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2			SEP 1 6 2014
3			CLERK U S DISTRICT COURT DISTRICT OF ARIZONA
4			S A DEPUTY
5		v	
6	IN THE UNITED STA	TES DI	STRICT COURT
7	FOR THE DISTR	ICT OF	
8	United States of America,	NO:	CR-14-1245-PHX-GMS (BSB)
9	Plaintiff,		INDICTMENT
10 11	VS.	VIO:	18 U.S.C. § 371 (Conspiracy) Count 1
12 13	Garbis Aram Krajekian, Defendant.		18 U.S.C. § 1956(h) (Conspiracy to Launder Monetary Instruments) Count 2
14 15 16			18 U.S.C. § 472 (Uttering Counterfeit Obligations or Securities) Counts 3-23
17 18 19			18 U.S.C. § 492 18 U.S.C. § 981(a)(1)(C) 18 U.S.C. § 982(a)(2)(B) 28 U.S.C. § 2461 Forfeiture Allegation
20	THE GRAND JURY CHARGES:	1	
21 22	At all times material to this indice elsewhere:	etment,	within the District of Arizona and
23	1. Defendant GARBIS ARAM	I KRA	JEKIAN ("KRAJEKIAN") was an
24	Arizona resident. KRAJEKIAN currently li	ves in (Chandler, Arizona.
25	FEDERAL RE		
26	2. The United States Departme	nt of t	he Treasury, through the Bureau of
27	Engraving and Printing ("BEP"), develops		
28	As its primary function, the BEP oversees the		

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Reserve Notes ("FRN"). The production of FRN involves highly-trained and skilled craftspeople, specialized equipment, and a combination of traditional, old-world printing techniques merged with sophisticated, cutting-edge technology.

3. The BEP produces genuine FRN through a combination of printing processes, which include offset, intaglio, and typographic printing.

a. <u>Offset Printing</u>: This involves the printing of background colors by high-speed, offset presses. These presses print security offset image designs onto currency paper.

b. <u>Intaglio Printing</u>: Some images are engraved onto the surface of a plate. Ink is applied to a plate so that it remains only in the engraved areas. Paper is then laid atop, and the two plates are pressed together under great pressure. As a result, the ink from the recessed areas is pulled onto the paper, creating a raised, finished image. Intaglio printing is used for the portraits, vignettes, scrollwork, numerals, and lettering, which are unique to each denomination.

c. <u>Typographic Printing</u>: This final process utilizes the letterpress printing process. This process adds two serial numbers, the black universal Federal Reserve seal, the green Department of the Treasury seal, and the corresponding Federal Reserve identification number to each FRN.

4. The paper and ink used in the production of FRN is unique as well.

5. Each FRN contains a year or series printed on the actual bill. This year does not necessarily represent the year it was printed. The series designation changes only when significant changes are made to the note design.

6. The serial number ("SN") found on each FRN serves to uniquely identify each note within its denomination and series.

7. The Face Plate ("FP") number identifies the particular printing plate that
was used to print the face side of a note. The Back Plate ("BP") number identifies the
plate used for the backside of the note.

8. Genuine FRN are circulated through the Federal Reserve, which operates as the United States' Central Bank and serves to ensure that adequate amounts of currency are in circulation.

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COUNTERFEIT CURRENCY

9. The United States Secret Service ("USSS") keeps track of counterfeit currency, rates the quality of each counterfeit bill, and classifies notes based on common characteristics.

8 10. Counterfeit notes that are produced utilizing any of the above-mentioned 9 printing methods (intaglio, offset, or typographic) are referred to as circular notes ("C-10 notes"). A permanent and unique number, beginning with a "C", is assigned to each 11 counterfeit note. This number also associates that specific counterfeit note with any other 12 note that shares common defects/characteristics, which include paper quality, ink used, 13 printing plates, and printing methodology. Notes that are part of the same classification 14 scheme are commonly referred to as variations.

15 11. When a new counterfeit note is discovered, a new number is created. This
16 is used for tracking and identification purposes.

