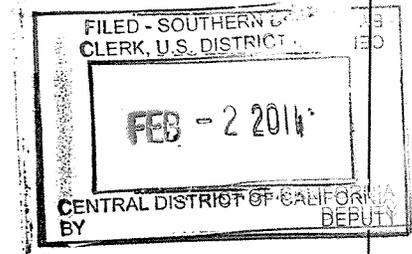


ORIGINAL



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

September 2010 Grand Jury

11	UNITED STATES OF AMERICA,)	No. SA CR 09-248(A)-DOC
12	Plaintiff,)	
13	v.)	<u>F I R S T</u>
)	<u>S U P E R S E D I N G</u>
)	<u>I N D I C T M E N T</u>
14	ARMAN SHAROPETROSIAN,)	[18 U.S.C. § 1349: Conspiracy
	aka "Horse,")	to Commit Bank Fraud;
15	aka "Dzi,")	18 U.S.C. § 1344: Bank Fraud;
	ANGUS BROWN,)	18 U.S.C. § 1028A(a)(1):
16	aka "Homicide,")	Aggravated Identity Theft;
	aka "Cide,")	18 U.S.C. § 1029: Access
17	aka "Cy,")	Device Fraud; 18 U.S.C.
	DAMIAN WADSACK,)	§§ 2(a), (b): Aiding and
18	aka "Nephew,")	Abetting and Causing an Act
	aka "Neff,")	to be Done]
19	LEWELLYN CHARLES COX IV,)	
	aka "Showtime,")	
20	aka "Showtyme,")	
	aka "Sho,")	
21	KAREN MARKOSIAN,)	
	aka "Kar,")	
22	aka "Garen,")	
	KRISTINE OGANDZHANYAN,)	
23	aka "Krist,")	
	aka "Kristik,")	
24	OGANES TANGABAKYAN,)	
	aka "Hovo,")	
25	aka "Hovo Spito,")	
	VERGINE GASPARIAN,)	
26	aka "Vikush,")	
	ARTUSH MARGARYAN,)	
27	HOVHANNES DILBOYAN,)	
	aka "Andrankik Harutyunyan,")	
28	KELLY BENSON,)	
	aka "K,")	

1 The Grand Jury charges:

2 GENERAL ALLEGATION AND DEFINITIONS

3 1. At all times relevant to this Indictment, Bank of
4 America, Citibank, and JP Morgan Chase Bank (formerly Washington
5 Mutual) ("Chase Bank") were federally insured financial
6 institutions, namely, banks whose deposits were insured by the
7 Federal Deposit Insurance Corporation.

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

1 referred to herein as "the defendants"), together with others
2 known and unknown to the Grand Jury, conspired and agreed with
3 each other to knowingly and with intent to defraud, devise,
4 execute, and attempt to execute a scheme to defraud Bank of
5 America, Citibank, Chase Bank, and other financial institutions
6 as to material matters, and to obtain money and property from
7 Bank of America, Citibank, Chase Bank, and other financial
8 institutions by means of material false and fraudulent pretenses,
9 representations, and promises, and the concealment of material
10 facts, all in violation of Title 18, United States Code, Section
11 1344.

12 III. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE
13 ACCOMPLISHED

14 3. The object of the conspiracy was to be accomplished in
15 substance as follows:

16 a. Defendants SHAROPETROSIAN and BROWN, who, at times
17 during the course of the conspiracy and scheme described herein,
18 were incarcerated inmates with the California Department of
19 Corrections, would coordinate and direct other defendants and co-
20 conspirators to obtain bank account information and personal
21 identifying information belonging to victim-account owners, and
22 then use that information to transfer victim-account funds,
23 obtain victim-account checks, forge checks, cash and deposit
24 checks, and distribute proceeds, all without the victim-account
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1 owners' consent, knowledge, and authorization, as described
2 below.

3 b. Defendants SHAROPETROSIAN, BROWN, WADSACK, COX,
4 MARKOSIAN, OGANDZHANYAN, TANGABAKYAN, GASPARIAN, BENSON, SMITH,
5 YOUNG, HAWKINS, and BELL, and other co-conspirators known and
6 unknown to the Grand Jury, would obtain bank account information
7 and personal identifying information belonging to victim-account
8 owners, often from bank employees, including defendant BROOKS,
9 co-conspirators Tritia Black ("Black"), Steven Lawrence
10 ("Lawrence"), and Brandon Washington ("Washington"), and other
11 co-conspirators known and unknown to the Grand Jury, all without
12 the victim-account owners' consent, knowledge, and authorization.

13 c. Defendants SHAROPETROSIAN, BROWN, WADSACK, COX,
14 MARKOSIAN, OGANDZHANYAN, BENSON, HAWKINS, and BELL, and other co-
15 conspirators known and unknown to the Grand Jury, would use the
16 bank account information belonging to victim-account owners,
17 including their names, personal identifying information, and
18 victim-account values, to contact their respective banks and
19 obtain additional victim-account information, including account
20 balances, recent transactions, and routing numbers, all without
21 the victim-account owners' consent, knowledge, and authorization.

22 d. Defendants SHAROPETROSIAN, BROWN, WADSACK, COX,
23 MARKOSIAN, OGANDZHANYAN, BENSON, and BELL, and other co-
24 conspirators known and unknown to the Grand Jury, would gather
25 additional personal identifying information concerning the
26 victim-account owners, including the victim-account owners'
27 signatures, telephone numbers, prior addresses, and property
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1 documents, in order to access the victim-accounts and forge
2 checks drawn on the victim-accounts, all without the victim-
3 account owners' consent, knowledge, and authorization.

4 e. Defendants SHAROPETROSIAN, BROWN, WADSACK, COX,
5 MARKOSIAN, OGANDZHANYAN, TANGABAKYAN, BENSON, SMITH, HAWKINS, and
6 BELL, and other co-conspirators known and unknown to the Grand
7 Jury, would use the victim-account owners' personal identifying
8 information to access the victim-accounts and make changes to the
9 victim-accounts, such as changing the telephone numbers and
10 addresses associated with the victim-accounts to telephone
11 numbers and addresses controlled by defendants, and to transfer
12 funds among the victim-account owners' bank accounts, all without
13 the victim-account owners' consent, knowledge, and authorization.

14 f. Defendants SHAROPETROSIAN, BROWN, WADSACK, COX,
15 MARKOSIAN, OGANDZHANYAN, TANGABAKYAN, BENSON, SMITH, HAWKINS, and
16 BELL, and other co-conspirators known and unknown to the Grand
17 Jury, would use the victim-account owners' bank account
18 information and personal identifying information to obtain
19 unauthorized checks for the victim-accounts, often by
20 intercepting and stealing the checks once they were mailed to the
21 victim-account owners' residences or addresses controlled by
22 defendants, all without the victim-account owners' consent,
23 knowledge, and authorization.

24 g. Defendants BROWN, WADSACK, COX, OGANDZHANYAN,
25 GASPARIAN, BENSON, SMITH, and HAWKINS, and other co-conspirators
26 known and unknown to the Grand Jury, would prepare and forge
27 fraudulent checks corresponding to the victim-accounts, all
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1 without the victim-account owners' consent, knowledge, and
2 authorization.

3 h. Defendants WADSACK, COX, MARKOSIAN, BENSON, SMITH,
4 YOUNG, HAWKINS, STRONG, BELL, RUTANHIRA, CHATTON, and HASKELL,
5 co-conspirator Nicholas Watson ("Watson"), and other co-
6 conspirators known and unknown to the Grand Jury, would recruit
7 other co-conspirators and provide fraudulent checks drawn on the
8 victim-accounts to those co-conspirators, including defendants
9 MARGARYAN and DILBOYAN, and co-conspirators FNU LNU, aka "Lamar,"
10 J.B., R.J., G.M., L.L., K.D., A.B.S., J.A.R., A.J.S., V.F., V.R.,
11 M.G., L.T., J.S., A.U., J.N.R., S.D., L.R., K.M., G.C., J.H.,
12 H.D., and C.R., who would cash and deposit, and attempt to cash
13 and deposit, the fraudulent checks, all without the victim-
14 account owners' consent, knowledge, or authorization.

15 i. Defendants would distribute proceeds from the
16 fraudulent bank fraud scheme described herein amongst themselves.

