 2010, defendant H. KARAYAN,
19 in a telephone conversation using coded language, discussed with
20 defendant TARVERDYAN that they had six individuals ready to work
21 on their financial fraud business and discussed the need to rent
22 office space.

23 304. On or about January 22, 2010, defendant H. KARAYAN,
24 in a telephone conversation using coded language, discussed with
25 defendant A. KARAYAN that H. KARAYAN and defendant Gagik
26 Zhamkochyan ("Zhamkochyan") had found space for their financial
27 fraud business on Saticoy.

28

1 305. On or about January 25, 2010, defendant Arsen
2 Ayranjian ("Ayranjian") signed a two-year lease for space at
3 13847 Saticoy Street in North Hollywood, California ("Saticoy"),
4 stating that the property would be used only for a food pickling
5 company and related storage.

6 306. On or about January 25, 2010, defendant A. KARAYAN
7 issued a cashier's check for \$7,750 to DRZ Partners to lease
8 office space at Saticoy.

9 307. On or about January 25, 2010, defendant H. KARAYAN,
10 in a telephone conversation using coded language, discussed with
11 defendant Zhamkochyan using the space at Saticoy for their
12 financial fraud business, and H. KARAYAN instructed Zhamkochyan
13 to contact defendants A. KARAYAN and Karapet Joey Karamusyan
14 ("Karamusyan") regarding activities at Saticoy.

15 308. On or about January 25, 2010, defendant H. KARAYAN,
16 in a telephone conversation using coded language, discussed with
17 defendant A. KARAYAN the lease for office space at Saticoy.

18 309. On or about January 25, 2010, defendant H. KARAYAN,
19 in a telephone conversation using coded language, discussed with
20 defendant A. KARAYAN moving furniture into the office space at
21 Saticoy, and H. KARAYAN told A. KARAYAN to instruct defendants
22 Karamusyan and Ayranjian to obtain insurance for the financial
23 fraud business at Saticoy.

24 310. On or about January 25, 2010, defendant H. KARAYAN,
25 in a telephone conversation using coded language, discussed with
26 defendant Karamusyan individuals whom they could pay in exchange
27 for use of their identities in fraudulent activity.

28

1 311. On or about January 26, 2010, defendant H. KARAYAN,
2 in a telephone conversation using coded language, discussed with
3 defendant Zhamkochyan individuals whom they could pay in exchange
4 for use of their identities in fraudulent activity.

5 312. On or about January 26, 2010, defendant H. KARAYAN,
6 in a telephone conversation using coded language, discussed with
7 defendant TARVERDYAN moving into the office space at Saticoy, and
8 H. KARAYAN said he would contact defendant Karamusyan.

9 313. On or about January 27, 2010, defendant H. KARAYAN,
10 in a telephone conversation using coded language, discussed with
11 defendant Zhamkochyan moving into the office space at Saticoy and
12 that defendants Karamusyan and Haroutioun Arthur Melkonian
13 ("Melkonian") would also be there.

14 314. On or about January 27, 2010, defendants H. KARAYAN,
15 A. KARAYAN, TARVERDYAN, Zhamkochyan, Karamusyan, and Melkonian
16 went to the office at Saticoy.

17 315. On or about January 28, 2010, defendants H. KARAYAN
18 and Zhamkochyan went to the office at Saticoy.

19 316. On or about February 1, 2010, defendant TARVERDYAN,
20 in a telephone conversation using coded language, asked defendant
21 H. KARAYAN when they should go to the office at Saticoy and make
22 some money.

23 317. On or about February 3, 2010, defendant H. KARAYAN,
24 in a telephone conversation using coded language, told defendant
25 Zhamkochyan that defendants A. KARAYAN, TARVERDYAN, and Melkonian
26 were at Saticoy.

27 318. On or about February 3, 2010, defendant H. KARAYAN
28 went to the office at Saticoy.

1 319. On or about February 10, 2010, defendants H. KARAYAN,
2 A. KARAYAN, TARVERDYAN, Zhamkochyan, Karamusyan, and Melkonian
3 possessed pre-paid telephone cards, marked with their names, for
4 their use in connection with the financial fraud business at
5 Saticoy.

6 320. On or about February 10, 2010, defendants H. KARAYAN,
7 A. KARAYAN, TARVERDYAN, Zhamkochyan, Karamusyan, and Melkonian
8 possessed rubber fingerprint covers to prevent their fingerprints
9 from appearing on the documents and items inside Saticoy.

10 321. On or about February 10, 2010, defendants H. KARAYAN,
11 A. KARAYAN, TARVERDYAN, Zhamkochyan, Karamusyan, and Melkonian
12 possessed a "reader-writer" device used to re-encode the magnetic
13 strips on access devices, such as credit and debit cards, and
14 possessed "skimming devices" used to collect means of
15 identification, including account numbers, from gas station
16 pumps.

17 322. On or about February 10, 2010, defendant H. KARAYAN
18 made false and misleading statements and representations to law
19 enforcement and claimed that he had never been to Saticoy, did
20 not lease or own office space at Saticoy, and did not operate a
21 financial fraud business at Saticoy.

22 323. On or about August 24, 2010, defendant Ayranjian made
23 false and misleading statements and representations to law
24 enforcement about his involvement with the operation of Saticoy
25 and told law enforcement that when he signed the lease for the
26 office space at Saticoy, he intended for that space to be used as
27 an import-export business for canned foods.

1 Additional Acts of Identity Theft and Access Device Fraud

2 324. On or about October 21, 2004, defendant DARBINYAN
3 withdrew money from Bank of America bank accounts belonging to
4 others, and possessed approximately \$24,527 in proceeds from bank
5 fraud.

6 325. On or about October 21, 2004, defendant DARBINYAN
7 possessed fifteen or more counterfeit and unauthorized access
8 devices, that is, at least 150 debit card account numbers in the
9 names of other people.

10 326. On or about December 8, 2004, defendants H. TOROSYAN
11 and SEROBYAN, and others, possessed a skimming device and an
12 encoding device, that is, devices that can be used to create
13 counterfeit or unauthorized access devices.

14 327. On or about December 8, 2004, defendants H. TOROSYAN
15 and SEROBYAN, and others, used and possessed fifteen or more
16 counterfeit and unauthorized access devices.

17 328. On or about August 24, 2007, defendant TOPADZHIKYAN
18 possessed the means of identification of another person,
19 specifically, the name, date of birth, social security number,
20 and bank account numbers belonging to victim P.S., without the
21 consent, knowledge, or authorization of victim P.S.

22 329. On or about July 1, 2009, defendant DARBINYAN, in a
23 telephone conversation using coded language, asked defendant
24 MNATSAKANYAN to prepare a fraudulent access device for DARBINYAN,
25 and MNATSAKANYAN said he could do so.

26 330. On or about August 17, 2009, defendant DARBINYAN, in
27 a telephone conversation using coded language, told defendant
28 BILEZIKCHYAN that DARBINYAN had tried five fraudulent access

1 devices at a 7-11 Store, but they were defective so DARBINYAN was
2 going to get more, and BILEZIKCHYAN said he needed some
3 fraudulent access devices too.

4 331. On or about November 6, 2009, defendants H. TOROSYAN
5 and TOPADZHIKYAN, and others unknown to the Grand Jury, went to a
6 gas station in La Verne, California, to install a skimming
7 device.

8 332. On or about November 6, 2009, defendants H. TOROSYAN,
9 SEROBYAN, and TOPADZHIKYAN, and others unknown to the Grand Jury,
10 installed, controlled, and possessed a skimming device, and
11 possessed a gas station master key that could be used to install
12 a skimming device.

13 333. On or about November 6, 2009, defendants H. TOROSYAN,
14 SEROBYAN, and TOPADZHIKYAN, and others unknown to the Grand Jury,
15 possessed credit reports for victims R.P. and D.L.

16 334. On or about May 25, 2010, defendant TOPADZHIKYAN
17 possessed counterfeit access devices and the means of
18 identification of other persons for the purpose of committing
19 identity theft and access device fraud.

20 335. On or about May 25, 2010, defendant TOPADZHIKYAN
21 possessed device-making equipment, such as a reader-writer
22 encoder, an embosser, and a tipping machine, for the purpose of
23 creating counterfeit access devices.

24 336. On or about September 3, 2010, defendant ALOYAN
25 possessed approximately 47 access devices, including 23 credit
26 card numbers and 24 bank account numbers, in the names of other
27 people, without their consent, knowledge, or authorization.

28

1 337. On or about September 3, 2010, defendant ALOYAN
2 possessed five or more identification documents and false
3 identification documents, and knowingly possessed means of
4 identification for other people, without their consent,
5 knowledge, or authorization.

6 338. On or about September 3, 2010, defendant ALOYAN
7 possessed checks and other bank account information in the names
8 of other people, without their consent, knowledge, or
9 authorization.

10 Conspiracy to Possess with Intent to Distribute Stolen
11 Marijuana

12 339. On or about August 5, 2009, defendant BILEZIKCHYAN,
13 in a telephone conversation using coded language, discussed with
14 defendant S. Torosyan the fact that defendant Arnold Moradians
15 ("Moradians") sells large quantities of marijuana.

16 340. On or about August 6, 2009, defendant BILEZIKCHYAN,
17 in a telephone conversation using coded language, spoke with
18 defendant Adam Davoodian ("Davoodian") and asked Davoodian if he
19 had ever purchased marijuana from defendant Moradians, and
20 Davoodian stated that he had just purchased \$20,000 worth of
21 marijuana from Moradians.

22 341. On or about August 7, 2009, defendant BILEZIKCHYAN,
23 in a telephone conversation using coded language, told defendant
24 Moradians that BILEZIKCHYAN would bring some people to help
25 Moradians package marijuana.

26 342. On or about August 8, 2009, defendant BILEZIKCHYAN,
27 in a telephone conversation using coded language, told defendant
28 Artur Gabrelyan ("Gabrelyan") that defendant Moradians had two

1 million dollars worth of marijuana and needed help vacuuming and
2 packaging the marijuana, and Gabrelyan agreed to meet with
3 BILEZIKCHYAN and help out.

4 343. On or about August 8, 2009, defendant BILEZIKCHYAN,
5 in a telephone conversation using coded language, told defendant
6 Moradians that he had sent some guys to help Moradians package
7 marijuana.

8 344. On or about August 9, 2009, defendant BILEZIKCHYAN,
9 in a telephone conversation using coded language, told defendant
10 O. TEROGANESYAN that BILEZIKCHYAN and defendants K. YERKANYAN and
11 S. Torosyan wanted to bring narcotics to O. TEROGANESYAN's auto
12 body shop, MR Auto Body Collision, the next day in order to
13 package the narcotics, and O. TEROGANESYAN agreed.

14 345. On or about August 10, 2009, defendant BILEZIKCHYAN,
15 in a telephone conversation using coded language, told defendant
16 O. TEROGANESYAN that they needed a compressor hose to package the
17 marijuana and asked O. TEROGANESYAN to cover the windows in his
18 office so that they could package the marijuana there, and O.
19 TEROGANESYAN said they could package the marijuana after the auto
20 body shop workers left for the day.

21 346. On or about August 11, 2009, defendant BILEZIKCHYAN,
22 in a telephone conversation using coded language, discussed with
23 defendant O. TEROGANESYAN a plan to steal the marijuana that they
24 had helped to package for defendant Moradians, and O.
25 TEROGANESYAN agreed to make a copy of the keys for the U-Haul
26 truck that contained the packaged marijuana so that they could
27 steal the marijuana.

28

1 347. On or about August 11, 2009, defendant BILEZIKCHYAN,
2 in a telephone conversation using coded language, spoke with
3 defendant Sarkis Avedisian ("Avedisian") and asked Avedisian to
4 hide marijuana on his property, and Avedisian agreed to do so.

5 348. On or about August 11, 2009, defendant BILEZIKCHYAN,
6 in a telephone conversation using coded language, told defendant
7 O. TEROGANESYAN that defendant K. YERKANYAN was on his way to
8 assist O. TEROGANESYAN in stealing the U-Haul truck containing
9 the packaged marijuana, and BILEZIKCHYAN told O. TEROGANESYAN to
10 leave the U-Haul truck abandoned somewhere after they removed the
11 marijuana; and the U-Haul truck was eventually left parked on
12 Clifton Place in Glendale, California.

13 349. On or about August 11, 2009, defendant BILEZIKCHYAN,
14 in a telephone conversation using coded language, told defendant
15 Moradians that other individuals had stolen the packaged
16 marijuana from the U-Haul truck, and BILEZIKCHYAN claimed he had
17 nothing to do with the theft of the marijuana.

18 350. On or about August 11, 2009, defendants BILEZIKCHYAN,
19 K. YERKANYAN, and Davoodian met with defendant Moradians and
20 pretended that K. YERKANYAN and Davoodian were rival claimants to
21 BILEZIKCHYAN and Moradians for the stolen marijuana.

22 351. On or about August 11, 2009, defendant BILEZIKCHYAN,
23 in a telephone conversation using coded language, told defendant
24 O. TEROGANESYAN that BILEZIKCHYAN was in possession of the
25 marijuana they had stolen from defendant Moradians.

26 352. On or about August 11, 2009, defendant BILEZIKCHYAN,
27 in a telephone conversation using coded language, told defendant
28 Gabrelyan that BILEZIKCHYAN was in possession of approximately

1 207 pounds of marijuana, and that the marijuana was worth
2 \$450,000.

3 353. On or about August 15, 2009, defendant BILEZIKCHYAN,
4 in a telephone conversation using coded language, told an
5 unindicted co-conspirator that the marijuana BILEZIKCHYAN and his
6 co-conspirators had stolen from the U-Haul truck was worth
7 \$450,000, that BILEZIKCHYAN and his co-conspirators had divided
8 up the money, and that BILEZIKCHYAN's share was \$150,000.

9 Conspiracy to Manufacture and Possess with Intent to
10 Distribute Marijuana

11 354. In or around January 2010, defendant Ayranyan took
12 care of marijuana plants being grown at the marijuana facilities
13 operated by defendant H. KARAYAN and others.

14 355. On or about January 14, 2010, defendant H. KARAYAN,
15 in a telephone conversation using coded language, discussed with
16 defendant TARVERDYAN starting a marijuana grow consisting of
17 approximately 500 plants and finding workers to help cultivate
18 the marijuana plants.

19 356. On or about January 15, 2010, defendant H. KARAYAN,
20 in a telephone conversation using coded language, discussed with
21 defendant A. KARAYAN purchasing plant fertilizer for growing
22 marijuana plants.

23 357. On or about January 16, 2010, defendant H. KARAYAN,
24 in a telephone conversation using coded language, discussed with
25 defendant Zhirayr Karayan ("Z. Karayan") drying, packaging, and
26 labeling marijuana.

27 358. On or about January 16, 2010, defendant H. KARAYAN,
28 in a telephone conversation using coded language, discussed with

1 defendant GAMBARYAN growing marijuana, and H. KARAYAN said he had
2 moved marijuana plants into his house.

3 359. On or about January 17, 2010, defendant H. KARAYAN,
4 in a telephone conversation using coded language, told defendant
5 Z. Karayan that Z. Karayan should instruct defendant Ayranjian to
6 go to defendant A. KARAYAN's marijuana facility, water the
7 plants, and make sure to vacuum carefully at the location.

8 360. On or about January 21, 2010, defendant H. KARAYAN,
9 in a telephone conversation using coded language, discussed with
10 defendant GAMBARYAN looking for another marijuana grow location.

11 361. On or about January 22, 2010, defendant H. KARAYAN,
12 in a telephone conversation using coded language, discussed with
13 defendant Z. Karayan obtaining larger locations to grow
14 marijuana, including one location that already had 150 marijuana
15 plants inside of it.

16 362. On January 22, 2010, defendant H. KARAYAN, in a
17 telephone conversation using coded language, discussed with
18 defendant A. KARAYAN a person who had a warehouse of marijuana
19 plants for sale for \$25,000, and H. KARAYAN said it was good
20 deal.

21 363. On or about January 25, 2010, defendant H. KARAYAN,
22 in a telephone conversation using coded language, discussed with
23 defendant A. KARAYAN checking on the condition of their marijuana
24 plants.

25 364. On or about January 26, 2010, defendant H. KARAYAN,
26 in a telephone conversation using coded language, discussed with
27 defendants A. KARAYAN and Z. Karayan growing marijuana plants.

1 365. On or about January 28, 2010, defendant K. YERKANYAN,
2 in a telephone conversation using coded language, discussed with
3 defendant H. KARAYAN one of H. KARAYAN's marijuana grows, and
4 H. KARAYAN said he would start cutting the marijuana from the
5 marijuana grow that upcoming Saturday or Sunday.

6 366. On or about February 6, 2010, defendant H. KARAYAN,
7 in a telephone conversation using coded language, told defendant
8 K. YERKANYAN that H. KARAYAN was at work setting up a marijuana
9 grow.

10 367. On or about February 8, 2010, defendant H. KARAYAN,
11 in a telephone conversation using coded language, told an
12 unindicted co-conspirator that H. KARAYAN had high quality
13 marijuana available at \$1,100 to \$1,200 dollars for 12 ounces.

14 368. On or about February 8, 2010, defendant H. KARAYAN,
15 in a telephone conversation using coded language, told an
16 unindicted co-conspirator that H. KARAYAN would need 200 clone
17 marijuana plants for one of his marijuana grow locations, and 200
18 marijuana clone plants for another marijuana grow location.

19 369. On or about February 8, 2010, defendants H. KARAYAN
20 and R. TEROGANESYAN, in a telephone conversation using coded
21 language, discussed their marijuana grow operations, and R.
22 TEROGANESYAN said he was expanding his marijuana grow.

23 370. On or about February 8, 2010, defendant H. KARAYAN,
24 in a telephone conversation using coded language, told defendant
25 R. TEROGANESYAN that H. KARAYAN had three marijuana grow sites
26 operating and was opening a fourth, and that each grow site
27 consisted of at least 150 marijuana plants.

28

1 371. On or about February 8, 2010, defendant R.
2 TEROGANESYAN, in a telephone conversation using coded language,
3 spoke with defendant H. KARAYAN and offered to take possession of
4 some of H. KARAYAN's marijuana plants, and R. TEROGANESYAN said
5 he could fit approximately 200 of H. KARAYAN's marijuana plants
6 at R. TEROGANESYAN's marijuana grow location.

7 372. On or about February 10, 2010, defendant H. KARAYAN
8 possessed approximately 2.38 kilograms of marijuana, a firearm,
9 namely, a Beretta model 96 .40 caliber semi-automatic pistol, and
10 ammunition, at his residence at 18536 Brasilia Drive, in
11 Northridge, California.

12 373. On or about April 26, 2010, defendant GAMBARYAN
13 brought a propane tank and bamboo stakes to a marijuana growing
14 facility that defendants H. KARAYAN, A. KARAYAN, GAMBARYAN,
15 Grigor Garibyan ("Garibyan"), Aram Khachatryan ("A.
16 Khachatryan"), Z. Karayan, and Hovannes Igarian ("Igarian") were
17 operating at 8239 Lankershim Boulevard, Unit D, in North
18 Hollywood, California (the "marijuana growing facility").

19 374. On or about April 26, 2010, defendants GAMBARYAN and
20 Garibyan unloaded the propane tank and bamboo stakes into the
21 marijuana growing facility.

22 375. On or about April 26, 2010, defendant Igarian arrived
23 at the marijuana growing facility in an SUV, met defendant
24 GAMBARYAN, and the two shook hands and entered the marijuana
25 growing facility.

26 376. On or about April 26, 2010, defendant Igarian exited
27 the marijuana growing facility, backed his SUV up to the door of
28

1 the marijuana growing facility, and opened the rear hatch of his
2 SUV.

3 377. On or about April 26, 2010, defendant GAMBARYAN
4 brought a black plastic bag of small marijuana plants out of the
5 marijuana growing facility.

6 378. On or about April 26, 2010, defendants GAMBARYAN and
7 Igarian loaded the bag of marijuana plants into Igarian's SUV.

8 379. On or about April 26, 2010, defendants H. KARAYAN,
9 Garibyan, A. Khachatryan, and Z. Karayan met inside the marijuana
10 growing facility.

11 380. On or about April 26, 2010, defendants GAMBARYAN, A.
12 Khachatryan, and Z. Karayan each possessed on his person a key to
13 the door of the marijuana growing facility.

14 381. On or about April 26, 2010, defendants H. KARAYAN, A.
15 KARAYAN, GAMBARYAN, Garibyan, A. Khachatryan, Z. Karayan, and
16 Igarian, and others known and unknown to the Grand Jury,
17 possessed approximately 567 marijuana plants, as well as
18 equipment used to grow marijuana, including one-gallon and five-
19 gallon pots containing potting soil, high wattage overhead light
20 bulbs with reflector shades, air conditioning units, dehumidifier
21 units, fans, carbon filter systems, watering tubs, a submersible
22 pump, and a carbon dioxide generator attached to a propane tank,
23 all inside the marijuana growing facility.

24 Additional Drug Trafficking Activities Engaged in by Members
25 of the Criminal Enterprise

26 382. On or about March 9, 2007, defendant BILEZIKCHYAN, in
27 a telephone conversation using coded language, spoke with a
28

1 Mexican Mafia member and discussed obtaining an ounce of drugs
2 from the Mexican Mafia member for approximately \$600.

3 383. On or about March 26, 2007, defendant BILEZIKCHYAN,
4 in a telephone conversation using coded language, told a Mexican
5 Mafia member that BILEZIKCHYAN had a kilogram of drugs for him.

6 384. On or about October 19, 2007, defendant K. YERKANYAN,
7 in a telephone conversation using coded language, agreed to
8 inquire with others regarding supplying drugs to a Mexican Mafia
9 member.

10 385. On or about December 5, 2007, defendant BILEZIKCHYAN,
11 in a telephone conversation using coded language, spoke with a
12 Mexican Mafia member and discussed obtaining methamphetamine from
13 the Mexican Mafia member.

14 386. On or about December 9, 2007, defendant BILEZIKCHYAN,
15 in a telephone conversation using coded language, arranged with a
16 Mexican Mafia member to pick up drugs from the Mexican Mafia
17 member's home.

18 387. On or about October 16, 2008, defendant HOVANISSIAN,
19 in a telephone conversation using coded language, discussed with
20 an unindicted co-conspirator smuggling drugs into the Los Angeles
21 County Jail, where HOVANISSIAN was incarcerated and selling drugs
22 within the jail.

23 388. On or about November 2, 2008, defendant HOVANISSIAN
24 and an unindicted co-conspirator, in a telephone conversation
25 using coded language, discussed having the unindicted co-
26 conspirator's girlfriend visit HOVANISSIAN in jail to deliver
27 drugs to him.

28

1 389. On or about November 3, 2008, defendant HOVANISSIAN
2 and an unindicted co-conspirator, in a telephone conversation
3 using coded language, discussed having the unindicted co-
4 conspirator's girlfriend and another woman visit HOVANISSIAN in
5 jail so that they could bring drugs to him as soon as possible.

6 390. On or about November 6, 2008, defendant HOVANISSIAN,
7 in a telephone conversation using coded language, told an
8 unindicted co-conspirator that he was upset with a woman who
9 delivered drugs to HOVANISSIAN in jail because the drug order had
10 been messed up.

11 391. On or about January 7, 2009, defendant HOVANISSIAN,
12 in a telephone conversation using coded language, discussed with
13 an unindicted co-conspirator smuggling fifteen grams of drugs to
14 HOVANISSIAN in jail through other inmates.

15 392. On or about June 27, 2009, defendant DARBINYAN, in a
16 telephone conversation using coded language, told defendant
17 ZAKARYAN that DARBINYAN had to send narcotics to friends inside
18 prison.

19 393. On or about July 12, 2009, defendant SHAROPETROSIAN,
20 in a telephone conversation using coded language, asked defendant
21 DARBINYAN to send him drugs in prison to distribute to others.

22 394. On or about July 13, 2009, defendant DARBINYAN, in a
23 telephone conversation using coded language, told defendant
24 SHAROPETROSIAN that DARBINYAN was going to send SHAROPETROSIAN,
25 who was incarcerated, marijuana and methamphetamine for
26 distribution to other inmates.

27 395. On or about July 14, 2009, defendant DARBINYAN, in a
28 telephone conversation using coded language, told defendant

1 SHAROPETROSIAN that DARBINYAN had acquired marijuana for
2 SHAROPETROSIAN.

3 396. On or about October 19, 2009, defendant DARBINYAN, in
4 a telephone conversation using coded language, asked defendant
5 Ramirez for heroin because DARBINYAN wanted to send it to someone
6 in prison.

7 397. On or about October 29, 2009, defendant BILEZIKCHYAN,
8 in a telephone conversation using coded language, asked defendant
9 DARBINYAN to send narcotics to an unindicted co-conspirator in
10 Miami, Florida, via overnight Federal Express.

11 398. On or about October 29, 2009, defendant DARBINYAN, in
12 a telephone conversation using coded language, asked defendant K.
13 YERKANYAN to find someone to take a package containing narcotics
14 to a Federal Express location, and DARBINYAN said that DARBINYAN
15 and K. YERKANYAN should not go inside the Federal Express
16 location to avoid showing their faces.

17 399. On or about October 29, 2009, defendant DARBINYAN, in
18 a telephone conversation using coded language, told an unindicted
19 co-conspirator to put a fake name and address on the return label
20 of the Federal Express package containing narcotics.

21 400. On or about October 30, 2009, defendant DARBINYAN
22 caused a Federal Express package containing approximately 216
23 grams of marijuana to be sent to Miami, Florida.

24 401. On or about November 17, 2009, defendant K.
25 YERKANYAN, in a telephone conversation using coded language,
26 discussed with defendant GAMBARYAN drugs that were supposed to be
27 sent into prison, and GAMBARYAN said that two grams were supposed
28

1 to be delivered into prison, but only one gram of drugs had
2 arrived at the prison.

3 402. On or about November 21, 2009, defendant K.
4 YERKANYAN, in a telephone conversation using coded language, told
5 defendant FERMANYAN to bring him an unspecified quantity of
6 marijuana, and FERMANYAN agreed to do so.

7 403. On or about February 8, 2010, defendant FERMANYAN, in
8 a telephone conversation using coded language, told defendant K.
9 YERKANYAN that FERMANYAN had lots of Oxycodone, and K. YERKANYAN
10 told FERMANYAN to bring him Oxycodone.

11 Illegal Gambling Business

12 404. On or about December 28, 2009, defendants
13 BILEZIKCHYAN and H. KARAYAN, in a telephone conversation using
14 coded language, discussed paying the rent for a gambling location
15 at 3450 Cahuenga Boulevard, in Los Angeles, California.

16 405. On or about January 14, 2010, defendant H. KARAYAN,
17 in a telephone conversation using coded language, spoke to an
18 unindicted co-conspirator about working as a waitress at an
19 upcoming poker tournament that he was organizing.

20 406. On or about January 18, 2010, defendants H. KARAYAN
21 and R. TEROGANESYAN, in a telephone conversation using coded
22 language, discussed hiring three dealers and at least three
23 waitresses for a poker tournament they were organizing the next
24 evening, and R. TEROGANESYAN said that they should bring about
25 5,000 gambling chips and that there should be enough players for
26 three gambling tables.

27 407. On or about January 18, 2010, defendant GAMBARYAN, in
28 a telephone conversation using coded language, told defendant H.

1 KARAYAN that he would contact a dealer about working at their
2 poker tournament the next evening, and GAMBARYAN said he would be
3 organizing another gambling game in two days.

4 408. On or about January 18, 2010, defendant H. KARAYAN,
5 in a telephone conversation using coded language, spoke to an
6 unindicted co-conspirator about working as a dealer at the poker
7 tournament the next evening, and H. KARAYAN told the dealer to
8 contact other dealers and tell them to dress nicely because there
9 would be high rollers at the poker tournament.

10 409. On or about January 18, 2010, defendant H. KARAYAN,
11 in a telephone conversation using coded language, spoke to an
12 unindicted co-conspirator about working as a waitress at the
13 poker tournament the next evening in which the first place prize
14 would be \$5,000, and H. KARAYAN said he would be hiring four
15 waitresses for three gambling tables.

16 410. On or about January 19, 2010, defendants H. KARAYAN
17 and GAMBARYAN, in a telephone conversation using coded language,
18 discussed meeting at the poker tournament that evening.

19 411. On or about January 21, 2010, defendants H. KARAYAN
20 and R. TEROGANESYAN, in a telephone conversation using coded
21 language, discussed a gambler who owed them approximately \$4,000
22 from the poker tournament they had organized two days before.

23 412. On or about January 22, 2010, defendants H. KARAYAN
24 and R. TEROGANESYAN, in a telephone conversation using coded
25 language, discussed a gambling tournament they had organized that
26 was currently taking place, and R. TEROGANESYAN said there was a
27 lot of money on the table and that many people had arrived so he
28 was going to open a second table.

1 413. On or about January 23, 2010, defendant GAMBARYAN, in
2 a telephone conversation using coded language, told defendant H.
3 KARAYAN that he was organizing a gambling tournament that would
4 take place in approximately one week, in which there would be
5 \$500 buy-ins, a first place prize of \$10,000, and a minimum of
6 four to five tables, and H. KARAYAN agreed to begin soliciting as
7 many players as he could find for this tournament.

8 414. On or about January 23, 2010, defendant R.
9 TEROGANESYAN, in a telephone conversation using coded language,
10 told defendant H. KARAYAN that the gambling tournament the night
11 before had gone until 11:30 a.m. the next day.

12 415. On or about January 25, 2010, defendants H. KARAYAN
13 and R. TEROGANESYAN, in a telephone conversation using coded
14 language, discussed what amounts to pay waitresses who worked at
15 their poker tournament, and R. TEROGANESYAN said the next game
16 would be the following day.

17 416. On or about January 27, 2010, defendant R.
18 TEROGANESYAN, in a telephone conversation using coded language,
19 told defendant H. KARAYAN that the gambling tournament the night
20 before had gone well and that many players owed them money, and
21 R. TEROGANESYAN said this was business and he needed his money.

22 417. On or about January 27, 2010, defendants H. KARAYAN
23 and GAMBARYAN, and others known and unknown to the Grand Jury,
24 possessed a poker table marked "Power Poker" with an Armenian
25 crest in the center, thousands of gambling chips, and gambling
26 pay-owe ledgers, listing amounts bet and owed, at 4055 Lankershim
27 Boulevard, in Los Angeles, California.

1 418. On or about February 2, 2010, defendant R.
2 TEROGANESYAN, in a telephone conversation using coded language,
3 mentioned a gambling player who would pay him between \$10,000 and
4 \$15,000, and R. TEROGANESYAN discussed with defendant H. KARAYAN
5 getting ready for a gambling game and hiring enough employees.

6 419. On or about February 10, 2010, defendant H. KARAYAN,
7 and others known and unknown to the Grand Jury, possessed two
8 gambling tables, thousands of gambling chips, and other gambling
9 paraphernalia, at 13847 Saticoy Street, in Los Angeles,
10 California.

11 420. On or about May 13, 2010, defendant GAMBARYAN, and
12 others known and unknown to the Grand Jury, possessed a poker
13 table, thousands of gambling chips, and gambling pay-owe sheets,
14 at 13429 Friar Street, in Los Angeles, California.

15 Additional Acts Related to the Criminal Enterprise

16 421. On or about January 9, 2007, defendant BILEZIKCHYAN,
17 in a telephone conversation using coded language, agreed to
18 provide a firearm to a Mexican Mafia member.

19 422. On or about January 19, 2007, defendant HOVANISSIAN,
20 in a telephone conversation using coded language, spoke with a
21 Mexican Mafia member and discussed protection that the Mexican
22 Mafia member would provide to HOVANISSIAN.

23 423. On or about January 19, 2007, defendant BILEZIKCHYAN,
24 in a telephone conversation using coded language, asked a Mexican
25 Mafia member to help protect defendant HOVANISSIAN in jail.

26 424. On or about January 29, 2007, defendant BILEZIKCHYAN,
27 in a telephone conversation using coded language, discussed with
28 a Mexican Mafia member how defendant DARBINYAN, who was

1 incarcerated, could send the Mexican Mafia member money collected
2 from other prison inmates.

3 425. On or about March 26, 2007, defendant BILEZIKCHYAN,
4 in a telephone conversation using coded language, told a Mexican
5 Mafia member that defendant DARBINYAN had money collected from
6 prison inmates for the Mexican Mafia member.

7 426. On or about April 19, 2007, defendant K. YERKANYAN,
8 in a telephone conversation using coded language, identified
9 himself to a Mexican Mafia member as an Armenian Power gang
10 member using the gang moniker "Guilty."

11 427. On or about December 15, 2007, defendant
12 BILEZIKCHYAN, in a telephone conversation using coded language,
13 offered advice and assistance to a Mexican Mafia member who
14 recently had a significant amount of money seized by police, and
15 BILEZIKCHYAN told the Mexican Mafia member that BILEZIKCHYAN
16 would be there to support him.

17 428. On or about November 5, 2008, defendant HOVANISSIAN,
18 in a telephone conversation using coded language, discussed with
19 defendant H. KARAYAN the status of other Armenian Power gang
20 members and associates who were in custody, and HOVANISSIAN and
21 H. KARAYAN discussed a prior shooting they had been charged with
22 in 2003.

23 429. On or about March 8, 2009, defendant DARBINYAN, in a
24 telephone conversation using coded language, discussed with
25 defendant MORENO, a Mexican Mafia member, the fact that MORENO
26 had finally been let out of prison and that prison officials had
27 investigated MORENO for his involvement in disturbances that had
28 occurred inside prison.

1 430. On or about April 25, 2009, defendant DARBINYAN, in a
2 telephone conversation using coded language, complained to
3 defendant SHAROPETROSIAN about police officers surveilling him,
4 and DARBINYAN told SHAROPETROSIAN that he did not care if he went
5 to jail for five or six years because he can do the time.

6 431. On or about April 25, 2009, defendant DARBINYAN, in a
7 telephone conversation using coded language, told defendant
8 SHAROPETROSIAN that DARBINYAN is a validated associate of the
9 Mexican Mafia.

10 432. On or about June 27, 2009, defendant DARBINYAN, in a
11 telephone conversation using coded language, discussed with
12 defendant SHAROPETROSIAN two Mexican Mafia members who were
13 father and son, and DARBINYAN referred to his close relationship
14 with defendant MORENO, another Mexican Mafia member.

15 433. On or about July 8, 2009, defendant DARBINYAN, in a
16 telephone conversation using coded language, discussed with an
17 unindicted co-conspirator that prison authorities had identified
18 the unindicted co-conspirator as an Armenian Power gang member,
19 and DARBINYAN said that prison authorities had done so due to the
20 unindicted co-conspirator's association with DARBINYAN.

21 434. On or about July 8, 2009, defendant DARBINYAN, in a
22 telephone conversation using coded language, discussed with
23 defendant SHAROPETROSIAN sending money to a Mexican Mafia
24 associate for protection in prison.

25 435. On or about July 17, 2009, defendant BILEZIKCHYAN, in
26 a telephone conversation using coded language, told defendant
27 DARBINYAN that BILEZIKCHYAN was going to visit a senior Mexican
28 Mafia member and discuss money.

1 436. On or about July 20, 2009, defendants SHAROPETROSIAN
2 and AIRAPETIAN, in a telephone conversation using coded language,
3 discussed whether AIRAPETIAN was interested in becoming a Thief-
4 in-Law, and SHAROPETROSIAN said they did not have to become
5 Thieves-in-Law to be financially strong.

6 437. On or about August 19, 2009, defendant PETROSIAN, in
7 a telephone conversation using coded language, asked defendant
8 DARBINYAN if an unindicted co-conspirator's brother was a member
9 of Armenian Power, and DARBINYAN said no way.

10 438. On or about August 28, 2009, defendant DARBINYAN, in
11 a telephone conversation using coded language, told an
12 incarcerated unindicted co-conspirator that DARBINYAN had been
13 validated by prison officials as an associate of the Mexican
14 Mafia because DARBINYAN controlled the prison yards when
15 DARBINYAN was incarcerated.

16 439. On or about September 9, 2009, defendant
17 BILEZIKCHYAN, in a telephone conversation using coded language,
18 told defendant K. YERKANYAN that if an Armenian kidnapping victim
19 goes to the police regarding his kidnapping by Mexican Mafia
20 associates, all imprisoned Armenians would be in jeopardy, and
21 BILEZIKCHYAN told K. YERKANYAN that they should call defendants
22 DARBINYAN, H. KARAYAN, and O. TEROGANESYAN, and other Armenian
23 Power leaders, to discuss the issue.

24 440. On or about September 9, 2009, defendant
25 BILEZIKCHYAN, in a telephone conversation using coded language,
26 discussed with defendant DARBINYAN an incident in which an
27 Armenian individual had been kidnapped by Mexican Mafia
28 associates, and BILEZIKCHYAN said that all incarcerated Armenians

1 would be in danger if the Armenian kidnapping victim got the
2 police involved, and DARBINYAN agreed.

3 441. On or about October 3, 2009, defendant DARBINYAN, in
4 a telephone conversation using coded language, told defendant
5 Antonyan that another high-level Armenian organized crime figure
6 had called DARBINYAN and told DARBINYAN that he respected
7 DARBINYAN as a Thief-in-Law.

8 442. On or about October 10, 2009, defendant DARBINYAN, in
9 a telephone conversation using coded language, told defendant
10 ZAKARYAN that DARBINYAN was going to take \$2,000 from an
11 unspecified victim and that DARBINYAN had to pay \$500 each to
12 four incarcerated Mexican Mafia members.

13 443. On or about October 13, 2009, defendant BILEZIKCHYAN,
14 in a telephone conversation using coded language, told defendant
15 DARBINYAN that the westside belonged to a senior Mexican Mafia
16 member and that the senior Mexican Mafia member was a friend of
17 Armenians.

18 444. On or about October 22, 2009, defendant BILEZIKCHYAN,
19 in a telephone conversation using coded language, told defendant
20 DARBINYAN that he had spoken to a recently imprisoned Mexican
21 Mafia member who told BILEZIKCHYAN that law enforcement officers
22 were listening to their telephone conversations, and BILEZIKCHYAN
23 told DARBINYAN that they had to change their telephone numbers as
24 soon as possible.

25 445. On or about December 3, 2009, defendant BILEZIKCHYAN,
26 in a telephone conversation using coded language, told defendant
27 K. YERKANYAN that BILEZIKCHYAN was going to have lunch with a
28 Mexican Mafia member and others to discuss recent arrests of

1 three Armenian Power gang members and associates, including
2 DARBINYAN.

3 446. On or about January 27, 2010, defendants E.
4 KHACHATRYAN and GAMBARYAN, and other members and associates of
5 Armenian Power, possessed a roster identifying Armenian Power
6 gang members.

7 All in violation of Title 18, United States Code, Section
8 1962(d).

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COUNT TWO

[18 U.S.C. § 1201(c)]

A. OBJECT OF THE CONSPIRACY

Beginning on a date unknown to the Grand Jury, but no later than on or about November 25, 2009, and continuing through on or about December 29, 2009, in Los Angeles County, within the Central District of California, and elsewhere, defendants PARAMAZ BILEZIKCHYAN, also known as ("aka") "Parik," aka "P," aka "Parnamas Bileziktsian," aka "Bleziktsian Paramas" ("BILEZIKCHYAN"), KARO YERKANYAN, aka "Guilty," aka "Gator," aka "Kane" ("K. YERKANYAN"), HAYK KARAYAN, aka "Hayko," aka "Whisper" ("H. KARAYAN"), ARAM PETROSIAN, aka "Tot," aka "Toto" ("PETROSIAN"), OGANES TEROGANESYAN, aka "Hovo," aka "Hovik," aka "Oganes Terognesyan" ("O. TEROGANESYAN"), and TIGRAN SARKISYAN, aka "Tiko" ("SARKISYAN"), and others known and unknown to the Grand Jury, conspired and agreed with each other to willfully and unlawfully seize, confine, inveigle, kidnap, abduct, and carry away victim G.A., and hold victim G.A. for ransom and reward and otherwise, and willfully used a means, facility, and instrumentality of interstate and foreign commerce in committing and in furtherance of the commission of such offense, in violation of Title 18, United States Code, Section 1201(a)(1).

B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE ACCOMPLISHED

The object of the conspiracy was to be accomplished, in substance, as follows:

1. Defendants BILEZIKCHYAN, K. YERKANYAN, PETROSIAN, and O. TEROGANESYAN, SARKISYAN, and others known and unknown to the

1 Grand Jury, would devise a plan to seize, confine, inveigle,
2 kidnap, abduct, and carry away victim G.A. from the Downtown
3 district of Los Angeles, California.

4 2. Defendants BILEZIKCHYAN, K. YERKANYAN, PETROSIAN, and
5 SARKISYAN, and others known and unknown to the Grand Jury, would
6 seize, confine, inveigle, kidnap, abduct, and carry away victim
7 G.A. to MR Auto Body Collision, located in Los Angeles,
8 California.

9 3. Defendants BILEZIKCHYAN, K. YERKANYAN, PETROSIAN, and
10 O. TEROGANESYAN, and others known and unknown to the Grand Jury,
11 would threaten victim G.A. with death and bodily harm if victim
12 G.A. did not pay and agree to pay a large sum of money for his
13 release.

14 4. Defendants BILEZIKCHYAN, K. YERKANYAN, H. KARAYAN,
15 PETROSIAN, O. TEROGANESYAN, and SARKISYAN, and others known and
16 unknown to the Grand Jury, would use multiple cellular telephones
17 to communicate during the course of and in furtherance of the
18 kidnapping of victim G.A.