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1 IV. OVERT ACTS

2 In furtherance of the conspiracy and to accomplish the
3 object of the conspiracy, defendants SHAROPETROSIAN, BROWN,
4 WADSACK, COX, MARKOSIAN, OGANDZHANYAN, TANGABAKYAN, GASPARIAN,
5 MARGARYAN, DILBOYAN, BENSON, SMITH, YOUNG, HAWKINS, STRONG, BELL,
6 BROOKS, RUTANHIRA, CHATTON, and HASKELL, and others known and
7 unknown to the Grand Jury, committed and caused to be committed
8 various overt acts, within the Central District of California,
9 and elsewhere, including, but not limited to, the following:

10 1. On or about May 16, 2005, defendants BROWN and COX
11 provided a fraudulently obtained check from a Bank of America
12 account belonging to victims J.V. and T.V. to co-conspirator FNU
13 LNU, aka "Lamar."

14 2. On or about May 16, 2005, co-conspirator J.B. cashed a
15 fraudulently obtained check in the amount of \$8,500 drawn on a
16 Bank of America account belonging to victims J.V. and T.V. at a
17 Bank of America branch in Irvine, California.

18 3. On or about September 16, 2005, defendant COX provided
19 a fraudulently obtained check from a Bank of America account
20 belonging to victim K.R. to co-conspirator R.J.

21 4. On or about September 16, 2005, at the direction of
22 defendant COX, co-conspirator R.J. deposited a fraudulently
23 obtained check in the amount of \$35,500 drawn on a Bank of
24 America account belonging to victim K.R. at a Bank of America
25 branch in Diamond Bar, California.

26 5. On or about September 20, 2005, defendant COX provided
27 two fraudulently obtained checks from a Bank of America account
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1 belonging to victim K.R. to co-conspirator G.M.

2 6. On or about September 20, 2005, at the direction of
3 defendant COX, co-conspirator G.M. cashed a fraudulently obtained
4 check in the amount of \$8,350 drawn on a Bank of America account
5 belonging to victim K.R. at a Bank of America branch in Whittier,
6 California.

7 7. On or about September 22, 2005, at the direction of
8 defendant COX, co-conspirator G.M. cashed a fraudulently obtained
9 check in the amount of \$8,920 drawn on a Bank of America account
10 belonging to victim K.R. at a Bank of America branch in Whittier,
11 California.

12 8. On or about September 7, 2006, defendant HAWKINS called
13 Bank of America's check ordering service and ordered checks for
14 victim E.I.U.'s bank account that were later fraudulently cashed.

15 9. On or about November 1, 2006, defendant HAWKINS
16 possessed fraudulently obtained checks from a Bank of America
17 account belonging to victims H.B. and L.B.

18 10. On or about November 2, 2006, defendant HAWKINS
19 provided a fraudulently obtained check from a Bank of America
20 account belonging to victims H.B. and L.B. to co-conspirator L.L.

21 11. On or about November 2, 2006, at the direction of
22 defendant HAWKINS, co-conspirator L.L. cashed a fraudulently
23 obtained check in the amount of \$6,600 drawn on a Bank of America
24 account belonging to victims H.B. and L.B. at a Bank of America
25 branch in Inglewood, California.

26 12. In or around 2006 and 2007, defendant SMITH obtained
27 from co-conspirator Lawrence confidential victim-account

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1 information, including the victim-account owners' addresses,
2 telephone numbers, dates of birth, social security numbers, and
3 account numbers.

4 13. In or around 2007, defendant BROWN and other unindicted
5 co-conspirators obtained from co-conspirator Black confidential
6 victim-account information, including the victim-account owners'
7 addresses, telephone numbers, dates of birth, social security
8 numbers, and account numbers.

9 14. On or about April 7, 2007, defendant BROWN possessed a
10 notebook containing victim T.T.'s date of birth, social security
11 number, driver's license number, and Bank of America account
12 number, in Carmel, California.

13 15. On or about July 13, 2007, defendant YOUNG provided a
14 fraudulently obtained check from a Bank of America account
15 belonging to victim H.S. to co-conspirator K.D.

16 16. On or about July 13, 2007, at the direction of
17 defendant YOUNG, co-conspirator K.D. cashed a fraudulently
18 obtained check in the amount of \$5,900 drawn on a Bank of America
19 account belonging to victim H.S. at a Bank of America branch in
20 Chino Hills, California.

21 17. On or about September 4, 2008, defendant STRONG cashed
22 a fraudulently obtained check in the amount of \$6,800 drawn on a
23 Bank of America account belonging to victims S.K. and L.K. at a
24 Bank of America branch in Anaheim, California.

25 18. On or about September 4, 2008, defendant STRONG cashed
26 a fraudulently obtained check in the amount of \$8,900 drawn on a
27 Bank of America account belonging to victims S.K. and L.K. at a
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1 Bank of America branch in Anaheim, California.

2 19. On or about December 12, 2008, defendant BROWN called
3 Bank of America, represented himself as victim C.B., and obtained
4 a tracking number for checks that had been fraudulently ordered
5 on victim C.B.'s bank account.

6 20. In or around 2009 and 2010, defendant BROOKS accessed
7 and sold confidential victim-account information, including the
8 victim account owners' addresses, telephone numbers, dates of
9 birth, social security numbers, and account numbers, to
10 defendants COX, SMITH, and YOUNG.

11 21. In or around 2009, defendants HAWKINS and SMITH
12 obtained confidential victim-account information, including the
13 victim-account owners' addresses, telephone numbers, dates of
14 birth, social security numbers, mother's maiden names, and
15 account numbers, from co-conspirator Washington.

16 22. On or about April 8, 2009, defendant COX called Bank of
17 America's check ordering service, falsely represented himself as
18 victim G.D., and ordered checks for victim G.D.'s bank account
19 that were later fraudulently cashed.

20 23. On or about April 20, 2009, defendant HAWKINS provided
21 co-conspirator Watson with two fraudulently obtained checks from
22 a Bank of America account belonging to victim H.G.A.

23 24. On or about April 20, 2009, co-conspirator Watson gave
24 two fraudulently obtained checks from a Bank of America account
25 belonging to victim H.G.A. to co-conspirator A.B.S.

26 25. On or about April 20, 2009, co-conspirator A.B.S.
27 cashed two fraudulently obtained checks in the amounts of
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1 \$2,795.50 and \$3,917.85 drawn on a Bank of America account
2 belonging to victim H.G.A. at Bank of America branches in
3 Fullerton and Inglewood, California.

4 26. On or about April 28, 2009, defendant SMITH contacted
5 co-conspirator Washington and asked for confidential account
6 information for a Bank of America account belonging to victim
7 C.F.

8 27. On or about May 7, 2009, defendant YOUNG provided a
9 fraudulently obtained check from a Bank of America account
10 belonging to victim S.L. to co-conspirator J.A.R.

11 28. On or about May 7, 2009, at the direction of defendant
12 YOUNG, co-conspirator J.A.R. cashed a fraudulently obtained check
13 in the amount of \$5,100 drawn on a Bank of America account
14 belonging to victim S.L. at a Bank of America branch in Barstow,
15 California.

16 29. On or about May 8, 2009, defendant YOUNG provided a
17 fraudulently obtained check from a Bank of America account
18 belonging to victim S.L. to co-conspirator A.J.S.

19 30. On or about May 8, 2009, at the direction of defendant
20 YOUNG, co-conspirator A.J.S. cashed a fraudulently obtained check
21 in the amount of \$6,100 drawn on a Bank of America account
22 belonging to victim S.L. at a Bank of America branch in Los
23 Angeles, California.

24 31. On or about May 11, 2009, defendant YOUNG provided a
25 fraudulently obtained check from a Bank of America account
26 belonging to victims J.C. and C.C. to co-conspirator J.A.R.

27 32. On or about May 11, 2009, at the direction of defendant
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1 YOUNG and an unindicted co-conspirator known to the Grand Jury,
2 co-conspirator J.A.R. cashed a fraudulently obtained check in the
3 amount of \$6,000 drawn on a Bank of America account belonging to
4 victims J.C. and C.C. at a Bank of America branch in Duarte,
5 California.

6 33. On or about May 14, 2009, defendant YOUNG provided a
7 fraudulently obtained check from a Bank of America account
8 belonging to victims J.C. and C.C. to co-conspirator V.F.

9 34. On or about May 14, 2009, at the direction of defendant
10 YOUNG and an unindicted co-conspirator known to the Grand Jury,
11 co-conspirator V.F. cashed a fraudulently obtained check in the
12 amount of \$6,340 drawn on a Bank of America account belonging to
13 victims J.C. and C.C. at a Bank of America branch in Duarte,
14 California.