19 C. OVERT ACTS

20 In furtherance of the conspiracy and to accomplish the
21 object of the conspiracy, defendants BILEZIKCHYAN, K. YERKANYAN,
22 H. KARAYAN, PETROSIAN, O. TEROGANESYAN, and SARKISYAN, and others
23 known and unknown to the Grand Jury, committed and caused to be
24 committed various overt acts on or about the following dates,
25 within the Central District of California, and elsewhere,
26 including, but not limited to, the following:

27 1. On or about November 25, 2009, defendant
28 BILEZIKCHYAN, in a telephone conversation using coded language,

1 told defendant SARKISYAN to pick BILEZIKCHYAN up to drive him to
2 the Downtown district of Los Angeles, California.

3 2. On or about November 25, 2009, defendant
4 BILEZIKCHYAN, in a telephone conversation using coded language,
5 told defendant K. YERKANYAN that BILEZIKCHYAN was headed to
6 downtown Los Angeles with defendant SARKISYAN to kidnap victim
7 G.A., and BILEZIKCHYAN asked K. YERKANYAN to contact defendants
8 H. KARAYAN and PETROSIAN to advise them to be prepared to assist
9 in kidnapping victim G.A., and K. YERKANYAN agreed to do so.

10 3. On or about November 25, 2009, defendant
11 BILEZIKCHYAN, in a telephone conversation using coded language,
12 told defendant K. YERKANYAN to talk to defendant PETROSIAN about
13 where they should take victim G.A. after they seize him, and K.
14 YERKANYAN said he would do so.

15 4. On or about November 25, 2009, defendant
16 BILEZIKCHYAN, in a telephone conversation using coded language,
17 told defendant O. TEROGANESYAN that he would be at O.
18 TEROGANESYAN's auto body shop, MR Auto Body Collision, in Los
19 Angeles, California, in about an hour, and O. TEROGANESYAN told
20 BILEZIKCHYAN he would be there for sure.

21 5. On or about November 25, 2009, defendants
22 BILEZIKCHYAN, K. YERKANYAN, PETROSIAN, and SARKISYAN, and others
23 known and unknown to the Grand Jury, seized, confined, inveigled,
24 kidnapped, abducted, and carried away victim G.A. to MR Auto Body
25 Collision, an auto body shop owned by defendant O. TEROGANESYAN
26 in Los Angeles, California.

1 6. On or about November 25, 2009, defendants
2 BILEZIKCHYAN and SARKISYAN carried out a ruse phone call designed
3 to instill the fear of death in victim G.A.

4 7. On or about November 25, 2009, defendants
5 BILEZIKCHYAN, K. YERKANYAN, PETROSIAN, and SARKISYAN confronted
6 victim G.A. while some of them were wearing masks with the
7 intention of instilling the fear of death in victim G.A.

8 8. On or about November 25, 2009, defendant K.
9 YERKANYAN, in a telephone conversation using coded language, told
10 defendant H. KARAYAN that he and others had taken victim G.A.,
11 who was with them, and H. KARAYAN offered to help.

12 9. On or about November 25, 2009, defendant BILEZIKCHYAN
13 told victim G.A. that victim G.A. had to pay BILEZIKCHYAN
14 \$100,000 to be released.

15 10. On or about November 25, 2009, defendant BILEZIKCHYAN
16 told victim G.A. that victim G.A. would need to pay BILEZIKCHYAN
17 \$400,000 to avoid future kidnappings.

18 11. On or about November 25, 2009, defendants K.
19 YERKANYAN, PETROSIAN, and others known and unknown to the Grand
20 Jury, took victim G.A. away from defendant O. TEROGANESYAN's auto
21 body shop to collect money that was being paid to secure victim
22 G.A.'s release.

23 12. On or about November 25, 2009, defendant PETROSIAN,
24 in a telephone conversation using coded language, told defendant
25 BILEZIKCHYAN that PETROSIAN was sitting outside victim G.A.'s
26 building waiting for victim G.A. to bring money to him.

1 13. On or about November 26, 2009, defendant
2 BILEZIKCHYAN, in a telephone conversation using coded language,
3 discussed with defendant K. YERKANYAN splitting \$200,000 in
4 proceeds from the kidnapping of victim G.A.

5 14. On or about December 24, 2009, defendant H. KARAYAN,
6 in a telephone conversation using coded language, told defendant
7 BILEZIKCHYAN that victim G.A. had a lot of gold hidden, and
8 BILEZIKCHYAN told H. KARAYAN to tell victim G.A. that Monday was
9 the last day to pay the money owed in connection with the
10 kidnapping.

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COUNT THREE

[18 U.S.C. §§ 1201(a)(1), 2]

On or about November 25, 2009, in Los Angeles County, within the Central District of California, and elsewhere, defendants PARAMAZ BILEZIKCHYAN, also known as ("aka") "Parik," aka "P," aka "Parnamas Bileziktsian," aka "Bleziktsian Paramas," KARO YERKANYAN, aka "Guilty," aka "Gator," aka "Kane," HAYK KARAYAN, aka "Hayko," aka "Whisper," ARAM PETROSIAN, aka "Tot," aka "Toto," OGANES TEROGANESYAN, aka "Hovo," aka "Hovik," aka "Oganes Terognesyian," and TIGRAN SARKISYAN, aka "Tiko," and others known and unknown to the Grand Jury, willfully and unlawfully seized, confined, inveigled, kidnapped, abducted, and carried away victim G.A., and held victim G.A. for ransom and reward and otherwise, and used a means, facility, and instrumentality of interstate and foreign commerce in committing and in furtherance of the commission of such offense, and aided, abetted, counseled, commanded, induced, and procured the commission of such offense.

COUNT FOUR

[18 U.S.C. § 1951(a)]

A. OBJECT OF THE CONSPIRACY

Beginning on a date unknown to the Grand Jury, but no later than on or about June 27, 2009, and continuing through in or around December 2009, in Los Angeles County, within the Central District of California, and elsewhere, defendants MHER DARBINYAN, also known as ("aka") "Mike," aka "Hollywood Mike," aka "Little Mike," aka "Capone," aka "Caps," aka "Maher" ("DARBINYAN"), ARMAN SHAROPETROSIAN, aka "Horse," aka "Dzi" ("SHAROPETROSIAN"), EMIL AIRAPETIAN, aka "Clever," aka "Emo" ("AIRAPETIAN"), and LUSINE OGANDGANYAN, aka "Lusine Ogandjanian," aka "Luso" ("L. OGANDGANYAN"), and others known and unknown to the Grand Jury, conspired and agreed with each other to knowingly obstruct, delay, and affect commerce and the movement of any article or commodity in commerce by extortion, and threatened physical violence to victim M.M. in furtherance of a plan and purpose to obstruct, delay, and affect commerce and the movement of any article or commodity in commerce by extortion, in violation of Title 18, United States Code, Section 1951(a).

B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE ACCOMPLISHED

The object of the conspiracy was to be accomplished, in substance, as follows:

1. Defendants DARBINYAN and SHAROPETROSIAN would devise a plan to extort money from victim M.M.

1 2. Defendants DARBINYAN, SHAROPETROSIAN, AIRAPETIAN, and
2 L. OGANDGANYAN would threaten victim M.M. with death and serious
3 bodily harm to victim M.M. and victim M.M.'s family if victim
4 M.M. did not pay a large sum of money to DARBINYAN,
5 SHAROPETROSIAN, AIRAPETIAN, and L. OGANDGANYAN, and others known
6 and unknown to the Grand Jury.

7 3. Defendants DARBINYAN, SHAROPETROSIAN, AIRAPETIAN, and
8 L. OGANDGANYAN would contact victim M.M. and instruct him to pay
9 specific amounts of money via cash or wire transfers and specify
10 the date, time, and location for the payment of the money.

11 C. OVERT ACTS

12 In furtherance of the conspiracy and to accomplish the
13 object of the conspiracy, defendants DARBINYAN, SHAROPETROSIAN,
14 AIRAPETIAN, and L. OGANDGANYAN, and others known and unknown to
15 the Grand Jury, committed and caused to be committed various
16 overt acts on or about the following dates, within the Central
17 District of California, and elsewhere, including, but not limited
18 to, the following:

19 1. On or about June 27, 2009, defendant SHAROPETROSIAN,
20 in a telephone conversation using coded language, discussed with
21 defendant DARBINYAN seizing and holding victim M.M. until victim
22 M.M.'s father brought them money.

23 2. On or about June 29, 2009, defendant SHAROPETROSIAN
24 initiated a three-way call between defendant DARBINYAN and victim
25 M.M. and threatened victim M.M. with bodily harm if he did not
26 pay money to SHAROPETROSIAN and DARBINYAN.

1 3. On or about June 30, 2009, defendant DARBINYAN, in a
2 telephone conversation using coded language, told defendant
3 SHAROPETROSIAN that DARBINYAN had met with victim M.M. and
4 threatened him with physical violence if he did not pay money,
5 and SHAROPETROSIAN said victim M.M. should pay \$70,000 to
6 defendant L. OGANDGANYAN and additional money to them.

7 4. On or about July 3, 2009, defendant SHAROPETROSIAN,
8 in a telephone conversation using coded language, told defendant
9 DARBINYAN to threaten victim M.M. with physical harm if victim
10 M.M. did not pay money to SHAROPETROSIAN and DARBINYAN.

11 5. On or about July 4, 2009, defendant SHAROPETROSIAN,
12 in a telephone conversation using coded language, told defendant
13 DARBINYAN to inform victim M.M. that victim M.M. would be
14 kidnapped for three months if he did not pay money to
15 SHAROPETROSIAN.

16 6. On or about July 4, 2009, defendant SHAROPETROSIAN
17 initiated a three-way call with defendant DARBINYAN and victim
18 M.M., and SHAROPETROSIAN and DARBINYAN told victim M.M. that they
19 would kidnap victim M.M. if victim M.M. and his family did not
20 pay money to SHAROPETROSIAN, DARBINYAN, and defendant L.
21 OGANDGANYAN.

22 7. On or about July 6, 2009, defendant SHAROPETROSIAN,
23 in a telephone conversation using coded language, discussed with
24 defendant DARBINYAN how much money they intended to obtain from
25 victim M.M. that day using threats of physical harm.

26 8. On or about July 6, 2009, defendant DARBINYAN, in a
27 telephone conversation using coded language, told victim M.M.
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1 that DARBINYAN would hurt victim M.M. if victim M.M. did not pay
2 him money.

3 9. On or about July 8, 2009, defendant DARBINYAN, in a
4 telephone conversation using coded language, demanded money from
5 victim M.M.

6 10. On or about July 9, 2009, defendants DARBINYAN and
7 SHAROPETROSIAN, in a telephone conversation using coded language,
8 discussed how to obtain money from victim M.M., and
9 SHAROPETROSIAN said that some of the money would go to defendant
10 L. OGANDGANYAN.

11 11. On or about August 30, 2009, defendant
12 SHAROPETROSIAN, using coded language on the telephone, demanded
13 money from victim M.M.

14 12. On or about August 31, 2009, defendant
15 SHAROPETROSIAN, in a telephone conversation using coded language,
16 instructed victim M.M. to meet an unindicted co-conspirator to
17 deliver money to her under threat of physical harm.

18 13. On or about September 3, 2009, defendant
19 SHAROPETROSIAN, in a telephone conversation using coded language,
20 demanded \$100,000 from victim M.M. under threat of physical harm.

21 14. On or about September 4, 2009, defendant
22 SHAROPETROSIAN, in a telephone conversation using coded language,
23 told victim M.M. that victim M.M. would be killed.

24 15. On or about September 11, 2009, defendants
25 SHAROPETROSIAN and L. OGANDGANYAN, in a telephone conversation
26 using coded language, spoke with victim M.M. and demanded money
27 from victim M.M. under threat of physical harm.

1 16. On or about October 16, 2009, in response to threats
2 of violence and physical harm from defendants DARBINYAN,
3 SHAROPETROSIAN, AIRAPETIAN, and L. OGANDGANYAN, and others,
4 victim M.M. wired approximately \$1,000 using Moneygram.

5 17. On or about October 20, 2009, in response to threats
6 of violence and physical harm from defendants DARBINYAN,
7 SHAROPETROSIAN, AIRAPETIAN, and L. OGANDGANYAN, and others,
8 victim M.M. wired approximately \$1,500 using Moneygram.

9 18. On or about October 28, 2009, defendant
10 SHAROPETROSIAN, in a telephone conversation using coded language,
11 instructed victim M.M. to make deposits into certain bank
12 accounts and to use either Western Union or Moneygram to send
13 money to SHAROPETROSIAN and his co-conspirators under threat of
14 violence.

15 19. On or about October 29, 2009, defendant AIRAPETIAN,
16 in a telephone conversation using coded language, demanded money
17 from victim M.M. and threatened victim M.M. with violence if
18 victim M.M. did not pay the money.

19 20. On or about October 29, 2009, defendant AIRAPETIAN,
20 in a telephone conversation using coded language, arranged a
21 meeting with victim M.M. for the purpose of obtaining money from
22 victim M.M., and, later that day, obtained approximately \$1,900
23 from victim M.M. under threat of physical harm.

24 21. On or about October 29, 2009, defendant AIRAPETIAN,
25 in a telephone conversation using coded language, demanded
26 \$10,000 from victim M.M. and threatened to disfigure victim M.M.
27 if he did not pay.

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1 22. On or about October 30, 2009, defendant
2 SHAROPETROSIAN, in a telephone conversation using coded language,
3 instructed victim M.M. to make deposits into particular bank
4 accounts under threat of physical harm.

5 23. On or about October 30, 2009, in response to threats of
6 violence and physical harm from defendants DARBINYAN,
7 SHAROPETROSIAN, AIRAPETIAN, and L. OGANDGANYAN, and others,
8 victim M.M. wired over \$1,500 using Western Union.

9 24. On or about October 31, 2009, defendant
10 SHAROPETROSIAN, in a telephone conversation using coded language,
11 demanded \$2,000 from victim M.M.

12 26. On or about November 1, 2009, defendant
13 SHAROPETROSIAN, in a telephone conversation using coded language,
14 demanded \$10,000 from victim M.M.

15 27. On or about November 2, 2009, defendant
16 SHAROPETROSIAN, in a telephone conversation using coded language,
17 demanded that victim M.M. take \$1,000 to an unindicted co-
18 conspirator that night.

19 28. On or about November 2, 2009, victim M.M. paid \$500
20 to an unindicted co-conspirator.

21 29. On or about November 2, 2009, defendant
22 SHAROPETROSIAN, in a telephone conversation using coded language,
23 told victim M.M. that SHAROPETROSIAN would slaughter victim M.M.
24 if victim M.M. did not deposit money as directed by
25 SHAROPETROSIAN.

26 30. On or about November 4, 2009, defendant
27 SHAROPETROSIAN, in a telephone conversation using coded language,
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1 demanded \$2,500 in cash from victim M.M. and said he would send
2 someone over to pick up the money from victim M.M.

3 31. On or about November 4, 2009, an unindicted co-
4 conspirator known to the Grand Jury picked up \$2,000 from victim
5 M.M.

6 32. On or about November 5, 2009, defendant
7 SHAROPETROSIAN, in a telephone conversation using coded language,
8 asked victim M.M. when victim M.M. would be able to obtain money.

9 33. On or about November 6, 2009, defendant
10 SHAROPETROSIAN, in a telephone conversation using coded language,
11 asked victim M.M. whether victim M.M. had sent the money demanded
12 by SHAROPETROSIAN under threat of physical harm using Western
13 Union or Moneygram.

14 34. On or about November 12, 2009, defendant L.
15 OGANDGANYAN, and others known and unknown to the Grand Jury, met
16 with victim M.M. and demanded money from victim M.M.

17 35. On or about November 19, 2009, defendant L.
18 OGANDGANYAN, in a telephone conversation using coded language,
19 told victim M.M. that victim M.M. had to pay her money under
20 threat of physical harm.

21 36. On or about November 21, 2009, defendant L.
22 OGANDGANYAN, using coded language on the telephone, threatened to
23 kill victim M.M.'s family if victim M.M. did not pay money to L.
24 OGANDGANYAN.

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COUNT FIVE

[18 U.S.C. §§ 1951(a), 2]

Beginning on a date unknown to the Grand Jury, but no later than on or about June 27, 2009, and continuing through in or around December 2009, in Los Angeles County, within the Central District of California, and elsewhere, defendants MHER DARBINYAN, also known as ("aka") "Mike," aka "Hollywood Mike," aka "Little Mike," aka "Capone," aka "Caps," aka "Maher," ARMAN SHAROPETROSIAN, aka "Horse," aka "Dzi," EMIL AIRAPETIAN, aka "Clever," aka "Emo," and LUSINE OGANDGANYAN, aka "Lusine Ogandjanian," aka "Luso," and others known and unknown to the Grand Jury, knowingly obstructed, delayed, and affected commerce and the movement of any article or commodity in commerce by extortion, and threatened physical violence to victim M.M. in furtherance of a plan to obstruct, delay, and affect commerce and the movement of any article or commodity in commerce by extortion, and aided, abetted, counseled, commanded, induced, and procured the commission of such offense.

COUNTS SIX THROUGH TWENTY-TWO

[18 U.S.C. § 1344]

A. INTRODUCTORY ALLEGATIONS

1. At all times pertinent to this Indictment, the deposits of Bank of America, Citibank, and JP Morgan Chase Bank were federally insured.

B. THE FRAUDULENT SCHEME

2. Beginning in or around July 2008, and continuing through on or about December 15, 2010, in Los Angeles and Orange Counties, within the Central District of California, and elsewhere, defendants MHER DARBINYAN, also known as ("aka") "Mike," aka "Hollywood Mike," aka "Little Mike," aka "Capone," aka "Caps," aka "Maher" ("DARBINYAN"), ARMAN TANGABEKYAN, aka "Spito," aka "Spitak," aka "Villager," aka "Thick Neck," aka "Armancho" ("TANGABEKYAN"), KAREN MARKOSIAN, aka "Kar," aka "Garen" ("MARKOSIAN"), VAHE MNATSAKANYAN, aka "V," aka "Vahik" ("MNATSAKANYAN"), ARMANDO MORENO, aka "Mando," aka "Monkey," aka "Blackie" ("MORENO"), LUSINE OGANDGANYAN, aka "Lusine Ogandjanian," aka "Luso" ("L. OGANDGANYAN"), GUSTAVO ORTEGA, aka "Bam Bam," aka "Bams," aka "Gus" ("ORTEGA"), HAGOP YAMALYAN, aka "Hago" ("YAMALYAN"), MANUK TERZIAN, aka "Max" ("TERZIAN"), KAREN HESHAM SAMAWI, aka "Karen Hesham" ("SAMAWI"), JULIO CESAR RIVAS, aka "July," aka "Biggie," aka "Big Boy" ("RIVAS"), VARTAN AVEDISSIAN, aka "Vardan," aka "Voicebox" ("AVEDISSIAN"), JOSEPH MARES ("MARES"), DEBRA MAY-LAWSON, aka "Sugar" ("MAY-LAWSON"), RAFAEL ROGER ZENDEJAS ("ZENDEJAS"), STEVEN WILSON, aka "Stutters" ("WILSON"), FNU LNU, aka "Musho" ("MUSHO"), and FNU LNU, aka

1 "David Petrosov" ("PETROSOV"), together with others known and
2 unknown to the Grand Jury, knowingly and with intent to defraud,
3 devised, executed, and attempted to execute a scheme to defraud
4 Bank of America, Citibank, JP Morgan Chase Bank, and other
5 financial institutions as to material matters, and to obtain
6 money and property from Bank of America, Citibank, JP Morgan
7 Chase Bank, and other financial institutions by means of material
8 false and fraudulent pretenses, representations, and promises,
9 and the concealment of material facts.

10 3. The fraudulent scheme operated, in substance, in the
11 following manner:

12 a. Defendants DARBINYAN, TANGABEKYAN, MARKOSIAN,
13 MNATSAKANYAN, L. OGANDGANYAN, and YAMALYAN, and other co-
14 schemers, obtained bank account information belonging to victim-
15 account owners, including their names, personal identifying
16 information, and victim-account values, without the victim-
17 account owners' consent, knowledge, or authorization.

18 b. Defendant DARBINYAN, TANGABEKYAN, MARKOSIAN, and
19 L. OGANDGANYAN, and other co-schemers, transferred money from the
20 victim-account owners' accounts and deposited it into other
21 accounts controlled by the co-schemers, thereby depleting the
22 victim-accounts.

23 c. Defendants DARBINYAN, TANGABEKYAN, MARKOSIAN,
24 MNATSAKANYAN, MORENO, L. OGANDGANYAN, ORTEGA, YAMALYAN, TERZYAN,
25 SAMAWI, RIVAS, AVEDISSIAN, MARES, MAY-LAWSON, ZENDEJAS, WILSON,
26 and PETROSOV, and other co-schemers, prepared, forged, and
27 obtained fraudulent checks corresponding to the victim-accounts
28

1 without the victim-account owners' consent, knowledge, or
2 authorization.