15 35. On or about May 15, 2009, defendant YOUNG provided a
16 fraudulently obtained check from a Bank of America account
17 belonging to victims G.L. and T.L. to co-conspirator J.A.R.

18 36. On or about May 15, 2009, at the direction of defendant
19 YOUNG and an unindicted co-conspirator known to the Grand Jury,
20 co-conspirator J.A.R. cashed a fraudulently obtained check in the
21 amount of \$5,000 drawn on a Bank of America account belonging to
22 victims G.L. and T.L. at a Bank of America branch in Los Angeles,
23 California.

24 37. On or about June 1, 2009, defendants SMITH and YOUNG
25 provided a fraudulently obtained check from a Bank of America
26 account belonging to victims A.S. and J.S. to co-conspirator V.F.

27 38. On or about June 1, 2009, at the direction of defendant
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1 YOUNG and an unindicted co-conspirator known to the Grand Jury,
2 co-conspirator V.F. cashed a fraudulently obtained check in the
3 amount of \$5,000 drawn on a Bank of America account belonging to
4 victims A.S. and J.S. at a Bank of America branch in Bell,
5 California.

6 39. On or about June 4, 2009, defendants WADSACK and STRONG
7 provided a fraudulently obtained check from a Bank of America
8 account belonging to victims H.J.B. and H.S.B. to co-conspirator
9 V.R.

10 40. On or about June 4, 2009, at the direction of defendant
11 STRONG and co-conspirator Watson, co-conspirator V.R. cashed a
12 fraudulently obtained check in the amount of \$7,423 drawn on a
13 Bank of America account belonging to victims H.J.B. and H.S.B. at
14 a Bank of America branch in Los Angeles, California.

15 41. On or about June 5, 2009, defendant STRONG provided a
16 fraudulently obtained check from a Bank of America account
17 belonging to victims H.J.B. and H.S.B. to co-conspirator M.G.

18 42. On or about June 5, 2009, at the direction of defendant
19 STRONG, co-conspirator M.G. cashed a fraudulently obtained check
20 in the amount of \$5,000 drawn on a Bank of America account
21 belonging to victims H.J.B. and H.S.B. at a Bank of America
22 branch in Los Angeles, California.

23 43. On or about June 19, 2009, an unidentified co-
24 conspirator changed the address associated with a Bank of America
25 account belonging to victim W.D. to an address in defendant
26 BENSON's apartment complex in Placentia, California.

27 44. On or about June 19, 2009, unidentified co-conspirators
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1 cashed two checks totaling \$12,300 drawn on a Bank of America
2 account belonging to victim W.D. without victim W.D.'s
3 authorization.

4 45. On or about June 23, 2009, defendant STRONG and co-
5 conspirator Watson provided a fraudulently obtained check from a
6 Bank of America account belonging to victims J.K. and P.K. to
7 co-conspirator L.T.

8 46. On or about June 23, 2009, at the direction of
9 defendant STRONG, co-conspirator L.T. cashed a fraudulently
10 obtained check in the amount of \$6,600 drawn on a Bank of America
11 account belonging to victims J.K. and P.K. at a Bank of America
12 Branch in Los Angeles, California.

13 47. On or about July 22, 2009, defendant GASPARIAN, in a
14 telephone conversation using coded language, provided defendant
15 SHAROPETROSIAN with personal identifying information and Chase
16 Bank account information for victim O.B.

17 48. On or about July 27, 2009, defendant SHAROPETROSIAN, in
18 a telephone conversation using coded language, told an unindicted
19 co-conspirator about an account worth over \$700,000, and that he
20 had been working with defendant BROWN to perpetrate bank fraud on
21 various victim bank accounts.

22
23 49. On or about July 27, 2009, defendant SHAROPETROSIAN, in
24 a telephone conversation using coded language, provided victim
25 K.K.'s social security number to an unindicted co-conspirator,
26 and told the unindicted co-conspirator to obtain victim K.K.'s
27 address.

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1 50. On or about July 28, 2009, defendant BROWN called Chase
2 Bank banking services, provided victim D.D.'s personal
3 identifying information, including victim D.D.'s date of birth
4 and social security number, and ordered checks for victim D.D.'s
5 account.

6 51. On or about July 28, 2009, defendant TANGABAKYAN, in a
7 telephone conversation using coded language, provided defendant
8 SHAROPETROSIAN with victim M.C.'s personal identifying
9 information, including victim M.C.'s address, date of birth, and
10 social security number, and Bank of America account information.

11 52. On or about July 28, 2009, defendant SHAROPETROSIAN, in
12 a telephone conversation using coded language, told defendant
13 TANGABAKYAN that one of victim M.C.'s Bank of America accounts
14 contained approximately \$108,000.

15 53. On or about July 29, 2009, defendants SHAROPETROSIAN
16 and TANGABAKYAN, in a telephone conversation using coded
17 language, discussed stealing checkbooks from the victim-account
18 owners' houses.

19 54. On or about July 30, 2009, defendant COX called Bank of
20 America's check ordering service, falsely represented himself as
21 victim B.N., and ordered checks for a bank account belonging to
22 victims B.N. and K.N. that were later fraudulently cashed.

23 55. On or about July 31, 2009, defendant BROWN called Chase
24 Bank banking services and, while posing as victim A.M., obtained
25 account information for victim A.M.'s bank account and inquired
26 about a recently cashed check.

27 56. In or around August 2009, defendant COX and other co-
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1 conspirators attempted to pick up checkbooks for victim D.D.'s
2 Chase Bank account at a post office box belonging to victim D.D.

3 57. On or about August 1, 2009, defendants SHAROPETROSIAN
4 and TANGABAKYAN, in a telephone conversation using coded
5 language, discussed forging signatures on fraudulent checks.

6 58. On or about August 3, 2009, defendant SHAROPETROSIAN,
7 in a telephone conversation using coded language, discussed with
8 defendant TANGABAKYAN executing bank fraud schemes using
9 computers and telephones, and committing bank fraud against
10 Citibank customers.

11 59. On or about August 3, 2009, defendants SHAROPETROSIAN
12 and MARKOSIAN, in a telephone conversation using coded language,
13 discussed preparing and depositing fraudulent checks drawn from
14 victim M.C.'s Bank of America account.

15 60. On or about August 3, 2009, defendant SHAROPETROSIAN,
16 in a telephone conversation using coded language, told defendant
17 OGANDZHANYAN to tell an unindicted co-conspirator working at
18 Citibank to bring them victim-account information.

19 61. On or about August 4, 2009, defendant BROWN called
20 Chase Bank banking services and, while posing as victim O.B.,
21 ordered new checks for victim O.B.'s bank accounts.

22 62. On or about August 4, 2009, defendant SHAROPETROSIAN,
23 in a telephone conversation using coded language, asked defendant
24 GASPARIAN to provide fraudulently obtained bank checks to
25 defendant MARKOSIAN, and GASPARIAN agreed to do so.

26 63. On or about August 5, 2009, defendant BROWN, in
27 telephone conversations using coded language, told defendant
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1 WADSACK that he would be ordering checks for victim J.L.'s
2 Citibank account and would send WADSACK victim J.L.'s address so
3 that the checks could be picked up the following day and cashed
4 as soon as possible.

5 64. On or about August 5, 2009, defendants BROWN and
6 BENSON, in a telephone conversation using coded language,
7 discussed picking up checks from Chase Bank sent to victim O.B.'s
8 residence.

9 65. On or about August 6, 2009, defendants SHAROPETROSIAN
10 and OGANDZHANYAN, in a telephone conversation using coded
11 language, discussed forging signatures on checks for victim
12 J.L.'s Citibank account that defendant MARKOSIAN would be picking
13 up that same day.

14 66. On or about August 6, 2009, defendant SHAROPETROSIAN,
15 in a telephone conversation using coded language, told defendant
16 MARKOSIAN that a fraudulent check for a Citibank account
17 belonging to victim J.L. would be ready for deposit later that
18 day.

19 67. On or about August 6, 2009, defendant MARKOSIAN, in a
20 telephone conversation using coded language, told defendant
21 SHAROPETROSIAN that he was going to pick up the fraudulent check
22 for victim J.L.'s Citibank account and that the check would be
23 deposited that same day.

24 68. On or about August 6, 2009, defendant OGANDZHANYAN, in
25 a telephone conversation using coded language, told defendant
26 SHAROPETROSIAN that she was able to forge the signature on the
27 fraudulent check for victim J.L.'s Citibank account, and
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1 SHAROPETROSIAN told OGANDZHANYAN to write \$44,000 as the amount
2 on the fraudulent check.