3 d. Defendants DARBINYAN, TANGABEKYAN, MARKOSIAN,
4 MNATSAKANYAN, MORENO, L. OGANDGANYAN, ORTEGA, YAMALYAN, TERZYAN,
5 SAMAWI, RIVAS, AVEDISSIAN, MARES, MAY-LAWSON, ZENDEJAS, WILSON,
6 and PETROSOV, and other co-schemers, cashed and deposited, and
7 attempted to cash and deposit, fraudulent checks drawn on the
8 victim-accounts without the victim-account owners' consent,
9 knowledge, or authorization.

10 e. Defendants DARBINYAN, TERZYAN, ORTEGA, and RIVAS,
11 and other co-schemers, drove and transported other co-schemers
12 for purposes of cashing and depositing, and attempting to cash
13 and deposit, fraudulent checks for victim-accounts without the
14 victim-account owners' consent, knowledge, or authorization.

15 f. Defendants DARBINYAN, TANGABEKYAN, MARKOSIAN,
16 MNATSAKANYAN, and L. OGANDGANYAN, and other co-schemers, tracked
17 the victim-accounts to determine if money had been successfully
18 drawn from the victim-accounts.

19 g. Defendants DARBINYAN, TANGABEKYAN, MARKOSIAN,
20 MNATSAKANYAN, MORENO, L. OGANDGANYAN, ORTEGA, YAMALYAN, TERZYAN,
21 SAMAWI, RIVAS, AVEDISSIAN, MARES, MAY-LAWSON, ZENDEJAS, WILSON,
22 and PETROSOV, and other co-schemers, distributed proceeds from
23 the fraudulent bank fraud scheme amongst themselves.

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1 C. THE EXECUTION OF THE SCHEME

2 4. On or about the following dates, within the Central
3 District of California, and elsewhere, defendants DARBINYAN,
4 TANGABEKYAN, MARKOSIAN, MNATSAKANYAN, MORENO, L. OGANDGANYAN,
5 ORTEGA, YAMALYAN, TERZYAN, SAMAWI, RIVAS, AVEDISSIAN, MARES, MAY-
6 LAWSON, ZENDEJAS, WILSON, MUSHO, and PETROSOV, and others known
7 and unknown to the Grand Jury, committed and willfully caused
8 others to commit the following acts, each of which constituted an
9 execution and attempted execution of the fraudulent scheme:

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COUNT	DATE	ACT
SIX	1/26/09	Cashing of check number 3439, made payable to "Rafael Zendejas" in the amount of \$10, drawn on Bank of America account number xxxxx-42953, in the name of victim P.J.C.
SEVEN	1/26/09	Deposit of check number 3442, made payable to "Joseph Mares" in the amount of \$15, drawn on Bank of America account number xxxxx-42953, in the name of victim P.J.C.
EIGHT	1/28/09	Cashing of check number 3438, made payable to "Debra Jane May Lawson" in the amount of \$5,600, and check number 3443, made payable to "Debra Jane May-Lawson" in the amount of \$5,600, both drawn on Bank of America account number xxxxx-42953, in the name of victim P.J.C.
NINE	1/28/09	Submission of check number 3444, made payable to "Rafael Roger Zendejas" in the amount of \$5,900, drawn on Bank of America account number xxxxx-42953, in the name of victim P.J.C.
TEN	3/9/09	Transfer of \$45,000 from Bank of America account number xxxxx-68791, a trust account in the name of victim G.F., to Bank of America account number xxxxx-40707, a checking account in the name of victim G.F.

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1	ELEVEN	3/17/09	Deposit of check number 1462, made payable to "Karen Hesham" in the amount of
2			\$26,400, drawn on Bank of America account
3			number xxxxx-40707, in the name of victim
4			G.F.
4	TWELVE	3/18/09	Deposit of check number 1463, made payable
5			to "Karen Hesham" in the amount of
6			\$38,000, drawn on Bank of America account
7			number xxxxx-40707, in the name of victim
8			G.F.
7	THIRTEEN	3/19/09	Transfer of \$40,000 from Bank of America
8			account number xxxxx-68791, a trust
9			account in the name of victim G.F., to
10			Bank of America account number xxxxx-
11			40707, a checking account in the name of
12			victim G.F.
10	FOURTEEN	3/30/09	Cashing of check number 304, made payable
11			to "Steven A Wilson" in the amount of
12			\$4,500, drawn on Bank of America account
13			number xxxxx-13899, in the name of victim
14			Y.G.
13	FIFTEEN	3/30/09	Cashing of check number 305, made payable
14			to "Joseph Mares" in the amount of \$5,300,
15			drawn on Bank of America account number
16			xxxxx-13899, in the name of victim Y.G.
16	SIXTEEN	3/30/09	Cashing of check number 306, made payable
17			to "Joseph Mares" in the amount of \$5,000,
18			drawn on Bank of America account number
19			xxxxx-13899, in the name of victim Y.G.
18	SEVENTEEN	4/14/09	Deposit of check number 2386, made payable
19			to "RZ Dignet" in the amount of
20			\$28,357.00, drawn on Bank of America
21			account number XXXXX-14509, in the names
22			of victims F.D. and M.D.
21	EIGHTEEN	4/14/09	Attempted cashing and deposit of check
22			number 2387, made payable to "David
23			Petrosov" in the amount of \$74,350.09,
24			drawn on Bank of America account number
25			XXXXX-14509, in the names of victims F.D.
26			and M.D.
24	NINETEEN	4/16/09	Deposit of check number 1459, made payable
25			to "Ruzanna Hakobyan" in the amount of
26			\$135,200, drawn on Citibank account number
27			xxxx-7159, in the name of victim L.R.

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TWENTY	6/21/09	Acquisition of balance and recent account activity for JP Morgan Chase Bank account number xxxxx-81458, in the name of victim R.M.
TWENTY-ONE	6/22/09	Acquisition of balance and recent account activity for JP Morgan Chase Bank account number xxxxx-94403, in the name of victims J.D. and M.D.
TWENTY-TWO	6/22/09	Acquisition of balance and recent account activity for JP Morgan Chase Bank account number xxxxx-57257, in the name of victim R.T.

COUNTS TWENTY-THREE THROUGH THIRTY-SEVEN

[18 U.S.C. §§ 1028A(a) (1), 2]

On or about the dates specified below, in Los Angeles and Orange Counties, within the Central District of California, and elsewhere, the defendants named below, while aiding and abetting each other, and together with others known and unknown to the Grand Jury, knowingly transferred, possessed, and used, and willfully caused to be transferred, possessed, and used, without lawful authority, a means of identification of another person, as specified below, during and in relation to Bank Fraud, a felony violation of Title 18, United States Code, Section 1344, as charged in Counts Six through Twenty-Two of this Indictment:

COUNT	DATE	DEFENDANT(S)	MEANS OF IDENTIFICATION
TWENTY-THREE	1/26/09	MHER DARBINYAN, aka "Mike," aka "Hollywood Mike," aka "Little Mike," aka "Capone," aka "Caps," aka "Maher" ("DARBINYAN"); GUSTAVO ORTEGA, aka "Bam Bam," aka "Bams," aka "Gus" ("ORTEGA"); JOSEPH MARES ("MARES")	Name, Account Number, and Signature of victim M.A.
TWENTY-FOUR	1/26/09	DARBINYAN; ORTEGA; RAFAEL ROGER ZENDEJAS ("ZENDEJAS")	Name, Account Number, and Signature of victim M.A.

COUNT	DATE	DEFENDANT (S)	MEANS OF IDENTIFICATION
TWENTY-FIVE	1/28/09	DARBINYAN; ORTEGA; MANUK TERZYAN, aka "Max" ("TERZYAN"); JULIO CESAR RIVAS, aka "July," aka "Biggie," aka "Big Boy"; ZENDEJAS	Name, Account Number, and Signature of victim M.A.
TWENTY-SIX	1/28/09	DARBINYAN; ORTEGA; TERZYAN; DEBRA MAY-LAWSON, aka "Sugar"	Name, Account Number, and Signature of victim M.A.
TWENTY-SEVEN	3/17/09	DARBINYAN; ARMAN TANGABEKYAN, aka "Spito," aka "Spitak," aka "Villager," aka "Thick Neck," aka "Armancho" ("TANGABEKYAN"); VAHE MNATSAKANYAN, aka "V," aka "Vahik" ("MNATSAKANYAN"); ARMANDO MORENO, aka "Mando," aka "Monkey," aka "Blackie" ("MORENO"); TERZYAN; KAREN HESHAM SAMAWI, aka "Karen Hesham" ("SAMAWI"); VARTAN AVEDISSIAN, aka "Vardan," "aka "Voicebox" ("AVEDISSIAN")	Name, Account Number, and Signature of victim G.F.
TWENTY-EIGHT	3/18/09	DARBINYAN; TANGABEKYAN; MNATSAKANYAN; MORENO; TERZYAN; SAMAWI; AVEDISSIAN	Name, Account Number, and Signature of victim G.F.

COUNT	DATE	DEFENDANT(S)	MEANS OF IDENTIFICATION
TWENTY-NINE	3/30/09	DARBINYAN; ORTEGA; TERZYAN; MARES; STEVEN WILSON, aka "Stutters" ("WILSON")	Name, Account Number, and Signature of victim Y.G.
THIRTY	3/30/09	DARBINYAN; ORTEGA; TERZYAN; MARES; WILSON	Name, Account Number, and Signature of victim Y.G.
THIRTY-ONE	3/30/09	DARBINYAN; ORTEGA; TERZYAN; MARES; WILSON	Name, Account Number, and Signature of victim Y.G.
THIRTY-TWO	4/14/09	DARBINYAN; TANGABEKYAN; HAGOP YAMALYAN, aka "Hago" ("YAMALYAN"); TERZYAN	Names, Account Number, and Signatures of victims F.D. and M.D.
THIRTY-THREE	4/14/09	DARBINYAN; TANGABEKYAN; LUSINE OGANDGANYAN, aka "Lusine Ogandjanian," aka "Luso" ("L. OGANDGANYAN"); YAMALYAN; TERZYAN; FNU LNU, aka "David Petrosov"	Names, Account Number, and Signatures of victims F.D. and M.D.
THIRTY-FOUR	4/16/09	DARBINYAN; KAREN MARKOSIAN, aka "Kar," aka "Garen" ("MARKOSIAN"); MNATSAKANYAN; L. OGANDGANYAN; ORTEGA	Name, Account Number, and Signature of victim L.R.

COUNT	DATE	DEFENDANT(S)	MEANS OF IDENTIFICATION
THIRTY-FIVE	6/22/09	TANGABEKYAN	Account Number and Social Security Number of victim R.M.
THIRTY-SIX	6/22/09	TANGABEKYAN	Account Number and Social Security Number of victim J.D.
THIRTY-SEVEN	6/22/09	TANGABEKYAN	Account Number and Social Security Number of victim R.T.

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COUNTS THIRTY-EIGHT THROUGH SIXTY-EIGHT

[18 U.S.C. § 1344]

A. INTRODUCTORY ALLEGATIONS

1. At all times pertinent to this Indictment, the deposits of Bank of America, Guaranty Bank, Altura Credit Union, Ventura County Credit Union, Schools First Credit Union, and U.S. Bank were federally insured.

B. THE FRAUDULENT SCHEME

2. Beginning in or around July 2009, and continuing through in or around August 2009, in Los Angeles County, within the Central District of California, and elsewhere, defendants MHER DARBINYAN, also known as ("aka") "Mike," aka "Hollywood Mike," aka "Little Mike," aka "Capone," aka "Caps," aka "Maher" ("DARBINYAN"), ARAM PETROSIAN, aka "Tot," aka "Toto" ("PETROSIAN"), RAYMOND TARVERDYAN, aka "Rye," aka "Ray" ("TARVERDYAN"), GUSTAVO ORTEGA, aka "Bam Bam," aka "Bams," "Gus" ("ORTEGA"), RAFAEL PARSADANYAN, aka "Raffi," aka "Raffo" ("PARSADANYAN"), SIMON ANTONYAN, aka "Simo," aka "Sim" ("ANTONYAN"), GAREN CHOOLDJIAN, aka "Misak" ("CHOOLDJIAN"), ANDRANIK BAKHCHADJIAN, aka "Ando," aka "Andranik Bakhcadjian" ("BAKHCHADJIAN"), VARTENIE ANANIAN ("ANANIAN"), KHACHATUR ARAKELYAN, aka "Khecho" ("ARAKELYAN"), CATRINA BALDERRAMA ("BALDERRAMA"), and VARDAN AMIRKHANYAN ("AMIRKHANYAN"), together with others known and unknown to the Grand Jury, knowingly and with intent to defraud, devised, executed, and attempted to execute a scheme to defraud Bank of America, Guaranty Bank, Altura Credit Union, Ventura County Credit Union, Schools First

1 Credit Union, U.S. Bank, and other financial institutions as to
2 material matters, and to obtain money and property from Bank of
3 America, Guaranty Bank, Altura Credit Union, Ventura County
4 Credit Union, Schools First Credit Union, U.S. Bank, and other
5 financial institutions by means of material false and fraudulent
6 pretenses, representations, and promises, and the concealment of
7 material facts.

8 3. The fraudulent scheme operated, in substance, in the
9 following manner:

10 a. Defendants DARBINYAN and ANTONYAN, and others
11 known and unknown to the Grand Jury, obtained skimming devices
12 and distributed them to other co-schemers, including defendants
13 TARVERDYAN, ORTEGA, BAKHCHADJIAN, ANANIAN, and BALDERRAMA.

14 b. Defendants TARVERDYAN, ORTEGA, BAKHCHADJIAN,
15 ANANIAN, and BALDERRAMA, and others known and unknown to the
16 Grand Jury, installed the skimming devices at 99 Cents Only
17 Stores throughout Southern California, including within the
18 Central District of California.

19 c. After the skimming devices had gathered account
20 numbers and access codes belonging to victim-account owners,
21 defendants TARVERDYAN, ORTEGA, BAKHCHADJIAN, ANANIAN, BALDERRAMA,
22 and others known and unknown to the Grand Jury, retrieved the
23 skimming devices from the 99 Cents Only Stores.

24 d. Defendants DARBINYAN, TARVERDYAN, PARSADANYAN, and
25 ANTONYAN, and others known and unknown to the Grand Jury,
26 distributed the victim-account numbers, fraudulently obtained
27 using the skimming devices, to other co-schemers in order to
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1 withdraw money from the victim-account owners' bank accounts
2 without the victim-account owners' consent, knowledge, or
3 authorization.

4 e. Defendants PETROSIAN, PARSADANYAN, CHOULDJIAN, and
5 ARAKELYAN, and others known and unknown to the Grand Jury,
6 coordinated groups of "runners" and provided the runners with
7 fraudulent debit cards so that the runners could withdraw money
8 from the victim-account owners' bank accounts without the victim-
9 account owners' consent, knowledge, or authorization.

10 f. Defendant AMIRKHANYAN and others known and unknown
11 to the Grand Jury withdrew money from the victim-account owners'
12 bank accounts without the victim-account owners' consent,
13 knowledge, or authorization.

14 g. Defendants distributed proceeds from the unlawful
15 scheme among themselves.

16 C. THE EXECUTION OF THE SCHEME

17 4. On or about the following dates, within the Central
18 District of California, and elsewhere, defendants DARBINYAN,
19 PETROSIAN, TARVERDYAN, ORTEGA, PARSADANYAN, ANTONYAN, CHOULDJIAN,
20 BAKHCHADJIAN, ANANIAN, ARAKELYAN, BALDERRAMA, and AMIRKHANYAN,
21 and others known and unknown to the Grand Jury, committed and
22 willfully caused others to commit the following acts, each of
23 which constituted an execution and attempted execution of the
24 fraudulent scheme:

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COUNT	DATE	ACT
THIRTY-EIGHT	7/17/09	Withdrawal of \$300 from Altura Credit Union account number xxxxxx-4193, in the name of victim J.D.
THIRTY-NINE	7/17/09	Withdrawal of \$300 from Altura Credit Union account number xxxxxx-4353, in the name of victim S.G.
FORTY	7/17/09	Withdrawal of \$100 from Bank of America account number xxxxxx-2441, in the name of victim M.L.
FORTY-ONE	7/17/09	Withdrawal of \$500 from Guaranty Bank account number xxxxxx-8903, in the name of victim M.J.
FORTY-TWO	7/17/09	Withdrawal of \$500 from Guaranty Bank account number xxxxxx-9996, in the name of victim R.R.
FORTY-THREE	7/17/09	Withdrawal of \$500 from Guaranty Bank account number xxxxxx-7309, in the name of victim B.T.
FORTY-FOUR	7/18/09	Withdrawal of \$300 from Altura Credit Union account number xxxxxx-4193, in the name of victim J.D.
FORTY-FIVE	7/18/09	Withdrawal of \$200 from Altura Credit Union account number xxxxxx-4353, in the name of victim S.G.
FORTY-SIX	7/18/09	Withdrawal of \$300 from Bank of America account number xxxxxx-4118, in the name of victim H.B.
FORTY-SEVEN	7/18/09	Withdrawal of \$500 from Bank of America account number xxxxxx-4118, in the name of victim H.B.
FORTY-EIGHT	7/18/09	Withdrawal of \$500 from Bank of America account number xxxxxx-2441, in the name of victim M.L.
FORTY-NINE	7/18/09	Withdrawal of \$500 from U.S. Bank account number xxxxxx-7284, in the name of victim L.D.
FIFTY	7/18/09	Withdrawal of \$300 from Guaranty Bank account number xxxxxx-8903, in the name of victim M.J.

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FIFTY-ONE	7/18/09	Withdrawal of \$200 from Guaranty Bank account number xxxxxx-8903, in the name of victim M.J.
FIFTY-TWO	7/18/09	Withdrawal of \$300 from Guaranty Bank account number xxxxxx-9996, in the name of victim R.R.
FIFTY-THREE	7/18/09	Withdrawal of \$500 from Guaranty Bank account number xxxxxx-7309, in the name of victim B.T.
FIFTY-FOUR	7/18/09	Withdrawal of \$500 from Schools First Credit Union account number xxxx-6700, in the name of victim J.A.
FIFTY-FIVE	7/18/09	Withdrawal of \$300 from Schools First Credit Union account number xxxx-8730, in the name of victim B.V.
FIFTY-SIX	7/19/09	Withdrawal of \$300 from Altura Credit Union account number xxxxxx-2862, in the name of victim H.B.
FIFTY-SEVEN	7/19/09	Withdrawal of \$300 from Altura Credit Union account number xxxxxx-4193, in the name of victim J.D.
FIFTY-EIGHT	7/19/09	Withdrawal of \$200 from Bank of America account number xxxxxx-9309, in the name of victim M.B.
FIFTY-NINE	7/19/09	Withdrawal of \$300 from Bank of America account number xxxxxx-9309, in the name of victim M.B.
SIXTY	7/19/09	Withdrawal of \$500 from Guaranty Bank account number xxxxxx-8903, in the name of victim M.J.
SIXTY-ONE	7/19/09	Withdrawal of \$500 from Guaranty Bank account number xxxxxx-6213, in the name of victim Y.O.
SIXTY-TWO	7/19/09	Withdrawal of \$300 from Guaranty Bank account number xxxxxx-9996, in the name of victim R.R.
SIXTY-THREE	7/20/09	Withdrawal of \$300 from Altura Credit Union account number xxxxxx-4353, in the name of victim S.G.
SIXTY-FOUR	7/20/09	Withdrawal of \$500 from Bank of America account number xxxxxx-9309, in the name of victim M.B.

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SIXTY-FIVE	7/20/09	Withdrawal of \$500 from Guaranty Bank account number xxxxxx-6213, in the name of victim Y.O.
SIXTY-SIX	7/23/09	Withdrawal of \$500 from U.S. Bank account number xxxxxx-719326, in the name of victim M.J.K..
SIXTY-SEVEN	8/19/09	Withdrawal of \$500 from Ventura County Credit Union account number xxxxxx-7848, in the name of victim J.L.
SIXTY-EIGHT	8/20/09	Withdrawal of \$500 from Ventura County Credit Union account number xxxxxx-5581, in the name of victim A.M.

1 same time, in violation of Title 18, United States Code, Section
2 1029(a)(3); and

3 3. To knowingly and with intent to defraud have custody
4 and control of, and possess, device-making equipment, in
5 violation of Title 18, United States Code, Section 1029(a)(4).

6 B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE
7 ACCOMPLISHED

8 The objects of the conspiracy were to be accomplished, in
9 substance, as follows:

10 1. Defendants DARBINYAN and ANTONYAN, and other co-
11 conspirators known and unknown to the Grand Jury, would obtain
12 skimming devices and distribute them to other co-conspirators,
13 including defendants TARVERDYAN, ORTEGA, BAKHCHADJIAN, ANANIAN,
14 and BALDERRAMA.

15 2. Defendants TARVERDYAN, ORTEGA, BAKHCHADJIAN, ANANIAN,
16 and BALDERRAMA, and other co-conspirators known and unknown to
17 the Grand Jury, would install the skimming devices at 99 Cents
18 Only Stores throughout Southern California, including within the
19 Central District of California.

20 3. After the skimming devices had gathered account
21 numbers and access codes belonging to victim-account owners,
22 defendants TARVERDYAN, ORTEGA, BAKHCHADJIAN, ANANIAN, and
23 BALDERRAMA, and other co-conspirators known and unknown to the
24 Grand Jury, would retrieve the skimming devices from the 99 Cents
25 Only Stores.

26 4. Defendants DARBINYAN, TARVERDYAN, PARSADANYAN, and
27 ANTONYAN, and other co-conspirators known and unknown to the
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1 Grand Jury, would distribute the victim-account numbers,
2 fraudulently obtained using the skimming devices, to other co-
3 conspirators in order to withdraw money from the victim-account
4 owners' bank accounts without the victim-account owners' consent,
5 knowledge, or authorization.

6 5. Defendants PETROSIAN, PARSADANYAN, CHOULDJIAN, and
7 ARAKELYAN, and other co-conspirators known and unknown to the
8 Grand Jury, would coordinate groups of "runners" and provide the
9 runners with fraudulent debit cards so that the runners could
10 withdraw money from the victim-account owners' bank accounts
11 without the victim-account owners' consent, knowledge, or
12 authorization.

13 6. Defendant AMIRKHANYAN, and other co-conspirators
14 known and unknown to the Grand Jury, would withdraw money from
15 the victim-account owners' bank accounts without the victim-
16 account owners' consent, knowledge, or authorization.

17 7. Defendants DARBINYAN, PETROSIAN, TARVERDYAN, ORTEGA,
18 PARSADANYAN, ANTONYAN, CHOULDJIAN, BAKHCHADJIAN, ANANIAN,
19 ARAKELYAN, BALDERRAMA, and AMIRKHANYAN, and other co-conspirators
20 known and unknown to the Grand Jury, would distribute proceeds
21 from the unlawful scheme among themselves.

22 C. OVERT ACTS

23 In furtherance of the conspiracy and to accomplish its
24 objects, defendants DARBINYAN, PETROSIAN, TARVERDYAN, ORTEGA,
25 PARSADANYAN, ANTONYAN, CHOULDJIAN, BAKHCHADJIAN, ANANIAN,
26 ARAKELYAN, BALDERRAMA, and AMIRKHANYAN, and others known and
27 unknown to the Grand Jury, committed and caused to be committed
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1 various overt acts on or about the following dates, within the
2 Central District of California, and elsewhere, including, but not
3 limited to, the following:

4 1. On or about July 6, 2009, defendant DARBINYAN, in a
5 telephone conversation using coded language, discussed with
6 defendant TARVERDYAN their plan to install skimming devices at 99
7 Cents Only Stores.

8 2. On or about July 6, 2009, defendants TARVERDYAN and
9 BAKHCHADJIAN entered a 99 Cents Only Store in Whittier,
10 California, to install a skimming device.

11 3. On or about July 13, 2009, defendant DARBINYAN, in a
12 telephone conversation using coded language, told defendants
13 PETROSIAN and CHOULDJIAN that a co-conspirator was going to
14 deliver victim-account information the following day or Friday.

15 4. On or about July 14, 2009, defendants TARVERDYAN and
16 BAKHCHADJIAN retrieved skimming devices from three different 99
17 Cents Only Stores in Riverside, California.

18 5. On or about July 16, 2009, defendant DARBINYAN, in a
19 telephone conversation using coded language, told defendant
20 PETROSIAN that DARBINYAN had fraudulently obtained debit card
21 account numbers and needed four "runners" the following day to
22 withdraw money using the fraudulently obtained debit card account
23 numbers.

24 6. On or about July 16, 2009, defendant DARBINYAN, in a
25 telephone conversation using coded language, told defendant
26 ARAKELYAN that DARBINYAN needed four "runners" the following day
27 to withdraw money using the fraudulently obtained debit card
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1 account numbers.

2 7. On or about July 16, 2009, defendant TARVERDYAN, in a
3 telephone conversation using coded language, asked defendant
4 DARBINYAN if DARBINYAN would be using "runners" to withdraw money
5 using the fraudulently obtained debit card account numbers the
6 following day, and DARBINYAN responded affirmatively.

7 8. On or about July 16, 2009, defendant DARBINYAN, in a
8 telephone conversation using coded language, told defendant
9 CHOULDJIAN that DARBINYAN needed four to five "runners" the
10 following day to withdraw money and that he had approximately 400
11 fraudulently obtained account numbers, and CHOULDJIAN said that
12 the runners would withdraw the money from ATMs.

13 9. On or about July 17, 2009, defendant DARBINYAN, in a
14 telephone conversation using coded language, discussed with
15 defendant TARVERDYAN having "runners" withdraw money that day.

16 10. On or about July 17, 2009, defendant TARVERDYAN, in a
17 telephone conversation using coded language, told defendant
18 DARBINYAN that he had fraudulently obtained account numbers from
19 Wells Fargo Bank, and TARVERDYAN asked DARBINYAN if he was ready
20 for a second set of fraudulently obtained account numbers to
21 provide to the "runners."

22 11. On or about July 17, 2009, defendants DARBINYAN and
23 ARAKELYAN, in a telephone conversation using coded language,
24 discussed the status of their efforts to withdraw money using the
25 fraudulently obtained account numbers.

26 12. On or about July 17, 2009, defendants DARBINYAN and
27 TARVERDYAN, in a telephone conversation using coded language,

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1 discussed having "runners" withdraw funds before and after
2 midnight to avoid bank ATM withdrawal limits.

3 13. On or about July 17, 2009, defendant AMIRKHANYAN
4 withdrew approximately \$500 from a Guaranty Bank account in the
5 name of victim B.T.

6 14. On or about July 18, 2009, defendants DARBINYAN and
7 PARSADANYAN, in a telephone conversation using coded language,
8 discussed how the "runners" had withdrawn funds before and after
9 midnight to avoid bank ATM withdrawal limits, and PARSADANYAN
10 said there were some fraudulent debit cards left over.

11 15. On or about July 18, 2009, defendant PETROSIAN, in a
12 telephone conversation using coded language, told defendant
13 DARBINYAN that the "runners" were all there and working that day.

14 16. On or about July 18, 2009, defendant CHOOLDJIAN, in a
15 telephone conversation using coded language, told defendant
16 DARBINYAN that the "runners" had withdrawn approximately \$14,500,
17 and that there were still more fraudulently obtained account
18 numbers to be used.

19 17. On or about July 18, 2009, defendant DARBINYAN, in a
20 telephone conversation using coded language, discussed with
21 defendant TARVERDYAN distributing proceeds from the fraudulent
22 bank withdrawals, and DARBINYAN told TARVERDYAN that he was going
23 to send PARSADANYAN to deliver approximately \$30,000 to
24 TARVERDYAN because DARBINYAN did not want to drive with it.

25 18. On or about July 18, 2009, defendant PARSADANYAN
26 possessed approximately \$30,000 in criminal proceeds inside a
27 shoe box.

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1 19. On or about July 18, 2009, defendant DARBINYAN, in a
2 telephone conversation using coded language, discussed with
3 defendant TARVERDYAN sending co-conspirators to withdraw money
4 using fraudulent debit cards.

5 20. On or about July 18, 2009, defendant AMIRKHANYAN
6 withdrew approximately \$300 from a Guaranty Bank account in the
7 name of victim R.R.

8 21. On or about July 20, 2009, defendant TARVERDYAN and
9 an unidentified co-conspirator entered a 99 Cents Only Store in
10 Riverside, California, to examine a debit/credit card keypad.

11 22. On or about July 20, 2009, defendants DARBINYAN and
12 PETROSIAN, in a telephone conversation using coded language,
13 discussed what percentage of the fraudulently obtained money
14 should be paid to the "runners."

15 23. On or about July 21, 2009, defendants DARBINYAN and
16 TARVERDYAN, in a telephone conversation using coded language,
17 discussed installing skimming devices at 99 Cents Only Stores.

18 24. On or about July 21, 2009, defendant TARVERDYAN, in a
19 telephone conversation using coded language, told defendant
20 DARBINYAN that employees of 99 Cents Only Stores may have
21 discovered some of the skimming devices that they had installed
22 at debit/credit card terminals.

23 25. On or about July 22, 2009, defendants BAKHCHADJIAN
24 and ANANIAN entered a 99 Cents Only Store in Riverside,
25 California, to examine a debit/credit card keypad.

26 26. On or about August 8, 2009, defendants DARBINYAN and
27 PARSADANYAN, in a telephone conversation using coded language,
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1 discussed installing skimming devices.

2 27. On or about August 8, 2009, defendants DARBINYAN and
3 TARVERDYAN, in a telephone conversation using coded language,
4 discussed installing skimming devices that day.

5 28. On or about August 8, 2009, defendants BAKHCHADJIAN
6 and ANANIAN, and other unindicted co-conspirators, installed a
7 skimming device at a 99 Cents Only Store in Ventura, California.

8 29. On or about August 8, 2009, unindicted co-
9 conspirators installed a skimming device at a 99 Cents Only Store
10 in North Hollywood, California.

11 30. On or about August 9, 2009, defendants DARBINYAN and
12 PARSADANYAN, in a telephone conversation using coded language,
13 discussed the installation of skimming devices at 99 Cents Only
14 Stores the day before, and PARSADANYAN said that fraudulently
15 obtained account numbers should arrive soon.

16 31. On or about August 9, 2009, defendant DARBINYAN, in a
17 telephone conversation using coded language, told defendant
18 CHOULDJIAN that the fraudulently obtained account numbers were
19 ready, and both defendants discussed getting "runners."

20 32. On or about August 13, 2009, defendant DARBINYAN, in
21 a telephone conversation using coded language, told defendant
22 Artur Pembejian that defendant BAKHCHADJIAN would be installing
23 skimming devices soon.

24 33. On or about August 14, 2009, defendants BAKHCHADJIAN
25 and ANANIAN installed skimming devices at two 99 Cents Only
26 Stores in Huntington Beach, California.

1 34. On or about August 14, 2009, defendant ANTONYAN, in a
2 telephone conversation using coded language, told defendant
3 DARBINYAN that ANTONYAN was in the San Diego, California area
4 with others, and that they had skimming devices.

5 35. On or about August 13 and August 14, 2009, unindicted
6 co-conspirators installed skimming devices at 99 Cents Only
7 Stores in San Diego, California.

8 36. On or about August 14, 2009, defendant ANTONYAN, in a
9 telephone conversation using coded language, told defendant
10 DARBINYAN that they had successfully installed skimming devices
11 at 99 Cents Only Stores in San Diego, California.

12 37. On or about August 24, 2009, defendant ANTONYAN, in a
13 telephone conversation using coded language, told defendant
14 DARBINYAN that ANTONYAN and other unindicted co-conspirators
15 would soon be picking up skimming devices from 99 Cents Only
16 Stores.

17 38. On or about August 24, 2009, defendants BAKHCHADJIAN
18 and ANANIAN, and other unindicted co-conspirators, attempted to
19 retrieve a skimming device from a 99 Cents Only Store in
20 Huntington Beach, California.

21 39. On or about August 24, 2009, defendants BAKHCHADJIAN
22 and ANANIAN possessed skimming devices, each containing
23 approximately 524 and 348 victim records, respectively.

24 40. On or about August 26, 2009, defendant DARBINYAN, in
25 a telephone conversation using coded language, discussed with
26 defendant ANTONYAN picking up a skimming device from ANTONYAN.
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1 41. On or about August 27, 2009, defendant DARBINYAN, in
2 a telephone conversation using coded language, told defendant
3 PARSADANYAN that he was on his way to San Diego, California, to
4 meet with defendant ORTEGA.

5 42. On or about August 27, 2009, defendants ORTEGA and
6 BALDERRAMA, and other unindicted co-conspirators, retrieved
7 skimming devices from two 99 Cents Only Stores in San Diego,
8 California.

9 43. On or about August 27, 2009, defendants DARBINYAN and
10 PARSADANYAN, in a telephone conversation using coded language,
11 discussed proceeds from the skimming device scheme targeting 99
12 Cents Only Stores.

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COUNT SEVENTY

[18 U.S.C. §§ 1029(a)(4), 2]

On or about August 24, 2009, in Los Angeles County, within the Central District of California, and elsewhere, defendants ANDRANIK BAKHCHADJIAN, also known as ("aka") "Ando," aka "Andranik Bakhcadjian," and VARTENIE ANANIAN, together with others known and unknown to the Grand Jury, knowingly and with intent to defraud had custody and control of, possessed, and aided and abetted the custody, control, and possession of, device-making equipment, as defined in Title 18, United States Code, Section 1029(e)(6), namely, a credit and debit card skimming device, with said custody, control, and possession affecting interstate and foreign commerce.

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COUNT	DATE	DEFENDANT(S)	MEANS OF IDENTIFICATION
SEVENTY-ONE	7/17/09	MHER DARBINYAN, also known as ("aka") "Mike," aka "Hollywood Mike," aka "Little Mike," aka "Capone," aka "Caps," aka "Maher" ("DARBINYAN"); ARAM PETROSIAN, aka "Tot," aka "Toto" ("PETROSIAN"); RAYMOND TARVERDYAN, aka "Rye," aka "Ray" ("TARVERDYAN"); GUSTAVO ORTEGA, aka "Bam Bam," aka "Bams," aka "Gus" ("ORTEGA"); RAFAEL PARSADANYAN, aka "Raffi," aka "Raffo" ("PARSADANYAN"); SIMON ANTONYAN, aka "Simo," aka "Sim" ("ANTONYAN"); GAREN CHOULDJIAN, aka "Misak" ("CHOULDJIAN"); ANDRANIK BAKHCHADJIAN, aka "Ando" aka "Andranik Bakhcadjian" ("BAKHCHADJIAN"); VARTENIE ANANIAN ("ANANIAN"); KHACHATUR ARAKELYAN, aka "Khecho" ("ARAKELYAN")	Account Number, Altura Credit Union account number xxxxxx-4193, and Personal Identification Number ("PIN") of victim J.D.

COUNT	DATE	DEFENDANT(S)	MEANS OF IDENTIFICATION
SEVENTY-TWO	7/17/09	DARBINYAN; PETROSIAN; TARVERDYAN; ORTEGA; PARSADANYAN; ANTONYAN; CHOULDJIAN; BAKHCHADJIAN; ANANIAN; ARAKELIAN	Account Number, Altura Credit Union account number xxxxxx-4353, and PIN of victim S.G.
SEVENTY-THREE	7/17/09	DARBINYAN; PETROSIAN; TARVERDYAN; ORTEGA; PARSADANYAN; ANTONYAN; CHOULDJIAN; BAKHCHADJIAN; ANANIAN; ARAKELIAN	Account Number, Guaranty Bank account number xxxxxx-8903, and PIN of victim M.J.
SEVENTY-FOUR	7/17/09	DARBINYAN; PETROSIAN; TARVERDYAN; ORTEGA; PARSADANYAN; ANTONYAN; CHOULDJIAN; BAKHCHADJIAN; ANANIAN; ARAKELIAN	Account Number, Guaranty Bank account number xxxxxx-9996, and PIN of victim R.R.
SEVENTY-FIVE	7/17/09	DARBINYAN; PETROSIAN; TARVERDYAN; ORTEGA; PARSADANYAN; ANTONYAN; CHOULDJIAN; BAKHCHADJIAN; ANANIAN; ARAKELIAN; VARDAN AMIRKHANYAN ("AMIRKHANYAN")	Account Number, Guaranty Bank account number xxxxxx-7309, and PIN of victim B.T.

COUNT	DATE	DEFENDANT(S)	MEANS OF IDENTIFICATION
SEVENTY-SIX	7/18/09	DARBINYAN; PETROSIAN; TARVERDYAN; ORTEGA; PARSADANYAN; ANTONYAN; CHOULDJIAN; BAKHCHADJIAN; ANANIAN; ARAKELIAN	Account Number, Bank of America account number xxxxxx-4118, and PIN of victim H.B.
SEVENTY-SEVEN	7/18/09	DARBINYAN; PETROSIAN; TARVERDYAN; ORTEGA; PARSADANYAN; ANTONYAN; CHOULDJIAN; BAKHCHADJIAN; ANANIAN; ARAKELIAN	Account Number, Altura Credit Union account number xxxxxx-4193, and PIN of victim J.D.
SEVENTY-EIGHT	7/18/09	DARBINYAN; PETROSIAN; TARVERDYAN; ORTEGA; PARSADANYAN; ANTONYAN; CHOULDJIAN; BAKHCHADJIAN; ANANIAN; ARAKELIAN	Account Number, U.S. Bank account number xxxxxx-7284, and PIN of victim L.D.
SEVENTY-NINE	7/18/09	DARBINYAN; PETROSIAN; TARVERDYAN; ORTEGA; PARSADANYAN; ANTONYAN; CHOULDJIAN; BAKHCHADJIAN; ANANIAN; ARAKELIAN	Account Number, Altura Credit Union account number xxxxxx-4353, and PIN of victim S.G.

COUNT	DATE	DEFENDANT(S)	MEANS OF IDENTIFICATION
EIGHTY	7/18/09	DARBINYAN; PETROSIAN; TARVERDYAN; ORTEGA; PARSADANYAN; ANTONYAN; CHOULDJIAN; BAKHCHADJIAN; ANANIAN; ARAKELIAN	Account Number, Guaranty Bank account number xxxxxx-8903, and PIN of victim M.J.
EIGHTY- ONE	7/18/09	DARBINYAN; PETROSIAN; TARVERDYAN; ORTEGA; PARSADANYAN; ANTONYAN; CHOULDJIAN; BAKHCHADJIAN; ANANIAN; ARAKELIAN	Account Number, Bank of America account number xxxxxx-4441, and PIN of victim M.L.
EIGHTY- TWO	7/18/09	DARBINYAN; PETROSIAN; TARVERDYAN; ORTEGA; PARSADANYAN; ANTONYAN; CHOULDJIAN; BAKHCHADJIAN; ANANIAN; ARAKELIAN; AMIRKHANYAN	Account Number, Guaranty Bank account number xxxxxx-9996, and PIN of victim R.R.
EIGHTY- THREE	7/18/09	DARBINYAN; PETROSIAN; TARVERDYAN; ORTEGA; PARSADANYAN; ANTONYAN; CHOULDJIAN; BAKHCHADJIAN; ANANIAN; ARAKELIAN	Account Number, Guaranty Bank account number xxxxxx-7309, and PIN of victim B.T.

COUNT	DATE	DEFENDANT (S)	MEANS OF IDENTIFICATION
EIGHTY-FOUR	7/18/09	DARBINYAN; PETROSIAN; TARVERDYAN; ORTEGA; PARSADANYAN; ANTONYAN; CHOULDJIAN; BAKHCHADJIAN; ANANIAN; ARAKELIAN	Account Number, Schools First Credit Union account number xxxx-6700, and PIN of victim J.A.
EIGHTY-FIVE	7/18/09	DARBINYAN; PETROSIAN; TARVERDYAN; ORTEGA; PARSADANYAN; ANTONYAN; CHOULDJIAN; BAKHCHADJIAN; ANANIAN; ARAKELIAN	Account Number, Schools First Credit Union account number xxxx-8730, and PIN of victim B.V.
EIGHTY-SIX	7/19/09	DARBINYAN; PETROSIAN; TARVERDYAN; ORTEGA; PARSADANYAN; ANTONYAN; CHOULDJIAN; BAKHCHADJIAN; ANANIAN; ARAKELIAN	Account Number, Bank of America account number xxxxxx-9309, and PIN of victim M.B.
EIGHTY-SEVEN	7/19/09	DARBINYAN; PETROSIAN; TARVERDYAN; ORTEGA; PARSADANYAN; ANTONYAN; CHOULDJIAN; BAKHCHADJIAN; ANANIAN; ARAKELIAN	Account Number, Guaranty Bank account number xxxxxx-8903, and PIN of victim M.J.

COUNT	DATE	DEFENDANT (S)	MEANS OF IDENTIFICATION
EIGHTY-EIGHT	7/19/09	DARBINYAN; PETROSIAN; TARVERDYAN; ORTEGA; PARSADANYAN; ANTONYAN; CHOULDJIAN; BAKHCHADJIAN; ANANIAN; ARAKELIAN	Account Number, Guaranty Bank account number xxxxxx-6213, and PIN of victim Y.O.
EIGHTY-NINE	7/19/09	DARBINYAN; PETROSIAN; TARVERDYAN; ORTEGA; PARSADANYAN; ANTONYAN; CHOULDJIAN; BAKHCHADJIAN; ANANIAN; ARAKELIAN	Account Number, Guaranty Bank account number xxxxxx-9996, and PIN of victim R.R.
NINETY	7/20/09	DARBINYAN; PETROSIAN; TARVERDYAN; ORTEGA; PARSADANYAN; ANTONYAN; CHOULDJIAN; BAKHCHADJIAN; ANANIAN; ARAKELIAN	Account Number, Bank of America account number xxxxxx-9309, and PIN of victim M.B.
NINETY-ONE	7/20/09	DARBINYAN; PETROSIAN; TARVERDYAN; ORTEGA; PARSADANYAN; ANTONYAN; CHOULDJIAN; BAKHCHADJIAN; ANANIAN; ARAKELIAN	Account Number, Altura Credit Union account number xxxxxx-4353, and PIN of victim S.G.