3 69. On or about August 6, 2009, defendant MARKOSIAN, in a
4 telephone conversation using coded language, told defendant
5 SHAROPETROSIAN that the fraudulent check for victim J.L.'s
6 Citibank account was for \$44,000.

7 70. On or about August 6, 2009, in Burbank, California,
8 defendants MARGARYAN and DILBOYAN possessed check number 2117,
9 made payable to "Gagek Karapetyan" in the amount of \$44,730.17,
10 drawn on a Citibank account belonging to victim J.L.

11 71. On or about August 6, 2009, defendant MARKOSIAN, in a
12 telephone conversation using coded language, told defendant
13 SHAROPETROSIAN that police officers had stopped defendants
14 MARGARYAN and DILBOYAN before they deposited the check from
15 victim J.L.'s Citibank account.

16 72. On or about August 6, 2009, defendant COX called Bank
17 of America's check ordering service, falsely represented himself
18 as victim A.C., and ordered checks for victim A.C.'s bank account
19 that were later fraudulently cashed.

20 73. On or about August 7, 2009, defendants BROWN and
21 BENSON, in a telephone conversation using coded language,
22 discussed changing addresses and telephone numbers on victim-
23 accounts, including victim W.D.'s Bank of America account, and
24 transferring funds between accounts.

25 74. On or about August 7, 2009, defendant BROWN, in a
26 telephone conversation using coded language, told defendant
27 BENSON that police officers had stopped defendants MARGARYAN and
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1 DILBOYAN, found a fraudulent check, and called victim J.L.

2 75. On or about August 7, 2009, defendant SHAROPETROSIAN,
3 in a telephone conversation using coded language, told defendant
4 OGANDZHANYAN that police officers had stopped defendants
5 MARGARYAN and DILBOYAN before they could deposit the check from
6 victim J.L.'s Citibank account, but that he would be sending
7 other fraudulently obtained checks to OGANDZHANYAN.

8 76. On or about August 8, 2009, defendants BROWN and COX,
9 in a telephone conversation using coded language, discussed
10 buying victim-account information for victim M.C.

11 77. On or about August 11, 2009, defendant BROWN called
12 Chase Bank customer service and, while posing as victim O.B.,
13 changed the telephone numbers associated with victim O.B.'s bank
14 account.

15 78. On or about August 11, 2009, defendant BROWN called
16 Bank of America customer service and, while posing as victim
17 V.R., ordered checks for a bank account belonging to victims V.R.
18 and M.R.

19 79. On or about August 13, 2009, defendants BROWN and
20 BENSON, in telephone conversations using coded language,
21 coordinated intercepting checkbooks for a Bank of America account
22 belonging to victims V.R. and M.R., and BENSON told BROWN that
23 defendant STRONG had obtained checkbooks from the residence of
24 victims V.R. and M.R.

25 80. On or about August 13, 2009, defendant STRONG took a
26 package containing bank checks from the front of the residence of
27 victims V.R. and M.R. in Corona, California.

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1 81. On or about August 13, 2009, defendant BROWN called a
2 customer service representative for Chase Bank and, while posing
3 as victim K.K., obtained information about victim K.K.'s bank
4 account, including information concerning the account balance and
5 recently cashed checks.

6 82. On or about August 13, 2009, defendants BROWN and
7 BENSON, in telephone conversations using coded language,
8 discussed stealing checks delivered to victim K.K.'s address and
9 taking money from victim K.K.'s Chase Bank account.

10 83. On or about August 13, 2009, defendants BROWN and
11 BENSON, in a telephone conversation using coded language,
12 discussed obtaining bank account information from an unindicted
13 co-conspirator who was a Citibank employee, including information
14 for the accounts of victim P.M. in Michigan and victim R.C. in
15 New Jersey.

16 84. On or about August 13, 2009, defendant SHAROPETROSIAN,
17 in a telephone conversation using coded language, told defendant
18 MARKOSIAN that he would ask defendant GASPARIAN to forge the
19 signature on a bank check and provide the check to MARKOSIAN,
20 that there was \$436,000 in the account relating to the bank
21 check, and that he wanted to take the money out of the account in
22 three to four transactions.

23 85. On or about August 13, 2009, defendant GASPARIAN, in a
24 telephone conversation using coded language, told defendant
25 SHAROPETROSIAN that she would forge the signature on a bank check
26 and provide it to defendant MARKOSIAN, and SHAROPETROSIAN said
27 MARKOSIAN would make the check out for \$80,000.

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1 86. On or about August 14, 2009, defendants BROWN and
2 BENSON, in a telephone conversation using coded language,
3 discussed obtaining checks for victim J.B.'s Chase Bank account
4 and avoiding detection by law enforcement.

5 87. On or about August 14, 2009, defendant COX, in a
6 telephone conversation using coded language, provided defendant
7 BROOKS with a social security number for victim M.C. and a
8 separate Bank of America account number and asked BROOKS if she
9 could obtain information for that account.

10 88. On or about August 14, 2009, defendants BROWN and BELL,
11 in a telephone conversation using coded language, discussed
12 victim M.C.'s Bank of America account, and BELL agreed to meet
13 defendant COX to provide him with information related to victim
14 M.C.'s Bank of America account.

15 89. On or about August 15, 2009, defendants BROWN and
16 WADSACK, in a telephone conversation using coded language,
17 discussed victim M.C.'s Bank of America account.

18 90. On or about August 15, 2009, defendant BROWN, in a
19 telephone conversation using coded language, told defendant
20 SHAROPETROSIAN that he had obtained information for a high-value
21 bank account and that he was working on stealing money from
22 victim R.C.'s Bank of America account.

23 91. On or about August 16, 2009, defendant BROWN called
24 Chase Bank banking services and, while posing as victim P.M.,
25 obtained balances on victim P.M.'s bank accounts.

26 92. On or about August 17, 2009, defendant BROWN called
27 customer service at Chase Bank and, while posing as victim J.B.,
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1 ordered checks for victim J.B.'s bank account.

2 93. On or about August 17, 2009, defendant WADSACK, in a
3 telephone conversation using coded language, gave defendant BROWN
4 victim R.V.'s personal identifying information, including victim
5 R.V.'s name, address, phone number, date of birth, social
6 security number, and mother's maiden name, and told BROWN that
7 victim R.V.'s Citibank accounts contained \$40,000.

8 94. On or about August 17, 2009, defendant BROWN called
9 Citibank banking services, provided personal identifying
10 information for victim R.V., and attempted to learn the balances
11 on victim R.V.'s bank accounts.

12 95. On or about August 18, 2009, defendant BENSON, in
13 telephone conversations using coded language, told defendant
14 BROWN that he had picked up checks for victim J.B.'s Chase Bank
15 account, and BROWN and BENSON discussed changing information for
16 victim J.B.'s bank accounts and forging victim J.B.'s signature
17 on the checks.

18 96. On or about August 18, 2009, defendants BROWN and
19 WADSACK, in a telephone conversation using coded language,
20 discussed checks for victim J.B.'s Chase Bank account, and BROWN
21 gave WADSACK victim J.B.'s personal identification number.

22 97. On or about August 19, 2009, defendants BROWN and
23 BENSON, in a telephone conversation using coded language,
24 discussed ordering checks for victim P.M.'s Chase Bank account.

25 98. On or about August 19, 2009, defendants SHAROPETROSIAN
26 and MARKOSIAN, in a telephone conversation using coded language,
27 discussed victim N.A.'s Bank of America account, and MARKOSIAN
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1 stated that they should try to withdraw approximately \$45,000
2 from victim N.A.'s account and that it would take two to three
3 days to withdraw the money.

4 99. On or about August 19, 2009, defendant BROWN attempted
5 to transfer funds between victim J.B.'s bank accounts by calling
6 Chase Bank banking services.

7 100. On or about August 19, 2009, in a telephone
8 conversation using coded language, defendants BROWN, BENSON, and
9 WADSACK discussed obtaining information for victim R.C.'s Bank of
10 America accounts and ordering checks for other accounts.

11 101. On or about August 19, 2009, defendants BROWN and
12 WADSACK, in a telephone conversation using coded language,
13 discussed a check fraudulently drawn on victim J.B.'s Citibank
14 bank account.

15 102. On or about August 20, 2009, in a telephone
16 conversation using coded language, defendant SHAROPETROSIAN
17 obtained account numbers for victim N.A.'s Bank of America
18 accounts from an unindicted co-conspirator, who also told
19 SHAROPETROSIAN that the accounts contained over \$200,000.