COUNT	DATE	DEFENDANT(S)	MEANS OF IDENTIFICATION
NINETY-TWO	7/20/09	DARBINYAN; PETROSIAN; TARVERDYAN; ORTEGA; PARSADANYAN; ANTONYAN; CHOULDJIAN; BAKHCHADJIAN; ANANIAN; ARAKELIAN	Account Number, Guaranty Bank account number xxxxxx-6213, and PIN of victim Y.O.
NINETY-THREE	7/23/09	DARBINYAN; PETROSIAN; TARVERDYAN; ORTEGA; PARSADANYAN; ANTONYAN; CHOULDJIAN; BAKHCHADJIAN; ANANIAN; ARAKELIAN	Account Number, U.S. Bank account number xxxxxx-719326, and PIN of victim M.J.K.
NINETY-FOUR	8/19/09	DARBINYAN; PETROSIAN; TARVERDYAN; ORTEGA; PARSADANYAN; ANTONYAN; CHOULDJIAN; BAKHCHADJIAN; ANANIAN; ARAKELIAN	Account Number, Ventura County Credit Union account number xxxxxxx-7848, and PIN of victim J.L.
NINETY-FIVE	8/20/09	DARBINYAN; PETROSIAN; TARVERDYAN; ORTEGA; PARSADANYAN; ANTONYAN; CHOULDJIAN; BAKHCHADJIAN; ANANIAN; ARAKELIAN	Account Number, Ventura County Credit Union account number xxxxxxx-5581, and PIN of victim A.M.

1 addresses, social security numbers, dates of birth, and other
2 personal identifying information, without the individuals'
3 knowledge, consent, or authorization.

4 b. Defendants BILEZIKCHYAN, K. YERKANYAN, and ALOYAN,
5 and other co-schemers, obtained bank account information
6 belonging to third-party individuals, including their account
7 names, the names of account owners, the account owners' personal
8 identifying information, and account values, without these
9 individuals' knowledge, consent, or authorization.

10 c. Defendants BILEZIKCHYAN, K. YERKANYAN, and ALOYAN,
11 and other co-schemers, provided the third-party personal
12 identifying information and third-party bank account information
13 to other co-schemers to obtain money, open fraudulent bank
14 accounts, obtain bank loans, and obtain lines of credit, without
15 the knowledge, consent, or authorization of these third-party
16 individuals.

17 C. THE EXECUTION OF THE SCHEME

18 4. On or about the following dates, within the Central
19 District of California, and elsewhere, defendants BILEZIKCHYAN,
20 K. YERKANYAN, and ALOYAN, and others known and unknown to the
21 Grand Jury, committed and willfully caused others to commit the
22 following acts, each of which constituted an execution and
23 attempted execution of the fraudulent scheme:

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COUNT	DATE	ACT
NINETY-SIX	11/11/09	Applied for bank account with HSBC Bank in the name of victim E.J. using personal identifying information for victim E.J.
NINETY-SEVEN	11/21/09	Possessed personal identifying information belonging to victim J.S.
NINETY-EIGHT	3/10/10	Distributed bank account information belonging to victim S.T. and Bank of America account number xxxxx-61642

1 COUNTS NINETY-NINE THROUGH ONE HUNDRED AND ONE

2 [18 U.S.C. §§ 1028A(a) (1), 2]

3 On or about the dates specified below, in Los Angeles and
 4 Orange Counties, within the Central District of California, and
 5 elsewhere, the defendants named below, while aiding and abetting
 6 each other, and together with others known and unknown to the
 7 Grand Jury, knowingly transferred, possessed, and used, and
 8 willfully caused to be transferred, possessed, and used, without
 9 lawful authority, a means of identification of another person, as
 10 specified below, during and in relation to Bank Fraud, a felony
 11 violation of Title 18, United States Code, Section 1344, as
 12 charged in Counts Ninety-Six through Ninety-Eight of this
 13 Indictment:

COUNT	DATE	DEFENDANT(S)	MEANS OF IDENTIFICATION
NINETY-NINE	11/11/09	PARAMAZ BILEZIKCHYAN, aka "Parik," aka "P," aka "Parnamas Bileziktsian," aka "Bleziktsian Paramas" ("BILEZIKCHYAN"); KARO YERKANYAN, aka "Guilty," aka "Gator," aka "Kane" ("YERKANYAN")	Name, Social Security Number, and Date of Birth of victim E.J.
ONE HUNDRED	11/21/09	BILEZIKCHYAN; YERKANYAN	Name, Social Security Number, and Date of Birth of victim J.S.
ONE HUNDRED AND ONE	3/10/10	BILEZIKCHYAN; ANDRANIK ALOYAN, aka "Andy," aka "Ando"	Name, Bank Account Number, and Date of Birth of victim S.T.

COUNT ONE HUNDRED AND TWO

[18 U.S.C. § 1028(a)(7)]

On or about November 21, 2009, in Los Angeles and Riverside Counties, within the Central District of California, and elsewhere, defendants PARAMAZ BILEZIKCHYAN, also known as ("aka") "Parik," aka "P," aka "Parnamas Bileziktsian," aka "Bleziktsian Paramas," and KARO YERKANYAN, aka "Guilty," aka "Gator," aka "Kane," together with others known and unknown to the Grand Jury, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, as defined in Title 18, United States Code, Section 1028(d)(7), with the intent to commit, to aid and abet, and in connection with, unlawful activity constituting a violation of Federal law and a felony under any applicable State and local law, including, but not limited to, Bank Fraud, in violation of Title 18, United States Code, Section 1344, and Access Device Fraud, in violation of Title 18, United States Code, Section 1029, with said transfer, possession, and use affecting interstate and foreign commerce.

COUNT ONE HUNDRED AND THREE

[18 U.S.C. § 371]

A. OBJECTS OF THE CONSPIRACY

Beginning on a date unknown to the Grand Jury, and continuing to on or about January 26, 2011, in Los Angeles County, within the Central District of California, and elsewhere, defendants HAYK KARAYAN, also known as ("aka") "Hayko," aka "Whisper" ("H. KARAYAN"), ARMAN KARAYAN ("A. KARAYAN"), RAYMOND TARVERDYAN, aka "Rye," aka "Ray" ("TARVERDYAN"), GAGIK ZHAMKOCHYAN, aka "Manic," aka "Panther," aka "Gago," aka "Gag" ("ZHAMKOCHYAN"), KARAPET JOEY KARAMUSYAN, aka "Karo" ("KARAMUSYAN"), HAROUTIOUN ARTHUR MELKONIAN, aka "Art," aka "Art from Montebello" ("MELKONIAN"), and ARSEN AYRANJIAN ("AYRANJIAN"), together with others known and unknown to the Grand Jury, conspired and agreed with each other to commit the following offenses against the United States:

1. To knowingly possess with intent to use and transfer unlawfully five or more identification documents and false identification documents, in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 1028(a)(3);

2. To knowingly transfer, possess, and use without lawful authority a means of identification of another person with the intent to commit, to aid and abet, and in connection with, unlawful activity constituting a violation of Federal law and applicable State and local law, in and affecting interstate and

1 foreign commerce, in violation of Title 18, United States Code,
2 Section 1028(a)(7);

3 3. To commit aggravated identity theft, in violation of
4 Title 18, United States Code, Section 1028A(a)(1);

5 4. To knowingly and with intent to defraud possess fifteen
6 or more counterfeit and unauthorized access devices, in violation
7 of Title 18, United States Code, Section 1029(a)(3); and

8 5. To knowingly and with the intent to defraud produce,
9 traffic in, have custody and control of, and possess device-
10 making equipment, in violation of Title 18, United States Code,
11 Section 1029(a)(4).

12 B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE
13 ACCOMPLISHED

14 The objects of the conspiracy were to be accomplished, in
15 substance, as follows:

16 1. Defendants H. KARAYAN, A. KARAYAN, TARVERDYAN,
17 ZHAMKOCHYAN, KARAMUSYAN, and MELKONIAN would identify individuals
18 whose identities could be utilized for fraudulent purposes.

19 2. Defendants H. KARAYAN, A. KARAYAN, and AYRANJIAN would
20 rent an office space in which to possess fraudulent
21 identification documents and means of identification.

22 3. Defendants H. KARAYAN, A. KARAYAN, TARVERDYAN,
23 ZHAMKOCHYAN, KARAMUSYAN, and MELKONIAN would possess various
24 means of identification of other persons, fraudulent access
25 devices, and device-making equipment for use in committing
26 identity theft and access device fraud.

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1 4. Defendants H. KARAYAN and AYRANJIAN, when questioned by
2 law enforcement about their activities at the rented office
3 space, would lie to law enforcement about the true nature of
4 their business in order to conceal and further the conspiracy to
5 commit identity theft and access device fraud.

6 C. OVERT ACTS

7 In furtherance of the conspiracy and to accomplish the
8 objects of the conspiracy, defendants H. KARAYAN, A. KARAYAN,
9 TARVERDYAN, ZHAMKOCHYAN, KARAMUSYAN, MELKONIAN, and AYRANJIAN,
10 and others known and unknown to the Grand Jury, committed and
11 caused to be committed various overt acts on or about the
12 following dates, within the Central District of California, and
13 elsewhere, including, but not limited to, the following:

14 1. On or about January 16, 2010, defendants H. KARAYAN
15 and TARVERDYAN, in a telephone conversation using coded language,
16 discussed the need to get their fraudulent operation started so
17 that they could make some money.

18 2. On or about January 21, 2010, defendants H. KARAYAN
19 and TARVERDYAN, in a telephone conversation using coded language,
20 discussed how they had six individuals ready to work on their
21 fraudulent business and discussed the need to rent office space.

22 3. On or about January 22, 2010, defendant H. KARAYAN,
23 in a telephone conversation using coded language, told an
24 unindicted co-conspirator that defendants TARVERDYAN, KARAMUSYAN,
25 and MELKONIAN had put in money for their business.

26 4. On or about January 22, 2010, defendants H. KARAYAN
27 and A. KARAYAN, in a telephone conversation using coded language,
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1 discussed how H. KARAYAN and defendant ZHAMKOCHYAN had found a
2 location for their fraudulent business.

3 5. On or about January 25, 2010, defendant AYRANJIAN
4 signed a two-year lease for space at 13847 Saticoy Street in
5 North Hollywood, California ("Saticoy"), stating that the
6 property would be used only for a food pickling company and
7 related storage.

8 6. On or about January 25, 2010, defendant A. KARAYAN
9 issued a cashier's check for \$7,750 to DRZ Partners to lease
10 office space at Saticoy.

11 7. On or about January 25, 2010, defendants H. KARAYAN
12 and ZHAMKOCHYAN, in a telephone conversation using coded
13 language, discussed how they would use the space at Saticoy for
14 their fraudulent business, and H. KARAYAN instructed ZHAMKOCHYAN
15 to contact defendants A. KARAYAN and KARAMUSYAN regarding
16 activities at Saticoy.

17 8. On or about January 25, 2010, defendants H. KARAYAN
18 and A. KARAYAN, in a telephone conversation using coded language,
19 discussed the lease for the office space at Saticoy.

20 9. On or about January 25, 2010, defendant H. KARAYAN,
21 in a telephone conversation using coded language, discussed with
22 defendant A. KARAYAN moving furniture into the office space at
23 Saticoy and told A. KARAYAN to instruct defendants KARAMUSYAN and
24 AYRANJIAN to obtain insurance for the fraudulent business at
25 Saticoy.

26 10. On or about January 25, 2010, defendants H. KARAYAN
27 and KARAMUSYAN, in a telephone conversation using coded language,
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1 discussed individuals whom they could pay in exchange for use of
2 their identities in fraudulent activity.

3 11. On or about January 26, 2010, defendants H. KARAYAN
4 and ZHAMKOCHYAN, in a telephone conversation using coded
5 language, discussed individuals whom they could pay in exchange
6 for use of their identities in fraudulent activity.

7 12. On or about January 26, 2010, defendants H. KARAYAN
8 and TARVERDYAN, in a telephone conversation using coded language,
9 discussed moving into the office space at Saticoy, and H. KARAYAN
10 said he would contact defendant KARAMUSYAN.

11 13. On or about January 27, 2010, defendants H. KARAYAN
12 and ZHAMKOCHYAN, in a telephone conversation using coded
13 language, discussed moving into the office space at Saticoy and
14 that defendants KARAMUSYAN and MELKONIAN would also be there.

15 14. On or about January 27, 2010, defendants H. KARAYAN,
16 A. KARAYAN, TARVERDYAN, ZHAMKOCHYAN, KARAMUSYAN, and MELKONIAN
17 went to the office at Saticoy.

18 15. On or about January 28, 2010, defendants H. KARAYAN
19 and ZHAMKOCHYAN went to the office at Saticoy.

20 16. On or about February 1, 2010, defendant TARVERDYAN,
21 in a telephone conversation using coded language, asked defendant
22 H. KARAYAN when they should go to the office at Saticoy and make
23 some money.

24 17. On or about February 2, 2010, defendant H. KARAYAN,
25 in a telephone conversation using coded language, told defendant
26 ZHAMKOCHYAN that defendants A. KARAYAN, TARVERDYAN, and MELKONIAN
27 were at Saticoy.

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1 18. On or about February 3, 2010, defendant H. KARAYAN
2 went to the office at Saticoy.

3 19. On or about February 10, 2010, defendants H. KARAYAN,
4 A. KARAYAN, TARVERDYAN, ZHAMKOCHYAN, KARAMUSYAN, and MELKONIAN
5 possessed pre-paid telephone cards, marked with their names, for
6 their use in connection with the fraudulent business at Saticoy.

7 20. On or about February 10, 2010, defendants H. KARAYAN,
8 A. KARAYAN, TARVERDYAN, ZHAMKOCHYAN, KARAMUSYAN, and MELKONIAN
9 possessed rubber fingerprint covers to prevent their fingerprints
10 from appearing on the documents and items inside Saticoy.

11 21. On or about February 10, 2010, defendants H. KARAYAN,
12 A. KARAYAN, TARVERDYAN, ZHAMKOCHYAN, KARAMUSYAN, and MELKONIAN
13 possessed a "reader-writer" device used to re-encode the magnetic
14 strip of access devices, such as credit and debit cards, and
15 possessed a "skimming device" used to collect means of
16 identification, including account numbers, from gas station
17 pumps.

18 22. On or about February 10, 2010, defendant H. KARAYAN
19 made false and misleading statements and representations to law
20 enforcement and claimed that he had never been to Saticoy, did
21 not lease or own space at Saticoy, and did not operate a
22 financial fraud business at Saticoy.

23 23. On or about August 24, 2010, defendant AYRANJIAN made
24 false and misleading statements and representations to law
25 enforcement about his involvement with the operation of Saticoy
26 and told law enforcement that when he signed the lease for the
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1 office space at Saticoy, he intended for that space to be used as
2 an import-export business for canned foods.

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COUNT ONE HUNDRED AND FOUR

[18 U.S.C. § 1028(a)(3)]

On or about February 10, 2010, in Los Angeles County, within the Central District of California, and elsewhere, defendants HAYK KARAYAN, also known as ("aka") "Hayko," aka "Whisper," ARMAN KARAYAN, RAYMOND TARVERDYAN, aka "Rye," aka "Ray," GAGIK ZHAMKOCHYAN, aka "Manic," aka "Panther," aka "Gago," aka "Gag," KARAPET JOEY KARAMUSYAN, aka "Karo," and HAROUTIOUN ARTHUR MELKONIAN, aka "Art," aka "Art from Montebello," knowingly possessed with intent to unlawfully use and transfer five or more identification documents and false identification documents, all of which were issued and appeared to have been issued by and under the authority of the State of California and the United States, including California Drivers Licenses, Social Security Cards, and Employment Authorization Cards, with said possession and transfer affecting interstate and foreign commerce.

COUNT ONE HUNDRED AND FIVE

[18 U.S.C. § 1029(a)(3)]

On or about February 10, 2010, in Los Angeles County, within the Central District of California, and elsewhere, defendants HAYK KARAYAN, also known as ("aka") "Hayko," aka "Whisper," ARMAN KARAYAN, RAYMOND TARVERDYAN, aka "Rye," aka "Ray," GAGIK ZHAMKOCHYAN, aka "Manic," aka "Panther," aka "Gago," aka "Gag," KARAPET JOEY KARAMUSYAN, aka "Karo," and HAROUTIOUN ARTHUR MELKONIAN, aka "Art," aka "Art from Montebello," knowingly and with intent to defraud possessed fifteen or more unauthorized and counterfeit access devices, as defined in Title 18, United States Code, Sections 1029(e)(1), (2), and (3), with said possession affecting interstate and foreign commerce.

COUNT ONE HUNDRED AND SIX

[18 U.S.C. §§ 1029(a)(4), 2]

On or about February 10, 2010, in Los Angeles County, within the Central District of California, and elsewhere, defendants HAYK KARAYAN, also known as ("aka") "Hayko," aka "Whisper," ARMAN KARAYAN, RAYMOND TARVERDYAN, aka "Rye," aka "Ray," GAGIK ZHAMKOCHYAN, aka "Manic," aka "Panther," aka "Gago," aka "Gag," KARAPET JOEY KARAMUSYAN, aka "Karo," and HAROUTIOUN ARTHUR MELKONIAN, aka "Art," aka "Art from Montebello," while aiding and abetting each other, and together with others known and unknown to the Grand Jury, knowingly and with intent to defraud had custody and control of and possessed, and willfully caused others to have custody and control of and possess, device-making equipment, as defined in Title 18, United States Code, Section 1029(e)(6), with said custody, control, and possession affecting interstate and foreign commerce.

1 COUNTS ONE HUNDRED AND SEVEN THROUGH ONE HUNDRED AND TEN

2 [18 U.S.C. §§ 1028A(a)(1), 2]

3 On or about February 10, 2010, in Los Angeles County, within
4 the Central District of California, and elsewhere, defendants
5 HAYK KARAYAN, also known as ("aka") "Hayko," aka "Whisper," ARMAN
6 KARAYAN, RAYMOND TARVERDYAN, aka "Rye," aka "Ray," GAGIK
7 ZHAMKOCHYAN, aka "Manic," aka "Panther," aka "Gago," aka "Gag,"
8 KARAPET JOEY KARAMUSYAN, aka "Karo," and HAROUTIOUN ARTHUR
9 MELKONIAN, aka "Art," aka "Art from Montebello," while aiding and
10 abetting each other, and together with others known and unknown
11 to the Grand Jury, knowingly transferred, possessed, and used,
12 and willfully caused to be transferred, possessed, and used,
13 without lawful authority, a means of identification of another
14 person, as specified below, during and in relation to:

15 (1) Identity Theft, a felony violation of Title 18, United States
16 Code, Section 1028(a)(3), as charged in Count One Hundred and
17 Four of this Indictment; and (2) Access Device Fraud, a felony
18 violation of Title 18, United States Code, Section 1029(a), as
19 charged in Counts One Hundred and Five and One Hundred and Six of
20 this Indictment:

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COUNT	MEANS OF IDENTIFICATION
ONE HUNDRED AND SEVEN	Name, Social Security Number, Date of Birth, Bank Account Numbers, and Driver's License Number belonging to victim M.S.
ONE HUNDRED AND EIGHT	Name, Social Security Number, Date of Birth, and Bank Account Numbers belonging to victim D.C.
ONE HUNDRED AND NINE	Name, Social Security Number, Date of Birth, Bank Account Numbers, and Driver's License Number belonging to victim C.B.
ONE HUNDRED AND TEN	Name, Social Security Number, Date of Birth, and Bank Account Numbers belonging to victim S.F.

COUNT ONE HUNDRED AND ELEVEN

[18 U.S.C. § 1028(a)(7)]

On or about February 10, 2010, in Los Angeles County, within the Central District of California, and elsewhere, defendants HAYK KARAYAN, also known as ("aka") "Hayko," aka "Whisper," ARMAN KARAYAN, RAYMOND TARVERDYAN, aka "Rye," aka "Ray," GAGIK ZHAMKOCHYAN, aka "Manic," aka "Panther," aka "Gago," aka "Gag," KARAPET JOEY KARAMUSYAN, aka "Karo," and HAROUTIOUN ARTHUR MELKONIAN, aka "Art," aka "Art from Montebello," together with others known and unknown to the Grand Jury, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, as defined in Title 18, United States Code, Section 1028(d)(7), and as specified below, with the intent to commit, to aid and abet, and in connection with, unlawful activity constituting a violation of Federal law and a felony under any applicable State and local law, including, but not limited to, Access Device Fraud, in violation of Title 18, United States Code, Section 1029(a), and False Personation of Another, in violation of California Penal Code Section 530.5, with said transfer, possession, and use affecting interstate and foreign commerce:

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1 MEANS OF IDENTIFICATION

2 Name, Social Security Number, Date of Birth, Bank Account
3 Numbers, and Driver's License Number belonging to victim M.S.