20 103. On or about August 20, 2009, defendant SHAROPETROSIAN,
21 in a telephone conversation using coded language, told an
22 unindicted co-conspirator that he wanted to target victim-
23 accounts in the \$400,000 to \$500,000 range, and that he had set
24 up a good bank fraud scheme with another prison inmate.

25 104. On or about August 20, 2009, defendant SHAROPETROSIAN,
26 in a telephone conversation using coded language, obtained from
27 an unindicted co-conspirator personal identifying information for
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1 victims K.W.K. and H.K., including their names, address,
2 telephone numbers, social security numbers, Chase Bank account
3 numbers, and account balances.

4 105. On or about August 21, 2009, defendants BROWN and
5 BENSON, in a telephone conversation using coded language,
6 discussed obtaining account information from an unidentified bank
7 employee at Citibank, and BROWN stated that he needed information
8 regarding victim R.V.'s bank account.

9 106. On or about August 25, 2009, defendants BROWN and
10 WADSACK, in a telephone conversation using coded language,
11 discussed victim K.W.K.'s name and social security number and
12 obtaining a date of birth for victim K.W.K., and BROWN also told
13 WADSACK that he had changed information for victim P.M.'s Chase
14 Bank account and victim R.C.'s Bank of America account.

15 107. On or about August 25, 2009, defendants BROWN and
16 BENSON, in a telephone conversation using coded language,
17 discussed personal identifying information, including names and
18 social security numbers associated with victims K.W.K. and H.K.,
19 and further discussed the distribution of proceeds from the fraud
20 scheme.

21 108. On or about August 26, 2009, defendant SHAROPETROSIAN,
22 in a telephone conversation using coded language, obtained from
23 an unindicted co-conspirator victim N.A.'s personal identifying
24 information and Bank of America account information.

25 109. On or about August 27, 2009, defendant BROWN, in
26 telephone conversations using coded language, provided defendant
27 BELL with detailed instructions for ordering checks for victim
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1 N.A.'s Bank of America accounts.

2 110. On or about August 27, 2009, defendants BROWN and
3 BENSON, in a telephone conversation using coded language,
4 exchanged victim M.J.'s name and Bank of America account number,
5 and discussed ordering and writing fraudulent checks on victim
6 M.J.'s Bank of America account.

7 111. On or about August 27, 2009, an unindicted
8 co-conspirator attempted to cash a check in the amount of
9 \$3,900, drawn on victim M.J.'s Bank of America account, in Las
10 Vegas, Nevada.

11 112. On or about August 28, 2009, defendants SHAROPETROSIAN
12 and OGANDZHANYAN, in a telephone conversation using coded
13 language, discussed writing fraudulent checks for victim bank
14 accounts.

15 113. On or about August 30, 2009, defendant GASPARIAN, in a
16 telephone conversation using coded language, told defendant
17 SHAROPETROSIAN that an unindicted co-conspirator had delivered
18 bank checks to her, and SHAROPETROSIAN said that defendant
19 MARKOSIAN would come to pick up the checks from her.

20 114. On or about August 30, 2009, an unindicted co-
21 conspirator, in a telephone conversation using coded language,
22 told defendant SHAROPETROSIAN that he had left a book of bank
23 checks with defendant GASPARIAN.

24 115. On or about August 30, 2009, defendant SHAROPETROSIAN,
25 in a telephone conversation using coded language, provided
26 defendant OGANDZHANYAN with personal identifying information,
27 including the address, social security number, and bank account
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1 information, for victim N.A., and SHAROPETROSIAN instructed
2 OGANDZHANYAN to call Bank of America customer service and
3 impersonate victim N.A. in order to obtain account balance
4 information for victim N.A.

5 116. On or about August 31, 2009, defendant BROWN called
6 Chase Bank customer service, placed an order for new checks for a
7 bank account belonging to victims K.W.K. and H.K., and requested
8 that the checks start at check number 763.

9 117. On or about August 31, 2009, defendant BROWN called
10 Bank of America customer service and obtained the routing number
11 for victim R.C.'s bank accounts.

12 118. On or about August 31, 2009, defendant SHAROPETROSIAN,
13 in a telephone conversation using coded language, complained to
14 defendant WADSACK about several bank accounts that had gone bad,
15 and SHAROPETROSIAN told WADSACK that he wanted them to work
16 together and that he uses his medical business to launder the
17 proceeds of the fraud scheme.

18 119. On or about August 31, 2009, defendants BROWN and BELL,
19 in a telephone conversation using coded language, discussed
20 various account numbers, and exchanged victim B.G.'s name and
21 social security number.

22 120. On or about August 31, 2009, defendant BROWN, in a
23 telephone conversation using coded language, provided defendant
24 BELL with victim W.D.'s personal identifying information and Bank
25 of America account number.

26 121. On or about September 7, 2009, defendants BROWN and
27 BENSON, in a telephone conversation using coded language,
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1 discussed committing bank fraud and unlawfully withdrawing money
2 from the Chase Bank account of victims K.W.K. and H.K.

3 122. On or about September 10, 2009, defendants BROWN and
4 BENSON, in a telephone conversation using coded language,
5 discussed stealing checks from the residence of victims K.W.K.
6 and H.K., and BENSON said he was in the vicinity of the residence
7 of victims K.W.K. and H.K. waiting for the checks to arrive.

8 123. On or about September 10, 2009, defendant BENSON stole
9 a package containing bank checks for the Chase Bank account of
10 victims K.W.K. and H.K. from the residence of victims K.W.K. and
11 H.K.

12 124. On or about September 10, 2009, defendant BENSON, in a
13 telephone conversation using coded language, told defendant BROWN
14 that he was being pursued by police officers after stealing bank
15 checks from the residence of victims K.W.K. and H.K. and was
16 driving at a speed of approximately 100 miles per hour, and BROWN
17 told BENSON to try to outrun the police officers and to destroy
18 the checks.

19 125. On or about September 10, 2009, defendant BROWN, in
20 telephone conversations using coded language, spoke with
21 defendants BELL and WADSACK regarding defendant BENSON's arrest,
22 and BROWN stated that if police officers question BROWN, BROWN
23 would deny everything.

24 126. On or about October 28, 2009, defendant COX called Bank
25 of America's check ordering service, falsely represented himself
26 as victim A.K., and ordered checks for one of victim A.K.'s bank
27 accounts.

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1 127. On or about October 29, 2009, defendant WADSACK and co-
2 conspirator Watson provided a fraudulently obtained check from a
3 Bank of America account belonging to victims J.R.W. and J.L.W. to
4 co-conspirator J.S.

5 128. On or about October 29, 2009, at the direction of
6 defendant WADSACK and co-conspirator Watson, co-conspirator J.S.
7 cashed a fraudulently obtained check in the amount of \$5,500
8 drawn on a Bank of America account belonging to victims J.R.W.
9 and J.L.W. at a Bank of America branch in Santa Ana, California.

10 129. On or about February 3, 2010, defendant CHATTON
11 provided a fraudulently obtained check from a Bank of America
12 account belonging to victim E.R. to co-conspirator A.U.

13 130. On or about February 3, 2010, at the direction of
14 defendant CHATTON, co-conspirator A.U. cashed a check in the
15 amount of \$6,000 drawn on a Bank of America account belonging to
16 victim E.R. at a Bank of America branch in North Hollywood,
17 California.

18 131. On or about February 11, 2010, defendants WADSACK and
19 CHATTON, and co-conspirator Watson, provided a fraudulently
20 obtained check from a Bank of America account belonging to victim
21 A.W. to co-conspirator A.U. in Las Vegas, Nevada.

22 132. On or about February 11, 2010, at the direction of
23 defendants WADSACK and CHATTON, co-conspirator A.U. cashed a
24 check in the amount of \$2,900 drawn on a Bank of America account
25 belonging to victim A.W. in Las Vegas, Nevada.

26 133. On or about March 4, 2010, defendants WADSACK and
27 RUTANHIRA, and co-conspirator Watson, provided fraudulently
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1 obtained checks from a Bank of America account belonging to
2 victim C.M. to co-conspirator J.N.R. in Phoenix, Arizona.

3 134. On or about March 4, 2010, at the direction of
4 defendant RUTANHIRA, co-conspirator J.N.R. cashed two
5 fraudulently obtained checks in the amounts of \$3,000 and \$3,900
6 drawn on a Bank of America account belonging to victim C.M. in
7 Phoenix, Arizona.

8 135. On or about March 8, 2010, defendants WADSACK and
9 RUTANHIRA, and co-conspirator Watson, provided a fraudulently
10 obtained check from a Bank of America account belonging to
11 victims M.S. and D.D. to co-conspirator S.D. in Phoenix, Arizona.

12 136. On or about March 8, 2010, at the direction of
13 defendant RUTANHIRA, co-conspirator S.D. cashed a fraudulently
14 obtained check in the amount of \$5,300 drawn on a Bank of America
15 account belonging to victims M.S. and D.D. in Phoenix, Arizona.

16 137. On or about April 6, 2010, defendant CHATTON cashed a
17 fraudulently obtained check in the amount of \$4,000 drawn on a
18 Bank of America account belonging to victim A.S. at a Bank of
19 America branch in Reseda, California.

20 138. On or about April 6, 2010, defendant CHATTON provided
21 fraudulently obtained checks from Bank of America accounts
22 belonging to victim A.S. and victim S.O. to co-conspirator L.R.

23 139. On or about April 6, 2010, at the direction of
24 defendant CHATTON, co-conspirator L.R. cashed a fraudulently
25 obtained check in the amount of \$6,800 drawn on a Bank of America
26 account belonging to victim A.S. at a Bank of America branch in
27 Northridge, California.

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1 140. On or about April 9, 2010, at the direction of
2 defendant CHATTON, co-conspirator L.R. cashed a fraudulently
3 obtained check in the amount of \$5,000 drawn on a Bank of America
4 account belonging to victim S.O. at a Bank of America branch in
5 Fullerton, California.

6 141. On or about April 23, 2010, defendant CHATTON provided
7 a fraudulently obtained check from a Bank of America account
8 belonging to victim B.G. to co-conspirator K.M.

9 142. On or about April 23, 2010, at the direction of
10 defendant CHATTON, co-conspirator K.M. cashed a fraudulently
11 obtained check in the amount of \$3,500 drawn on a Bank of America
12 account belonging to victim B.G. at a Bank of America branch in
13 Anaheim, California.

14 143. On or about April 26, 2010, defendant HASKELL cashed a
15 fraudulently obtained check in the amount of \$3,900 drawn on a
16 Bank of America account belonging to victims D.S. and L.S. at a
17 Bank of America branch in Thousand Oaks, California.

18 144. On or about May 7, 2010, defendant CHATTON provided a
19 fraudulently obtained check from a Bank of America account
20 belonging to victims L.C. and V.C. to co-conspirator G.C.

21 145. On or about May 7, 2010, at the direction of defendant
22 CHATTON, co-conspirator G.C. cashed a fraudulently obtained check
23 in the amount of \$5,000 drawn on a Bank of America account
24 belonging to victims L.C. and V.C. at a Bank of America branch in
25 Huntington Beach, California.

26 146. On or about June 5, 2010, defendant HASKELL recruited
27 co-conspirator J.H. to cash a fraudulently obtained check.

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1 147. On or about June 5, 2010, defendant CHATTON and co-
2 conspirator Watson provided a fraudulently obtained check from a
3 Bank of America account belonging to victims P.G. and C.N. to co-
4 conspirator J.H.

5 148. On or about June 5, 2010, at the direction of defendant
6 CHATTON, co-conspirator J.H. cashed a fraudulently obtained check
7 in the amount of \$3,600 drawn on a Bank of America account
8 belonging to victims P.G. and C.N. at a Bank of America branch in
9 Anaheim, California.

10 149. On or about June 9, 2010, defendant HASKELL recruited
11 co-conspirator H.D. to cash a fraudulently obtained check.

12 150. On or about June 9, 2010, defendants CHATTON and
13 HASKELL provided two fraudulently obtained checks from a Bank of
14 America account belonging to victim M.J. to co-conspirator H.D.

15 151. On or about June 9, 2010, at the direction of defendant
16 CHATTON, co-conspirator H.D. cashed two fraudulently obtained
17 checks in the amounts of \$2,500 and \$4,990 drawn on a Bank of
18 America account belonging to victim M.J. at Bank of America
19 branches in Fullerton and Brea, California.

20 152. On or about June 24, 2010, defendant BROOKS accessed
21 account information for the Bank of America account of victims
22 E.H. and N.H., and BROOKS provided this account information to
23 defendant COX.

24 153. On or about July 9, 2010, defendant RUTANHIRA provided
25 fraudulently obtained checks from Bank of America accounts
26 belonging to victims R.C. and S.C. and victim J.W. to co-
27 conspirator C.R.

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1 154. On or about July 9, 2010, at the direction of defendant
2 RUTANHIRA, co-conspirator C.R. cashed a fraudulently obtained
3 check in the amount of \$3,393 drawn on a Bank of America account
4 belonging to victims R.C. and S.C., and a fraudulently obtained
5 check in the amount of \$3,500 drawn on a Bank of America account
6 belonging to victim J.W., at Bank of America branches in Los
7 Angeles and Carson, California.

8 155. On or about November 22, 2010, defendant HAWKINS called
9 Bank of America's check ordering service, falsely represented
10 himself as victim M.G., and ordered checks for victim M.G.'s bank
11 account.

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COUNTS TWO THROUGH FORTY-TWO

[18 U.S.C. §§ 1344, 2]

A. INTRODUCTORY ALLEGATIONS

1. The Grand Jury realleges and incorporates herein by reference the General Allegations and Definitions of this Indictment, as though fully set forth herein.

B. THE FRAUDULENT SCHEME

2. The Grand Jury hereby incorporates and re-alleges by reference Paragraphs 2 and 3 in Count One of this Indictment.

C. THE EXECUTION OF THE SCHEME

3. To execute the above-described fraudulent scheme, on or about the below-specified dates, within the Central District of California, and elsewhere, defendants SHAROPETROSIAN, BROWN, WADSACK, COX, MARKOSIAN, OGANDZHANYAN, TANGABAKYAN, GASPARIAN, MARGARYAN, DILBOYAN, BENSON, SMITH, YOUNG, HAWKINS, STRONG, BELL, BROOKS, RUTANHIRA, CHATTON, and HASKELL, while aiding and abetting each other, and together with others known and unknown to the Grand Jury, committed and attempted to commit, and willfully caused to be committed and attempted to be committed, the following acts, among others, in and affecting interstate commerce, each of which constituted an execution and attempted execution of the fraudulent scheme:

COUNT	DATE	ACT
TWO	5/16/05	Cashing of check number 2261, made payable to "Jessica Bacque" in the amount of \$8,500, drawn on Bank of America account number xxxxxx-0669, belonging to victims J.V. and T.V.