4 Name, Social Security Number, Date of Birth, and Bank Account
5 Numbers belonging to victim D.C.

6 Name, Social Security Number, Date of Birth, Bank Account
7 Numbers, and Driver's License Number belonging to victim C.B.

8 Name, Social Security Number, Date of Birth, and Bank Account
9 Numbers belonging to victim S.F.

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COUNT ONE HUNDRED AND TWELVE

[18 U.S.C. § 1001(a)(2)]

On or about February 10, 2010, in Los Angeles County, within the Central District of California, in a matter within the jurisdiction of the Federal Bureau of Investigation, defendant HAYK KARAYAN, also known as ("aka") "Hayko," aka "Whisper" ("H. KARAYAN"), knowingly and willfully made a false material statement and representation, in that defendant H. KARAYAN told an agent with the Federal Bureau of Investigation that he did not recall visiting the location at 13847 Saticoy Street in North Hollywood, California, and that he did not work out of the location at 13847 Saticoy Street in North Hollywood, California, when, in truth and in fact, as defendant H. KARAYAN then and there well knew, defendant H. KARAYAN had been to 13847 Saticoy Street in North Hollywood, California, several times and was operating a fraudulent business at that location.

COUNT ONE HUNDRED AND THIRTEEN

[18 U.S.C. § 371]

A. INTRODUCTORY ALLEGATIONS

At all times relevant to this Indictment:

1. PMC Bancorp was licensed by the State of California as a Finance Lender and operated as a mortgage lending business, within the meaning of Title 18, United States Code, Section 20(10).

2. Defendant NAIRA ASTGHIK TEROUNIAN was a real estate broker licensed in the State of California.

B. OBJECT OF THE CONSPIRACY

Beginning on a date unknown to the Grand Jury, and continuing to on or about January 26, 2011, in Los Angeles County, within the Central District of California, and elsewhere, defendants MHER DARBINYAN, also known as ("aka") "Mike," aka "Hollywood Mike," aka "Little Mike," aka "Capone," aka "Caps," aka "Maher" ("DARBINYAN"), KARO YERKANYAN, aka "Guilty," aka "Gator," aka "Kane" ("K. YERKANYAN"), EDGAR YERKANYAN, aka "Edo" ("E. YERKANYAN"), KARINE MKRTCHYAN ("MKRTCHYAN"), and NAIRA ASTGHIK TEROUNIAN ("TEROUNIAN"), together with others known and unknown to the Grand Jury, conspired and agreed with each other to knowingly and intentionally commit the following offense against the United States: False Statements on a Loan Application, in violation of Title 18, United States Code, Section 1014.

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1 C. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE
2 ACCOMPLISHED

3 The object of the conspiracy was to be accomplished, in
4 substance, as follows:

5 1. Defendant DARBINYAN would look for an individual to
6 take title of a house where DARBINYAN lived with defendant
7 MKRTCHYAN, located at 27033 Fairway Lane in Valencia, California
8 ("the Fairway residence"), even though DARBINYAN and MKRTCHYAN
9 intended to reside at the property after it was sold.

10 2. Defendant TEROUNIAN, a real estate agent and loan
11 broker, would advise defendant DARBINYAN about how he should
12 select the person to assume title of the Fairway residence and
13 assist defendants DARBINYAN, K. YERKANYAN, and E. YERKANYAN in
14 obtaining the necessary approvals and loans to transfer title of
15 the property from DARBINYAN to K. YERKANYAN.

16 3. Defendant K. YERKANYAN would agree to pose as a buyer
17 for the Fairway residence, even though K. YERKANYAN did not
18 intend to occupy the Fairway residence.

19 4. Defendant E. YERKANYAN would assist defendants
20 DARBINYAN and K. YERKANYAN in facilitating the sale of the
21 Fairway residence to K. YERKANYAN.

22 5. Defendant MKRTCHYAN would obtain the money for
23 defendant K. YERKANYAN's downpayment on the Fairway residence.

24 6. Defendant K. YERKANYAN would make false statements on
25 a loan application about his income, employment, and intent to
26 occupy the Fairway residence in order to secure the loan with
27 which to purchase the Fairway residence.

1 7. Defendants DARBINYAN and MKRTCHYAN would continue to
2 live in the Fairway residence after it was sold to defendant K.
3 YERKANYAN.

4 C. OVERT ACTS

5 In furtherance of the conspiracy and to accomplish the
6 object of the conspiracy, defendants DARBINYAN, K. YERKANYAN, E.
7 YERKANYAN, MKRTCHYAN, and TEROUNIAN, and others known and unknown
8 to the Grand Jury, committed and caused to be committed various
9 overt acts on or about the following dates, within the Central
10 District of California, and elsewhere, including, but not limited
11 to, the following:

12 1. On or about September 28, 2009, defendants K.
13 YERKANYAN and TEROUNIAN signed a Uniform Residential Loan
14 Application containing false statements.

15 2. On or about September 29, 2009, defendant MKRTCHYAN,
16 using coded language on the telephone, asked defendant DARBINYAN
17 if the loan was going to be approved, notified DARBINYAN that
18 defendant TEROUNIAN could not reach defendant E. YERKANYAN, and
19 asked DARBINYAN how they should proceed.

20 3. On or about September 30, 2009, defendant DARBINYAN
21 spoke with an unindicted co-conspirator on the telephone and told
22 the unindicted co-conspirator, using coded language, that
23 DARBINYAN wanted to find someone to assume title of his house for
24 a few months, refinance it, and then put the house in the name of
25 his wife, defendant MKRTCHYAN.

26 4. On or about October 3, 2009, defendant DARBINYAN
27 spoke with an unindicted co-conspirator on the telephone about
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1 using defendant TEROUNIAN to assist him in finding someone to
2 assume title of his house.

3 5. On or about October 6, 2009, defendants DARBINYAN and
4 E. YERKANYAN spoke by telephone and agreed, using coded language,
5 that the Fairway residence should be put in defendant K.
6 YERKANYAN's name and that E. YERKANYAN would talk to defendant
7 TEROUNIAN to facilitate the transfer of title for the Fairway
8 residence.

9 6. On or about October 13, 2009, defendant DARBINYAN
10 told defendant E. YERKANYAN, in a telephone conversation using
11 coded language, to get copies of defendant K. YERKANYAN's social
12 security and driver's license cards and that DARBINYAN would
13 compensate K. YERKANYAN.

14 7. On or about October 13, 2009, defendants DARBINYAN
15 and TEROUNIAN discussed on the telephone how to transfer title of
16 the Fairway residence to defendant K. YERKANYAN.

17 8. On or about October 13, 2009, defendant TEROUNIAN
18 advised defendant DARBINYAN, in a telephone conversation using
19 coded language, not to use a real estate agent as the buyer
20 because the scheme was fraudulent and they could get in a lot of
21 trouble.

22 9. On or about October 13, 2009, defendant TEROUNIAN
23 told defendant DARBINYAN, in a telephone conversation using coded
24 language, that she was working on the loan for defendant K.
25 YERKANYAN and that she was trying to get approval from the bank.

26 10. On or about October 13, 2009, defendant TEROUNIAN, in
27 a telephone conversation using coded language, told defendant
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1 DARBINYAN that DARBINYAN could get in a lot of trouble if their
2 scheme was discovered.

3 11. On or about October 27, 2009, defendant TEROUNIAN
4 asked defendant DARBINYAN to have defendant E. YERKANYAN email
5 defendant K. YERKANYAN's bank statements to TEROUNIAN so that
6 TEROUNIAN could alter the bank statements.

7 12. On or about December 14, 2009, defendant K. YERKANYAN
8 signed a note promising to pay \$248,000 to PMC Bancorp, a
9 mortgage lending company.

10 13. On or about December 14, 2009, defendant K. YERKANYAN
11 signed an Occupancy Statement, certifying under penalty of Title
12 18, United States Code, Section 1014, and other federal laws,
13 that he would occupy the Fairway residence as his principal
14 residence as required by, and in compliance with the terms of the
15 Deed of Trust/Mortgage/Security Instrument relating to the
16 Fairway residence.

17 14. On or about December 14, 2009, defendants K.
18 YERKANYAN and TEROUNIAN signed a Uniform Residential Loan
19 Application containing false statements about K. YERKANYAN's
20 employment, income, and intent to occupy the Fairway residence.

21 15. On or about December 21, 2009, defendant MKRTCHYAN
22 purchased a cashier's check for \$70,000 for defendant K.
23 YERKANYAN to use as the downpayment to complete the purported
24 purchase of the Fairway residence.

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COUNT ONE HUNDRED AND FOURTEEN

[18 U.S.C. §§ 1014, 2]

On or about December 14, 2009, in Los Angeles County, within the Central District of California, and elsewhere, defendants MHER DARBINYAN, also known as ("aka") "Mike," aka "Hollywood Mike," aka "Little Mike," aka "Capone," aka "Caps," aka "Maher," KARO YERKANYAN, aka "Guilty," aka "Gator," aka "Kane," EDGAR YERKANYAN, aka "Edo," KARINE MKRTCHYAN, and NAIRA ASTGHIK TEROUNIAN knowingly made, willfully caused to be made, and aided and abetted the making of false statements to PMC Bancorp, a mortgage lending business, namely, the execution and submission of a Uniform Residential Loan Application to PMC Bancorp for \$248,000 to purchase 27033 Fairway Lane, Valencia, California, 91381, falsely stating K. YERKANYAN's employment, income, assets, bank accounts, and intent to occupy said property, for the purpose of influencing the actions of the mortgage lending business.

COUNT ONE HUNDRED AND FIFTEEN

[21 U.S.C. § 846]

A. OBJECT OF THE CONSPIRACY

Beginning on a date unknown to the Grand Jury, and continuing to on or about August 15, 2009, in Los Angeles County, within the Central District of California, and elsewhere, defendants PARAMAZ BILEZIKCHYAN, also known as ("aka") "Parik," aka "P," aka "Parnamas Bileziktsian," aka "Bleziktsian Paramas" ("BILEZIKCHYAN"), KARO YERKANYAN, aka "Guilty," aka "Gator," aka "Kane" ("K. YERKANYAN"), SUREN TOROSYAN, aka "Suro," aka "Sunny" ("S. TOROSYAN"), OGANES TEROGANESYAN, aka "Hovo," aka "Hovik," aka "Oganes Terognesyan" ("O. TEROGANESYAN"), ARTUR GABRELYAN, aka "Rubo," aka "Art" ("GABRELYAN"), ADAM DAVOODIAN, aka "Aram" ("DAVOODIAN"), and SARKIS AVEDISIAN, aka "Sako" ("AVEDISIAN"), and others known and unknown to the Grand Jury, conspired and agreed with each other to knowingly and intentionally possess with intent to distribute marijuana, a schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C).

B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE ACCOMPLISHED

The object of the conspiracy was to be accomplished, in substance, as follows:

1. Defendants BILEZIKCHYAN, K. YERKANYAN, S. TOROSYAN, O. TEROGANESYAN, GABRELYAN, and DAVOODIAN would develop a plan to pretend to enter a marijuana partnership with defendant Arnold

1 Moradians, aka "Arno" ("Moradians"), in order to steal a load of
2 marijuana from Moradians and sell it for their own benefit.

3 2. Defendants BILEZIKCHYAN, K. YERKANYAN, and O.
4 TEROGANESYAN would obtain keys for a truck which contained the
5 marijuana belonging to Moradians, and take the truck from its
6 place of storage.

7 3. Defendants BILEZIKCHYAN, K. YERKANYAN, S. TOROSYAN,
8 and GABRELYAN would divide, package, and store the marijuana
9 stolen from Moradians.

10 4. Defendant AVEDISIAN would agree to allow the stolen
11 marijuana to be stored for a time on his property.

12 5. Defendants BILEZIKCHYAN, O. TEROGANESYAN, and
13 GABRELYAN would negotiate the sale of the stolen marijuana.

14 C. OVERT ACTS

15 In furtherance of the conspiracy and to accomplish the
16 object of the conspiracy, defendants BILEZIKCHYAN, K. YERKANYAN,
17 S. TOROSYAN, O. TEROGANESYAN, GABRELYAN, DAVOODIAN, and
18 AVEDISIAN, and others known and unknown to the Grand Jury,
19 committed and caused to be committed various overt acts on or
20 about the following dates, within the Central District of
21 California, and elsewhere, including, but not limited to, the
22 following:

23 1. On or about August 5, 2009, defendant BILEZIKCHYAN,
24 in a telephone conversation using coded language, discussed with
25 defendant S. TOROSYAN the fact that Moradians sells large
26 quantities of marijuana.

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1 2. On or about August 6, 2009, defendant BILEZIKCHYAN,
2 in a telephone conversation using coded language, spoke with
3 defendant DAVOODIAN and asked DAVOODIAN if he had ever purchased
4 marijuana from defendant Moradians, and DAVOODIAN stated that he
5 had just purchased \$20,000 worth of marijuana from Moradians.

6 3. On or about August 7, 2009, defendant BILEZIKCHYAN,
7 in a telephone conversation using coded language, told Moradians
8 that BILEZIKCHYAN would bring some people to help Moradians
9 package his marijuana.

10 4. On or about August 8, 2009, defendant GABRELYAN
11 agreed to meet defendant BILEZIKCHYAN to help package Moradians'
12 marijuana.

13 5. On or about August 8, 2009, defendant BILEZIKCHYAN,
14 in a telephone conversation using coded language, told Moradians
15 that he had sent some guys to help Moradians package his
16 marijuana.

17 6. On or about August 9, 2009, defendant BILEZIKCHYAN,
18 in a telephone conversation using coded language, told defendant
19 O. TEROGANESYAN that BILEZIKCHYAN and defendants K. YERKANYAN and
20 S. TOROSYAN wanted to bring narcotics to O. TEROGANESYAN's auto
21 body shop the next day in order to package the narcotics, and O.
22 TEROGANESYAN informed BILEZIKCHYAN that he could do so.

23 7. On or about August 10, 2009, defendant BILEZIKCHYAN,
24 in a telephone conversation using coded language, told defendant
25 O. TEROGANESYAN that they needed a compressor hose to package the
26 marijuana and asked O. TEROGANESYAN to cover the windows in his
27 office so that they could package the marijuana there, and O.

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1 TEROGANESYAN said they could package the marijuana at his
2 business after the auto body shop workers left for the day.

3 8. On or about August 11, 2009, defendant BILEZIKCHYAN,
4 in a telephone conversation using coded language, discussed with
5 defendant O. TEROGANESYAN stealing the marijuana that they had
6 helped to package for Moradians.

7 9. On or about August 11, 2009, defendant O.
8 TEROGANESYAN, in a telephone conversation using coded language,
9 spoke with defendant BILEZIKCHYAN and agreed to make a copy of
10 the keys for the truck that contained the packaged marijuana
11 belonging to Moradians.

12 10. On or about August 11, 2009, defendant O.
13 TEROGANESYAN made or had made spare keys for the truck containing
14 the marijuana belonging to Moradians.

15 11. On or about August 11, 2009, defendant BILEZIKCHYAN,
16 in a telephone conversation using coded language, told defendant
17 O. TEROGANESYAN that defendant K. YERKANYAN was on his way to
18 assist O. TEROGANESYAN in stealing the truck containing the
19 packaged marijuana, and BILEZIKCHYAN told O. TEROGANESYAN to
20 leave the truck abandoned somewhere after they removed the
21 marijuana; and the truck was eventually left parked on Clifton
22 Place in Glendale, California.

23 12. On or about August 11, 2009, defendant K. YERKANYAN
24 drove away the truck which contained the marijuana.

25 13. On or about August 11, 2009, defendant AVEDISIAN
26 agreed to hide the stolen marijuana on his property.

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1 14. On or about August 11, 2009, defendants BILEZIKCHYAN,
2 K. YERKANYAN, and DAVOODIAN met with Moradians and pretended that
3 K. YERKANYAN and DAVOODIAN were rival claimants to BILEZIKCHYAN
4 and Moradians for the stolen marijuana.

5 15. On or about August 11, 2009, defendant TOROSYAN
6 provided a location for dividing and packaging the stolen
7 marijuana at his property.

8 16. On or about August 11, 2009, defendant BILEZIKCHYAN,
9 in a telephone conversation using coded language, told defendant
10 GABRELYAN that BILEZIKCHYAN was in possession of approximately
11 207 pounds of marijuana, and that the marijuana was worth
12 \$450,000.

13 17. On or about August 11, 2009, defendant GABRELYAN took
14 samples of the stolen marijuana to offer for sale.

15 18. On or about August 15, 2009, defendant BILEZIKCHYAN,
16 in a telephone conversation using coded language, told an
17 unindicted co-conspirator that the marijuana BILEZIKCHYAN and his
18 co-conspirators had stolen from the truck was worth \$450,000,
19 that BILEZIKCHYAN and his co-conspirators divided up the money,
20 and that BILEZIKCHYAN's share was \$150,000.

COUNT ONE HUNDRED AND SIXTEEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(C)]

On or about August 11, 2009, in Los Angeles County, within the Central District of California, and elsewhere, defendants PARAMAZ BILEZIKCHYAN, also known as ("aka") "Parik," aka "P," aka "Parnamas Bileziktsian," aka "Bleziktsian Paramas," KARO YERKANYAN, aka "Guilty," aka "Gator," aka "Kane," SUREN TOROSYAN, aka "Suro," aka "Sunny," OGANES TEROGANESYAN, aka "Hovo," aka "Hovik," aka "Oganes Terognesyan," ARTUR GABRELYAN, aka "Rubo," aka "Art," ADAM DAVOODIAN, aka "Aram," and SARKIS AVEDISIAN, aka "Sako," knowingly and intentionally possessed with intent to distribute marijuana, a schedule I controlled substance.

COUNT ONE HUNDRED AND SEVENTEEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(C)]

On or about August 11, 2009, in Los Angeles County, within the Central District of California, and elsewhere, defendant ARNOLD MORADIANS, also known as "Arno," knowingly and intentionally possessed with intent to distribute marijuana, a schedule I controlled substance.

A. OBJECTS OF THE CONSPIRACY

Beginning on a date unknown to the Grand Jury, and continuing to on or about January 26, 2011, in Los Angeles County, within the Central District of California, and elsewhere, defendants HAYK KARAYAN, also known as ("aka") "Hayko," aka "Whisper" ("H. KARAYAN"), ROMAN TEROGANESYAN, aka "Lil Boy," aka "Rome," aka "Roman Teroganesian," aka "Arthur Teroganesian" ("R. TEROGANESYAN"), ARMAN KARAYAN ("A. KARAYAN"), JACK GAMBARYAN, aka "Zhak Gambarian," aka "Speedy" ("GAMBARYAN"), GRIGOR GARIBYAN, aka "Gokor" ("GARIBYAN"), ARAM KHACHATRYAN ("A. KHACHATRYAN"), ZHIRAYR KARAYAN, aka "Zhiro," aka "Jerry" ("Z. KARAYAN"), ARSEN AYRANJIAN ("AYRANJIAN"), and HOVANNES IGARIAN, aka "Hovo" ("IGARIAN"), and others known and unknown to the Grand Jury, conspired and agreed with each other to knowingly and intentionally manufacture, and possess with intent to distribute, at least 1,000 marijuana plants, a schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A)(vii).

B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE ACCOMPLISHED

The objects of the conspiracy were to be accomplished, in substance, as follows:

1. Defendants H. KARAYAN, A. KARAYAN, and Z. KARAYAN would establish and maintain several marijuana growing sites in or around January 2010.

1 2. Defendant A. KARAYAN would maintain a marijuana
2 growing site at his residence at 12451 Daryl Avenue, in Granada
3 Hills, California.

4 3. Defendant H. KARAYAN would maintain a marijuana
5 growing site at his residence at 18536 Brasilia Drive, in Porter
6 Ranch, California.

7 4. Defendants H. KARAYAN, GAMBARYAN, GARIBYAN, A.
8 KHACHATRYAN, Z. KARAYAN, and IGARIAN would obtain an additional
9 location to be used to grow marijuana plants.

10 5. Defendants H. KARAYAN, GAMBARYAN, GARIBYAN, A.
11 KHACHATRYAN, Z. KARAYAN, and IGARIAN would construct and equip a
12 facility that would enable them to grow large numbers of
13 marijuana plants.

14 6. Defendants H. KARAYAN, GAMBARYAN, GARIBYAN, A.
15 KHACHATRYAN, Z. KARAYAN, and IGARIAN would grow a large number of
16 marijuana plants at the marijuana growing facility they
17 constructed.

18 7. Defendants R. TEROGANESYAN and AYRANJIAN would assist
19 defendant H. KARAYAN in maintaining and expanding his marijuana
20 growing sites.

21 C. OVERT ACTS

22 In furtherance of the conspiracy and to accomplish the
23 objects of the conspiracy, defendants H. KARAYAN, R.
24 TEROGANESYAN, A. KARAYAN, GAMBARYAN, GARIBYAN, A. KHACHATRYAN, Z.
25 KARAYAN, AYRANJIAN, and IGARIAN, and others known and unknown to
26 the Grand Jury, committed and caused to be committed various
27 overt acts on or about the following dates, within the Central
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1 District of California, and elsewhere, including, but not limited
2 to, the following:

3 1. In or around January 2010, defendant AYRANJIAN cared
4 for marijuana plants being grown at the marijuana facilities
5 operated by AYRANJIAN's co-conspirators.

6 2. On or about January 15, 2010, defendants H. KARAYAN
7 and A. KARAYAN, in a telephone conversation using coded language,
8 discussed purchasing plant fertilizer for growing marijuana
9 plants.

10 3. On or about January 16, 2010, defendant H. KARAYAN,
11 in a telephone conversation using coded language, discussed with
12 defendant Z. KARAYAN drying, packaging, and labeling marijuana.

13 4. On or about January 17, 2010, defendant H. KARAYAN
14 told defendant Z. KARAYAN, using coded language on the telephone,
15 that Z. KARAYAN should instruct defendant AYRANJIAN to go to
16 defendant A. KARAYAN's marijuana facility, water the plants, and
17 make sure to vacuum carefully at the location.

18 5. On or about January 21, 2010, defendant H. KARAYAN,
19 in a telephone conversation using coded language, discussed with
20 defendant GAMBARYAN looking for another marijuana grow location.

21 6. On or about January 26, 2010, defendant H. KARAYAN,
22 in a telephone conversation using coded language, discussed with
23 defendants A. KARAYAN and Z. KARAYAN growing marijuana plants.

24 7. On or about February 8, 2010, defendants H. KARAYAN
25 and R. TEROGANESYAN, in a telephone conversation using coded
26 language, discussed their marijuana grow operations, and R.
27 TEROGANESYAN said he was expanding his marijuana grow.

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1 8. On or about February 8, 2010, defendant H. KARAYAN,
2 in a telephone conversation using coded language, told defendant
3 R. TEROGANESYAN that H. KARAYAN had three marijuana grow sites
4 operating and was opening a fourth, and that each grow site had
5 at least 150 marijuana plants.

6 9. On or about February 8, 2010, defendant R.
7 TEROGANESYAN, in a telephone conversation using coded language,
8 spoke with defendant H. KARAYAN, offered to hold some of H.
9 KARAYAN's marijuana plants, and said he could fit approximately
10 200 of H. KARAYAN's marijuana plants at his marijuana grow
11 location.

12 10. On or about February 10, 2010, defendant A. KARAYAN
13 maintained a marijuana growing site at his residence at 12451
14 Daryl Avenue, in Granada Hills, California.

15 11. On or about February 10, 2010, defendant H. KARAYAN
16 possessed approximately 2.38 kilograms of cultivated marijuana, a
17 firearm, namely, a Beretta model 96 .40 caliber semi-automatic
18 pistol, and ammunition, at his residence at 18536 Brasilia Drive,
19 in Northridge, California.

20 12. On or about April 26, 2010, defendant GAMBARYAN
21 brought a propane tank and bamboo stakes to a marijuana growing
22 facility that defendants H. KARAYAN, A. KARAYAN, GAMBARYAN,
23 GARIBYAN, A. KHACHATRYAN, Z. KARAYAN, and IGARIAN were operating
24 at 8239 Lankershim Boulevard, Unit D, in North Hollywood,
25 California (the "marijuana growing facility").

1 13. On or about April 26, 2010, defendants GAMBARYAN and
2 GARIBYAN unloaded the propane tank and bamboo stakes into the
3 marijuana growing facility.

4 14. On or about April 26, 2010, defendant IGARIAN arrived
5 at the marijuana growing facility in an SUV, met defendant
6 GAMBARYAN, and the two shook hands and entered the marijuana
7 growing facility.

8 15. On or about April 26, 2010, defendant IGARIAN exited
9 the marijuana growing facility, backed his SUV up to the door of
10 the marijuana growing facility, and opened the rear hatch of his
11 SUV.

12 16. On or about April 26, 2010, defendant GAMBARYAN
13 brought a black plastic bag of small marijuana plants out of the
14 marijuana growing facility.

15 17. On or about April 26, 2010, defendants GAMBARYAN and
16 IGARIAN loaded the bag of marijuana plants into IGARIAN's SUV.

17 18. On or about April 26, 2010, defendants H. KARAYAN,
18 GARIBYAN, A. KHACHATRYAN, and Z. KARAYAN met inside the marijuana
19 growing facility.

20 19. On or about April 26, 2010, defendants GAMBARYAN, A.
21 KHACHATRYAN, and Z. KARAYAN each possessed on his person a key to
22 the door of the marijuana growing facility.

23 20. On or about April 26, 2010, defendants H. KARAYAN, A.
24 KARAYAN, GAMBARYAN, GARIBYAN, A. KHACHATRYAN, Z. KARAYAN, and
25 IGARIAN possessed approximately 567 marijuana plants, as well as
26 equipment used to grow marijuana, including one-gallon and five-
27 gallon pots containing potting soil, high wattage overhead light
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1 bulbs with reflector shades, air conditioning units, dehumidifier
2 units, fans, carbon filter systems, watering tubs, a submersible
3 pump, and a carbon dioxide generator attached to a propane tank,
4 all inside the marijuana growing facility.

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COUNT ONE HUNDRED AND NINETEEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(vii)]

On or about April 26, 2010, in Los Angeles County, within the Central District of California, and elsewhere, defendants HAYK KARAYAN, also known as ("aka") "Hayko," aka "Whisper," ARMAN KARAYAN, JACK GAMBARYAN, aka "Zhak Gambarian," aka "Speedy," GRIGOR GARIBYAN, aka "Gokor," ARAM KHACHATRYAN, ZHIRAYR KARAYAN, aka "Zhiro," aka "Jerry," ARSEN AYRANJIAN, and HOVANNES IGARIAN, aka "Hovo," knowingly and intentionally manufactured and possessed with the intent to distribute at least 100 marijuana plants, that is, approximately 567 marijuana plants, a schedule I controlled substance.

COUNT ONE HUNDRED AND TWENTY

[18 U.S.C. § 1029(a)(3)]

On or about September 3, 2010, in Los Angeles County, within the Central District of California, and elsewhere, defendant ANDRANIK ALOYAN, also known as ("aka") "Andy," aka "Ando," knowingly and with intent to defraud possessed fifteen or more unauthorized access devices, as defined in Title 18, United States Code, Sections 1029(e)(1) and (3), namely, approximately 47 credit card account numbers and bank account numbers in the names of other persons, with said possession affecting interstate and foreign commerce.

COUNT ONE HUNDRED AND TWENTY-ONE

[18 U.S.C. §.1028A(a) (1)]

On or about September 3, 2010, in Los Angeles County, within the Central District of California, and elsewhere, defendant ANDRANIK ALOYAN, also known as ("aka") "Andy," aka "Ando," together with others known and unknown to the Grand Jury, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, that is, the names and account numbers of victims A.A. and K.K., during and in relation to Access Device Fraud, a felony violation of Title 18, United States Code, Section 1029(a) (3), as charged in Count One Hundred and Twenty of this Indictment.

COUNT ONE HUNDRED AND TWENTY-TWO

[18 U.S.C. §§ 1028(a)(7), 2]

On or about September 3, 2010, in Los Angeles County, within the Central District of California, and elsewhere, defendant ANDRANIK BAKHCHADJIAN, also known as ("aka") "Ando," aka "Andranik Bakhcadjian," together with others known and unknown to the Grand Jury, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, as defined in Title 18, United States Code, Section 1028(d)(7), with the intent to commit, to aid and abet, and in connection with, unlawful activity constituting a violation of Federal law and a felony under any applicable State and local law, including, but not limited to, Bank Fraud, in violation of Title 18, United States Code, Section 1344, and Access Device Fraud, in violation of Title 18, United States Code, Section 1029, with said transfer, possession, and use affecting interstate and foreign commerce.

COUNT ONE HUNDRED AND TWENTY-THREE

[18 U.S.C. §§ 1955, 2]

Beginning on a date unknown to the Grand Jury, but no later than on or about December 28, 2009, and continuing through on or about January 26, 2011, in Los Angeles County, within the Central District of California, and elsewhere, defendants PARAMAZ BILEZIKCHYAN, also known as ("aka") "Parik," aka "P," aka "Parnamas Bileziktsian," aka "Bleziktsian Paramas," HAYK KARAYAN, aka "Hayko," aka "Whisper," ROMAN TEROGANESYAN, aka "Lil Boy," aka "Rome," aka "Roman Teroganesian," aka "Arthur Teroganesian," and JACK GAMBARYAN, aka "Zhak Gambarian," aka "Speedy," while aiding and abetting each other, and together with others known and unknown to the Grand Jury, knowingly conducted, financed, managed, supervised, directed, and owned, and willfully caused to be conducted, financed, managed, supervised, directed, and owned, all or part of an illegal gambling business, in violation of the laws of the State of California and the Municipal Code for the City of Los Angeles.

COUNT ONE HUNDRED AND TWENTY-FOUR

[18 U.S.C. § 922(g)(1)]

On or about August 20, 2009, in Los Angeles County, within the Central District of California, defendant HARUT TOROSYAN, also known as ("aka") "Menace," aka "Harout Torosyan" ("H. TOROSYAN"), knowingly possessed a firearm, namely, a Springfield Armory model XD .45 caliber handgun, bearing serial number US690631, and ammunition, namely, two rounds of Remington .45 caliber ammunition, and one round of Winchester .45 caliber ammunition, in and affecting interstate and foreign commerce.

Such possession occurred after defendant H. TOROSYAN had been convicted of at least one of the following felony crimes, each punishable by a term of imprisonment exceeding one year:

(1) Manufacture, Sale, or Possession of a Dangerous Weapon, in violation of California Penal Code Section 12020(a)(1), in the Superior Court of the State of California, County of Los Angeles, case number GA05306301, on or about June 11, 2003;

(2) Taking Identity of Another Person, in violation of Arizona Revised Statutes Section 13-2008, in the Superior Court of the State of Arizona for Maricopa County, case number CR 2006-030210, on or about February 16, 2007.

COUNT ONE HUNDRED AND TWENTY-FIVE

[18 U.S.C. § 922(g)(1)]

On or about November 23, 2009, in Los Angeles County, within the Central District of California, defendant MIGUEL AGUSTIN RAMIREZ, also known as ("aka") "Mugsy," aka "Mugs" ("RAMIREZ"), knowingly possessed firearms, namely, a Smith & Wesson model 638-2 .38 caliber revolver, bearing serial number CCH2705, a Star model 30M 9 millimeter caliber semi-automatic pistol, bearing serial number 1885728, and an Intratec model Tec-22 .22 caliber semi-automatic pistol, bearing serial number 36039; and ammunition, namely, eleven rounds of Federal .22 caliber ammunition, in and affecting interstate and foreign commerce.

Such possession occurred after defendant RAMIREZ had been convicted of at least one of the following felony crimes, each punishable by a term of imprisonment exceeding one year:

(1) Possession of a Controlled Substance, in violation of California Health and Safety Code Section 11350(A), in the Superior Court of the State of California, County of Los Angeles, case number BA094160, on or about April 28, 1994;

(2) Felon in Possession of a Firearm, in violation of California Penal Code Section 12021(A)(1), in the Superior Court of the State of California, County of Los Angeles, case number BA099431, on or about September 27, 1994;

(3) Transportation or Sale of a Controlled Substance, in violation of California Health and Safety Code Section 11352(A), in the Superior Court of the State of California, County of Los Angeles, case number BA29192303, on or about December 15, 2006;

1 (4) Transportation of a Controlled Substance, in
2 violation of California Health and Safety Code Section 11379, in
3 the Superior Court of the State of California, County of Los
4 Angeles, case number BA29192303, on or about December 15, 2006;

5 (5) Use of a Fake Compartment to Transport a Controlled
6 Substance, in violation of California Health and Safety Code
7 Section 11366.8(A), in the Superior Court of the State of
8 California, County of Los Angeles, case number BA29192302, on or
9 about December 15, 2006;

10 (6) Felon in Possession of a Firearm, in violation of
11 California Penal Code Section 12021(A)(1), in the Superior Court
12 of the State of California, County of Los Angeles, case number
13 BA29192303, on or about December 15, 2006.

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1 Such possession occurred after defendant SEROBYAN had been
2 convicted of a felony punishable by a term of imprisonment
3 exceeding one year, namely: Three Counts of Taking the Identity
4 of Another, in violation of Arizona Penal Code Section 13-2008A,
5 in the Superior Court of the State of Arizona for Maricopa
6 County, case number CR2006030210001SE, on or about October 6,
7 2006.

8 At the above time and place, defendant GEVORK KASABYAN, aka
9 "Kash," aided, abetted, counseled, commanded, induced, and
10 procured the commission of the offense alleged above.

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1 State of California, County of Riverside, case number ICR18906,
2 on or about March 28, 1995;

3 (5) Assault with Firearm on a Person, in violation of
4 California Penal Code Section 245(a)(2), in the Superior Court of
5 the State of California, County of Riverside, case number
6 ICR18906, on or about March 28, 1995.

7 Such possession occurred after defendant GONZALEZ-MUNOZ JR.
8 had been convicted of at least one of the following felony
9 crimes, punishable by a term of imprisonment exceeding one year:

10 (1) Conspiracy to Possess with Intent to Distribute a
11 Controlled Substance, in violation of 21 U.S.C. §§ 846,
12 841(a)(1), in the United States District Court for the Southern
13 District of New York, case number 90-CR-0015-RPP-11, on or about
14 March 7, 1990;

15 (2) Possession of a Controlled Substance for Sale, in
16 violation of California Health and Safety Code Section 11378, in
17 the Superior Court of the State of California, County of Los
18 Angeles, case number XEAKA04736101, on or about May 23, 2002;

19 (3) Assault with a Dangerous Weapon in Aid of
20 Racketeering, in violation of 18 U.S.C. § 1959(a)(3), in the
21 United States District Court for the Central District of
22 California, case number CR 02-938-DOC, on or about February 7,
23 2005.

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COUNT ONE HUNDRED AND TWENTY-NINE

[18 U.S.C. § 1001(a)(2)]

1 On or about December 30, 2009, in Los Angeles County, within
2 the Central District of California, in a matter within the
3 jurisdiction of the Federal Bureau of Investigation, defendant
4 MARAT SHAKHRAMANYAN ("SHAKHRAMANYAN") knowingly and willfully
5 made a false material statement and representation, in that
6 defendant SHAKHRAMANYAN told an officer with the Glendale Police
7 Department that a plastic bag containing a high-capacity gun
8 magazine and 35 rounds of .45 caliber ammunition, which the
9 officer had just found in defendant SHAKHRAMANYAN's car, might
10 have been forgotten and left in the car by one of defendant
11 SHAKHRAMANYAN's friends who had driven the car, when, in truth
12 and in fact, as defendant SHAKHRAMANYAN then and there well knew,
13 defendant SHAKHRAMANYAN had been told to pick up the gun magazine
14 and had been given directions as to where to obtain it by Paramaz
15 Bilezikchyan, also known as ("aka") "Parik," aka "P," aka
16 "Parnamas Bileziktsian," aka "Bleziktsian Paramas," to whom the
17 gun magazine belonged.
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COUNT ONE HUNDRED AND THIRTY

[18 U.S.C. § 922(g)(1)]

On or about January 19, 2010, in Los Angeles County, within the Central District of California, defendants EDGAR KHACHATRYAN, also known as ("aka") "Gunner", aka "Lil Gunner," aka "Edo" ("E. KHACHATRYAN"), and GRACHIA NALBANDYAN, aka "Raider," aka "Puffy," aka "Crazy" ("NALBANDYAN"), knowingly possessed firearms, namely, a Sig Sauer P220 .45 caliber semi-automatic handgun, bearing serial number G286010, and a Maadi Helwan 9 millimeter caliber handgun, bearing serial number 1128786; and ammunition, namely, six rounds of Remington .45 caliber ammunition, one round of Speer .45 caliber ammunition, one round of Pro-Load .45 caliber ammunition, four rounds of Winchester 9 millimeter caliber ammunition, and three rounds of Speer 9 millimeter caliber ammunition, in and affecting interstate and foreign commerce.

Such possession occurred after defendant E. KHACHATRYAN had been convicted of a felony punishable by a term of imprisonment exceeding one year, namely: Carrying a Loaded Firearm in Public, in violation of California Penal Code Section 12031(A)(1), in the Superior Court of the State of California, County of Los Angeles, case number GA068124, or about February 6, 2007.

Such possession occurred after defendant NALBANDYAN had been convicted of a felony punishable by a term of imprisonment exceeding one year, namely: Vandalism with a Gang Allegation, in violation of California Penal Code Section 594(A), in the

1 Superior Court of the State of California, County of Los Angeles,
2 case number GA070988-01, on or about October 31, 2007.

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COUNT ONE HUNDRED AND THIRTY-ONE

[18 U.S.C. § 922(g)(1)]

On or about February 10, 2010, in Los Angeles County, within the Central District of California, defendant KARO YERKANYAN, also known as ("aka") "Guilty," aka "Gator," aka "Kane" ("K. YERKANYAN"), knowingly possessed a firearm, namely, a Beretta model 92FS 9 millimeter caliber semi-automatic pistol, bearing serial number BER402785Z, and ammunition, namely, six rounds of Winchester 9 millimeter caliber ammunition, two rounds of Royal Ordnance Factory - Blackpole 9 millimeter caliber ammunition, two rounds of Federal 9 millimeter caliber ammunition, one round of Wolf 9 millimeter caliber ammunition, one round of Royal Ordnance Factory - Hirwaun 9 millimeter caliber ammunition, one round of Hirtenberger Patronen 9 millimeter caliber ammunition, one round of COR-BON 9 millimeter caliber ammunition, and one round of 9 millimeter caliber ammunition marked "NPA," in and affecting interstate and foreign commerce.

Such possession occurred after defendant K. YERKANYAN had been convicted of a felony punishable by a term of imprisonment exceeding one year, namely: Driving with a Blood Alcohol Level above .08% Causing Bodily Injury, in violation of California Vehicle Code Section 23153(B), in the Superior Court of the State of California, County of Los Angeles, case number LAVLA04165601, on or about February 10, 2003.

COUNT ONE HUNDRED AND THIRTY-TWO

[18 U.S.C. § 922(g)(1)]

On or about February 10, 2010, in Los Angeles County, within the Central District of California, defendant HAYK KARAYAN, also known as ("aka") "Hayko," aka "Whisper" ("H. KARAYAN"), knowingly possessed a firearm, namely, a Beretta model 96 .40 caliber semi-automatic pistol, with an obliterated serial number, and ammunition, namely, thirteen rounds of Federal .40 caliber ammunition, and one round of Remington .40 caliber ammunition, in and affecting interstate and foreign commerce.

Such possession occurred after defendant H. KARAYAN had been convicted of a felony punishable by a term of imprisonment exceeding one year, namely: Assault with a Firearm on a Person, in violation of California Penal Code Section 245(a), in the Superior Court of the State of California, County of Los Angeles, case number GA053647, on or about May 13, 2005.

COUNT ONE HUNDRED AND THIRTY-THREE

[18 U.S.C. § 922(g)(1)]

On or about September 3, 2010, in Los Angeles County, within the Central District of California, defendant ANDRANIK ALOYAN, also known as ("aka") "Andy," aka "Ando" ("ALOYAN"), knowingly possessed a firearm, namely, a Llama .22 caliber pistol, bearing serial number 658698, in and affecting interstate and foreign commerce.

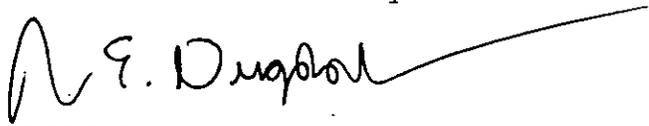
Such possession occurred after defendant ALOYAN had been convicted of a felony punishable by a term of imprisonment exceeding one year, namely: Possession of a Pistol with a Removed Serial Number, in violation of California Penal Code Section 12031, in the Superior Court of the State of California, County of Los Angeles, Case Number LA064010, on or about February 22, 2010.

1 (5) Receiving Stolen Property, in violation of California
2 Penal Code Section 496, in the Superior Court of the State of
3 California, County of Los Angeles, Case Number LA06001, on or
4 about January 22, 2009.

5
6 A TRUE BILL

7 151
8 Foreperson
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10 ANDRÉ BIROTTE JR.
11 United States Attorney

12 

13 ROBERT E. DUGDALE
14 Assistant United States Attorney
15 Chief, Criminal Division

16 ELIZABETH R. YANG
17 Assistant United States Attorney
18 Chief, Violent & Organized Crime Section

19 E. MARTIN ESTRADA
20 SARAH LEVITT
21 STEPHEN G. WOLFE
22 Assistant United States Attorneys
23 Violent & Organized Crime Section

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28 CRISTINA MORENO
Department of Justice Trial Attorney
Organized Crime and Racketeering Section