1	THREE	5/23/05	Cashing of check number 5285, made payable to "Jessica Bacque" in the amount of \$8,150, drawn on Bank of America account number xxxxxx-3721, belonging to victim L.B.
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4	FOUR	9/16/05	Deposit of check number 11386, made payable to "Jesse's Horse Training" in the amount of \$35,500, drawn on Bank of America account number xxxxxx-5725, belonging to victim K.R.
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7	FIVE	9/20/05	Cashing of check number 11399, made payable to "Guadalupe Mendoza" in the amount of \$8,350, drawn on Bank of America account number xxxxxx-5725, belonging to victim K.R.
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10	SIX	11/2/06	Cashing of check number 1198, made payable to "Luther Leter" in the amount of \$6,600, drawn on Bank of America account number xxxxxx-1674, belonging to victims H.B. and L.B.
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12			
13	SEVEN	7/13/07	Attempted cashing of check number 178, made payable to "Kayla Dirks" in the amount of \$5,900, drawn on Bank of America account number xxxxxx-3631, belonging to victim H.S.
14			
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16	EIGHT	9/4/08	Cashing of check number 6083, made payable to "Alphonzo Strong" in the amount of \$6,800, drawn on Bank of America account number xxxxxx-7378, belonging to victims S.K. and L.K.
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19	NINE	9/4/08	Cashing of check number 6084, made payable to "Alphonzo Strong" in the amount of \$8,900, drawn on Bank of America account number xxxxxx-7378, belonging to victims S.K. and L.K.
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22	TEN	12/9/08	Check reorder for Bank of America account number xxxxxx-2107, belonging to victim C.B.
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24	ELEVEN	4/8/09	Check reorder for Bank of America account number xxxxxx-2549, belonging to victim G.D.
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1	TWELVE	4/20/09	Cashing of check number 1113, made payable to "Amanda Schenden" in the amount of \$2,795.50, drawn on Bank of America account number xxxxxx-6027, belonging to victim H.G.A.
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4	THIRTEEN	4/20/09	Cashing of check number 1114, made payable to "Amanda Schenden" in the amount of \$3,917.85, drawn on Bank of America account number xxxxxx-6027, belonging to victim H.G.A.
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7	FOURTEEN	5/7/09	Cashing of check number 147, made payable to "Justine Rivera" in the amount of \$5,100, drawn on Bank of America account number xxxxxx-1345, belonging to victim S.L.
8			
9			
10	FIFTEEN	5/8/09	Cashing of check number 148, made payable to "Andrew Sedillos" in the amount of \$6,100, drawn on Bank of America account number xxxxxx-1345, belonging to victim S.L.
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13	SIXTEEN	5/14/09	Cashing of check number 2918, made payable to "Vanessa Flores" in the amount of \$6,340, drawn on Bank of America account number xxxxxx-1305, belonging to victims J.C. and C.C.
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16	SEVENTEEN	5/15/09	Cashing of check number 2470, made payable to "Justine Rivera" in the amount of \$5,000, drawn on Bank of America account number xxxxxx-1802, belonging to victims G.L. and T.L.
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19	EIGHTEEN	6/1/09	Cashing of check number 1779, made payable to "Vanessa Flores" in the amount of \$5,000, drawn on Bank of America account number xxxxxx-0669, belonging to victims A.S. and J.S.
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21			
22	NINETEEN	6/4/09	Cashing of check number 2372, made payable to "Vincent Razo" in the amount of \$7,423, drawn on Bank of America account number xxxxxx-5284, belonging to victims H.J.B. and H.S.B.
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25	TWENTY	6/5/09	Cashing of check number 2405, made payable to "Maurice Goodloe" in the amount of \$5,000, drawn on Bank of America account number xxxxxx-5284, belonging to victims H.J.B. and H.S.B.
26			
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1	TWENTY-ONE	6/23/09	Cashing of check number 8600, made payable to "Lanee Tang" in the amount of \$6,600, drawn on Bank of America account number xxxxxx-2006, belonging to victims J.K. and P.K.
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4	TWENTY-TWO	7/28/09	Check reorder for Chase Bank account number xxxxxx-7634, belonging to victim D.D.
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6	TWENTY-THREE	7/30/09	Check reorder for Bank of America account number xxxxxx-3449, belonging to victims B.N. and K.N.
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8	TWENTY-FOUR	8/4/09	Check reorder for Chase Bank account number xxxxxx-3409, belonging to victim O.B.
9			
10	TWENTY-FIVE	8/6/09	Attempted cashing and deposit of check number 2117, made payable to "Gagik Karapetyan" in the amount of \$44,730.17, drawn on Citibank account number xxx-xxx-3182, belonging to victim J.L.
11			
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13	TWENTY-SIX	8/10/09	Check reorder for Bank of America account number xxxxxx-8980, belonging to victim A.C.
14			
15	TWENTY-SEVEN	8/11/09	Check reorder for Bank of America account number xxxxxx-2941, belonging to victims V.R. and M.R.
16			
17	TWENTY-EIGHT	8/17/09	Check reorder for Chase Bank account number xxxxxx-4648, belonging to victim J.B.
18			
19	TWENTY-NINE	8/19/09	Attempted transfer of all funds from a Chase Bank CD account belonging to victim J.B., to Chase Bank checking account number xxxxxx-4648, also belonging to victim J.B.
20			
21			
22	THIRTY	8/27/09	Check reorder for Bank of America account number xxxxxx-6170, belonging to victim N.A.
23			
24	THIRTY-ONE	8/31/09	Check reorder for Chase Bank account number xxxxxx-9373, belonging to victims K.W.K. and H.K.
25			
26	THIRTY-TWO	10/28/09	Check reorder for Bank of America account number xxxxxx-4138, belonging to victim A.K.
27			
28			

1	THIRTY-THREE	10/29/09	Cashing of check number 6009, made payable to "Jennifer Spinosa" in the amount of \$5,500, drawn on Bank of America account number xxxxxx-5419, belonging to victims J.R.W. and J.L.W.
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4	THIRTY-FOUR	4/6/10	Cashing of check number 553, made payable to "Lisa Raynes" in the amount of \$6,800, drawn on Bank of America account number xxxxxx-0810, belonging to victim A.S.
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7	THIRTY-FIVE	4/6/10	Cashing of check number 559, made payable to "Derrick Chatton" in the amount of \$4,000, drawn on Bank of America account number xxxxxx-0810, belonging to victim A.S.
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10	THIRTY-SIX	4/23/10	Cashing of check number 304, made payable to "Kyle Myers" in the amount of \$3,500, drawn on Bank of America account number xxxxxx-2156, belonging to victim B.G.
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13	THIRTY-SEVEN	4/26/10	Cashing of check number 8932, made payable to "Robert Haskell" in the amount of \$3,900, drawn on Bank of America account number xxxxxx-4177, belonging to victims D.S. and L.S.
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16	THIRTY-EIGHT	5/7/10	Cashing of check number 194, made payable to "Gary Chapin" in the amount of \$5,000, drawn on Bank of America account number xxxxxx-6110, belonging to victims V.C. and L.C.
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19	THIRTY-NINE	6/5/10	Cashing of check number 2465, made payable to "Jason Hogan" in the amount of \$3,600, drawn on Bank of America account number xxxxxx-9203, belonging to victims P.G. and C.N.
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22	FORTY	6/9/10	Cashing of check number 1005, made payable to "Haley Dobson" in the amount of \$4,990, drawn on Bank of America account number xxxxxx-7406, belonging to victim M.J.
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25	FORTY-ONE	7/9/10	Cashing of check number 8629, made payable to "Carlee Rodriguez" in the amount of \$3,393, drawn on Bank of America account number xxxxxx-1699, belonging to victims R.C. and S.C.
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FORTY-TWO	11/22/10	Check reorder for Bank of America account number xxxxxx-1974, belonging to victim M.G.
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COUNTS FORTY-THREE THROUGH NINETY-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 Conspiracy to Commit Bank Fraud, a felony violation of Title 18, United States Code, Section 1349, as charged in Count One of this Indictment, and Bank Fraud, a felony violation of Title 18, United States Code, Section 1344, as charged in Counts Two through Forty-Two of this Indictment:

COUNT	DATE	DEFENDANT(S)	MEANS OF IDENTIFICATION
FORTY-THREE	11/1/06	ANTHONY HAWKINS ("HAWKINS")	Name and Account Number of victims H.B. and L.B.
FORTY-FOUR	9/4/08	ALPHONZO STRONG, aka "Trub" ("STRONG")	Name and Account Number of victims S.K. and L.K.
FORTY-FIVE	9/4/08	STRONG	Name and Account Number of victims S.K. and L.K.
FORTY-SIX	4/8/09	LEWELLYN CHARLES COX IV, aka "Showtime," aka "Showtyme," aka "Sho" ("COX")	Name and Account Number of victim G.D.
FORTY-SEVEN	4/20/09	HAWKINS	Name and Account Number of victim H.G.A.

COUNT	DATE	DEFENDANT(S)	MEANS OF IDENTIFICATION
FORTY-EIGHT	4/28/09	RONALD SMITH, aka "Ski," aka "Skeet" ("SMITH")	Name and Account Number of victim C.F.
FORTY-NINE	5/7/09	KEVIN YOUNG, aka "Keley Bluez" ("YOUNG")	Name and Account Number of victim S.L.
FIFTY	5/14/09	YOUNG	Name and Account Number of victims J.C. and C.C.
FIFTY-ONE	5/15/09	YOUNG	Name and Account Number of victims G.L. and T.L.
FIFTY-TWO	6/1/09	YOUNG; SMITH	Name and Account Number of victims A.S. and J.S.
FIFTY-THREE	6/4/09	DAMIAN WADSACK, aka "Nephew," aka "Neff" ("WADSACK")	Name and Account Number of victims H.J.B. and H.S.B.
FIFTY-FOUR	6/5/09	STRONG	Name and Account Number of victims H.J.B. and H.S.B.
FIFTY-FIVE	7/22/09	ARMAN SHAROPETROSIAN, aka "Horse," aka "Dzi" ("SHAROPETROSIAN"); VERGINE GASPARIAN, aka "Vikush"	Name, Telephone Number, Date of Birth, and Social Security Number of victim O.B.
FIFTY-SIX	7/27/09	SHAROPETROSIAN	Name and Social Security Number of victim K.K.
FIFTY-SEVEN	7/28/09	ANGUS BROWN, aka "Homicide," aka "Cide," aka "Cy" ("BROWN"); COX	Name, Date of Birth, and Social Security Number of victim D.D.

COUNT	DATE	DEFENDANT(S)	MEANS OF IDENTIFICATION
FIFTY-EIGHT	7/28/09	SHAROPETROSIAN; OGANES TANGABAKYAN, aka "Hovo," aka "Hovo Spito"; KAREN MARKOSIAN, aka "Kar," aka "Garen" ("MARKOSIAN")	Name, Telephone Number, Date of Birth, Social Security Number, Mother's Maiden Name, and Account Numbers of victim M.C.
FIFTY-NINE	7/30/09	COX	Name and Account Number of victims B.N. and K.N.
SIXTY	8/2/09	BROWN	Name, Date of Birth, Social Security Number, and Account Numbers of victim A.M.
SIXTY-ONE	8/4/09	BROWN	Name, Date of Birth, Social Security Number, and Account Number of victim O.B.
SIXTY-TWO	8/5/09	KELLY BENSON, aka "K" ("BENSON"); WADSACK	Name and Birth Year of victim O.B.
SIXTY-THREE	8/6/09	COX	Name and Account Number of victim A.C.
SIXTY-FOUR	8/6/09	SHAROPETROSIAN; BROWN; KRISTINE OGANDZHANYAN, aka "Krist," aka "Kristik" ("OGANDZHANYAN"); MARKOSIAN; WADSACK; BENSON; ARTUSH MARGARYAN; HOVHANNES DILBOYAN, aka "Andrankik Harutyunyan"	Name, Signature, and Account Number of victim J.L.

COUNT	DATE	DEFENDANT(S)	MEANS OF IDENTIFICATION
SIXTY-FIVE	8/11/09	BROWN; BENSON; WADSACK	Names, Telephone Number, Social Security Numbers, and Account Number of victims V.R. and M.R.
SIXTY-SIX	8/13/09	BROWN	Name, Date of Birth, and Social Security Number of victim K.K.
SIXTY-SEVEN	8/14/09	BROWN; FAYE BELL ("BELL"); COX; NIKKIA BROOKS ("BROOKS")	Name, Mother's Maiden Name, Date of Birth, Social Security Number, and Account Numbers of victim M.C.
SIXTY-EIGHT	8/16/09	BROWN	Name, Date of Birth, and Social Security Number of victim P.M.
SIXTY-NINE	8/17/09	BROWN; WADSACK	Name, Telephone Number, Mother's Maiden Name, Date of Birth, and Social Security Number of victim R.V.
SEVENTY	8/17/09	BROWN	Name, Date of Birth, Social Security Number, and Account Number of victim J.B.
SEVENTY-ONE	8/18/09	BENSON	Name, Account Number, and Signature of victim J.B.
SEVENTY-TWO	8/18/09	WADSACK	Name, Account Number, and Personal Identification Number of victim J.B.

COUNT	DATE	DEFENDANT(S)	MEANS OF IDENTIFICATION
SEVENTY-THREE	8/20/09	SHAROPETROSIAN	Name, Telephone Number, Social Security Number, and Account Numbers of victim K.W.K.
SEVENTY-FOUR	8/20/09	SHAROPETROSIAN	Name, Telephone Number, and Social Security Number of victim H.K.
SEVENTY-FIVE	8/25/09	BROWN; BENSON; WADSACK	Name and Social Security Number of victim K.W.K.
SEVENTY-SIX	8/25/09	BROWN; BENSON; WADSACK	Name and Social Security Number of victim H.K.
SEVENTY-SEVEN	8/26/09	SHAROPETROSIAN	Name, Mother's Maiden Name, Date of Birth, Social Security Number, and Account Numbers of victim N.A.
SEVENTY-EIGHT	8/27/09	BROWN; BELL	Name and Account Number of victim N.A.
SEVENTY-NINE	8/27/09	BROWN; BENSON	Name and Account Number of victim M.J.
EIGHTY	8/30/09	OGANDZHANYAN	Name, Telephone Number, Mother's Maiden Name, Date of Birth, Social Security Number, Access Code, and Account Numbers of victim N.A.
EIGHTY-ONE	8/31/09	BROWN; BELL	Name and Social Security Number of victim B.G.
EIGHTY-TWO	8/31/09	BROWN; BELL	Name, Social Security Number, and Account Number of victim W.D.

COUNT	DATE	DEFENDANT(S)	MEANS OF IDENTIFICATION
EIGHTY-THREE	8/31/09	BROWN	Name of victim R.C.
EIGHTY-FOUR	9/10/09	BENSON	Social Security Number of victim V.R.
EIGHTY-FIVE	9/10/09	BENSON	Name and Account Number of victim A.T.
EIGHTY-SIX	9/10/09	BENSON	Name and Telephone Number of victim K.W.K.
EIGHTY-SEVEN	9/10/09	BENSON	Name, Telephone Number, Mother's Maiden Name, Date of Birth, Social Security Number, and Account Number of victim R.C.
EIGHTY-EIGHT	9/10/09	BENSON	Name, Date of Birth, Social Security Number, and Account Number of victim P.M.
EIGHTY-NINE	9/10/09	BENSON	Name, Date of Birth, Social Security Number, Signature, and Account Number of victim J.B.
NINETY	10/28/09	COX	Name and Account Number of victim A.K.
NINETY-ONE	4/6/10	DERRICK CHATTON, aka "Doc," aka "Dr." ("CHATTON")	Name and Account Number of victim A.S.
NINETY-TWO	4/26/10	ROBERT HASKELL ("HASKELL")	Name and Account Number of victims D.S. and L.S.
NINETY-THREE	6/5/10	CHATTON; HASKELL	Name and Account Number of victims P.G. and C.N.

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COUNT	DATE	DEFENDANT(S)	MEANS OF IDENTIFICATION
NINETY-FOUR	6/24/10	BROOKS	Names, Account Number, Dates of Birth, and Social Security Numbers of victims E.H. and N.H.
NINETY-FIVE	7/9/10	HYWORTH RUTANHIRA, aka "Ike" ("RUTANHIRA")	Name and Account Number of victims R.C. and S.C.
NINETY-SIX	7/9/10	RUTANHIRA	Name and Account Number of victim J.W.
NINETY-SEVEN	11/22/10	HAWKINS	Name and Account Number of victim M.G.

COUNT NINETY-EIGHT

[18 U.S.C. § 1029(a)(3)]

On or about August 6, 2009, in Los Angeles County, within the Central District of California, defendant HOVHANNES DILBOYAN, also known as "Andrankik Harutyunyan," knowingly and with intent to defraud possessed fifteen or more counterfeit and unauthorized access devices, as defined in Title 18, United States Code, Sections 1029(e)(1), (2), and (3), namely, approximately 1,132 debit card numbers, bank account numbers, and credit card numbers in the names of other persons, with said possession affecting interstate and foreign commerce.

1 COUNTS NINETY-NINE THROUGH ONE HUNDRED AND TWO

2 [18 U.S.C. § 1028A(a)(1)]

3 On or about August 6, 2009, in Los Angeles County, within
4 the Central District of California, and elsewhere, defendant
5 HOVHANNES DILBOYAN, also known as "Andrankik Harutyunyan,"
6 knowingly possessed and used, without lawful authority, a means
7 of identification of another person, as specified below, during
8 and in relation to Access Device Fraud, a felony violation of
9 Title 18, United States Code, Section 1029(a)(3), as charged in
10 Count Ninety-Eight of this Indictment:

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COUNT	MEANS OF IDENTIFICATION
NINETY-NINE	Name and Account Number of victims R.D. and S.D.
ONE HUNDRED	Name, Date of Birth, Social Security Number, and Account Number of victim T.S.
ONE HUNDRED AND ONE	Name and Account Number of victim A.M.
ONE HUNDRED AND TWO	Name and Account Number of victim T.G.W.C.

A TRUE BILL

IS/

 Foreperson

ANDRÉ BIROTTE JR.
 United States Attorney

R. E. Dugdale
 ROBERT E. DUGDALE
 Assistant United States Attorney
 Chief, Criminal Division

ELIZABETH R. YANG
 Assistant United States Attorney
 Chief, Violent & Organized Crime Section

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 SARAH LEVITT
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 STEPHEN G. WOLFE
 Assistant United States Attorneys

CRISTINA MORENO
 Department of Justice Trial Attorney
 Organized Crime and Racketeering Section