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THE COUNTERFEIT SOUTHWEST NOTE

18 12. The USSS divides the United States into four regions: region 1 is the
19 Northeast; region 2 is the Midwest; region 3 is the Southeast; and region 4 is the West
20 coast, the Northwest, and the Southwest. Arizona is located in region 4.

13. Starting in 2003, and to the present day, region 4 has experienced an increased use and circulation of a high quality counterfeit \$100 bill. The note became so prolific that the USSS began to refer to this specific counterfeit bill as the "Southwest note."

14. There are several versions of the Southwest note, with the latest variation
being introduced into the Phoenix-metropolitan area in 2014.

27 28 15. The Southwest note is a sophisticated counterfeit product. It is produced

using much of the same printing technology the government uses in the production of a genuine FRN. In addition, the Treasury Seal and serial numbers on the Southwest note appear to have been computer generated. In order to mimic a genuine bill, the note is composed of two sheets of paper glued together that contain an embedded counterfeit security thread. The Southwest note also contains blue and red fibers, which imitate genuine security fibers but do not share the same characteristics as real fibers.

16. For years, defendant KRAJEKIAN, working with others, obtained, possessed, passed, and transferred high-quality counterfeit U.S. currency (consistent with the Southwest note) and circulated said counterfeit U.S. currency at commercial establishments around the U.S. in exchange for legitimate U.S. currency and other items of value.

17. On or about May 1, 2009, KRAJEKIAN passed \$100 counterfeit bills (Southwest notes) at the following retail establishments at the Mesa Fiesta Mall, 1445 W.Southern Ave, Mesa, Arizona:

15					F	
16	<u>Store</u>	<u>Item</u> <u>Purchased</u>	H'RN I Sed		<u>Serial Number</u>	
17 18	7 Champs \$8.63		\$100 counterfeit bill (Southwest note)	1990	G21984898C	
19 20	Aeropostale	\$10 gift card	\$100 counterfeit bill (Southwest 1990 note)		G21910978C	
21 22	Foot Action	\$6.47 in merchandise	\$100 counterfeit bill (Southwest note)	1990	G21986744C	
23 24	Bath and Body Works	\$10 gift card	\$10 gift card \$100 counterfeit bill (Southwest note)		G21970114C	
25 26	Foot Locker	\$8.63 in merchandise	\$100 counterfeit bill (Southwest note)	1990	G21970112C	
27 28	Hollister	\$10.70 in merchandise	\$100 counterfeit bill (Southwest note)	1990	G22031096C	

- 4 -

1 2 3	Dillards	\$7.55 in merchandise	\$100 counterfeit bill (Southwest note)	1990	G22021856C
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18. On or about August 11, 2013, KRAJEKIAN was driving eastbound through Oklahoma in a rental car. He was stopped by law enforcement, and in his rental car was \$54,000 in counterfeit currency, composed of \$100 bills. The counterfeit bills were determined to be Southwest notes. KRAJEKIAN also had in his possession several \$10 gift cards, which were purchased in New Mexico, Texas, and Oklahoma.

19. On or about April 29, 2014, KRAJEKIAN passed \$100 counterfeit bills (Southwest notes) at the following retail establishments in Las Vegas, Nevada:

11					
12	Store	<u>Item</u> Purchased	FRN Used	<u>Series</u>	<u>Serial</u> Number
13	Ralph Lauren, Las	\$10 gift card or insubstantial	\$100 counterfeit		
14	Vegas Blvd. South #222 (Las Vegas, NV)	purchase for approx. \$10	bill (Southwest note)	1990	L35200482B
15		A 4			
16	Victoria's Secret, 6605 Las Vegas Blvd. (Las	\$10 gift card or insubstantial	\$100 counterfeit bill (Southwest	1990	L35470102B
17	Vegas, NV)	purchase for approx. \$10	note)	1770	L35 170102D
18	20 0 1	4 I 01 0014		1 0100	

20. On or about June 21, 2014, KRAJEKIAN passed a \$100 counterfeit bill (Southwest note) at the following retail establishment in Broomfield, Colorado:

Store	<u>Item</u> Purchased	FRN Used	<u>Series</u>	<u>Serial</u> Number
Victoria's Secret, Flatiron Crossing Mall (Broomfield, CO)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78158672

21. On or about on July 14, 2014, KRAJEKIAN passed \$100 counterfeit bills(Southwest notes) at the following retail establishments at the Fashion Square Mall, 7014E. Camelback Rd., Scottsdale, Arizona ("Fashion Square Mall"):

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2	Store Item Purchased FR		FRN Used	<u>Series</u>	<u>Serial</u> Number				
3 4	Bath and Body Works	\$10 Gift Card	\$100 counterfeit bill (Southwest note)	1996	AB78103196L				
5 6	Banana Republic	Clothing costing approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78103212L				
7 8 9	Love Culture	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78122796L				
1	Express	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78135852L				
.2 .3 .4	Hollister	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78109724L				
5 6 7	Gap	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78046076L				
8	Abercrombie Kids	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78044444L				
20	22. On or about July 19, 2014, KRAJEKIAN passed a \$100 counterfeit bill								

(Southwest note) at the following retail establishment in California:

Item

Purchased

\$10 gift card

21 22

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Store

Victoria's Secret,

Valencia Town Center

(Valencia, California)

23.

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bills (Southwest notes) at the following retail establishments at the Arizona Mills mall,

FRN Used

\$100 counterfeit

bill (Southwest

note)

On or about on August 25, 2014, KRAJEKIAN passed \$100 counterfeit

Series

1996

Serial Number

AB78050988L

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5000 S. Arizona Mills Cir., Tempe, Arizona ("Arizona Mills"):

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		Item			Sovial
3	<u>Store</u>	Purchased			<u>Serial</u> Number
4 5	Nike Factory Store	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78072216L
6 7	Carters	\$10.81 fleece	\$100 counterfeit bill (Southwest note)	1996	AB78209300L
8 9 10	Old Navy	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78222360L
11 12	Disney Store	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78150548
13 14	Levis	\$9.83 shirt	\$100 counterfeit bill (Southwest note)	1996	AB78157076L
15 16 17 18	Oshkosh B Gosh	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78144020L
19 20	Victoria's Secret	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78202772L

24. On or about September 6, 2014, KRAJEKIAN passed \$100 counterfeit bills (Southwest notes) at the following retail establishments at the Chandler Fashion Center, 3111 W Chandler Blvd, Chandler, Arizona ("Chandler Fashion Center"):

24					
25	Store	<u>Item</u> <u>Purchased</u>	FRN Used	<u>Series</u>	<u>Serial Number</u>
26			\$100 counterfeit		
27	Disney Store	\$10 gift card	bill (Southwest note)	1996	AB78240312L
28					

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1 2	The Children's Place	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78175032L		
3 4	Hollister	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78188088L		
5 6	Gap	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78181560L		
7 8 9	Barnes and Noble	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78168504L		
10 11	Bath and Body Works	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78161976L		
12 13	Victoria's Secret	\$8.62 purchase	\$100 counterfeit bill (Southwest note)	1996	AB78129336L		
14	COUNT ONE Conspiracy						

Conspiracy (18 U.S.C. § 371)

25. The factual allegations in paragraphs 1-24 of the Indictment are incorporated by reference and re-alleged as though fully set forth herein.

26. Beginning at a time unknown to the Grand Jury, but at least as early as on or about 2003, to the present, in the District of Arizona and elsewhere, defendant GARBIS ARAM KRAJEKIAN, along with others known and unknown to the Grand Jury, did knowingly and willfully agree and conspire with each other to commit one or more of the following offenses against the United States:

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- a. Title 18, United States Code, Section 471, Obligations or Securities of the United States;
- b. Title 18, United States Code, Section 472, Uttering Counterfeit Obligations or Securities; and

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c. Title 18, United States Code, Section 473, Dealing in Counterfeit

Obligations or Securities. 1 **OBJECTS OF THE CONSPIRACY** 2 27. The objects of the conspiracy were: 3 a. To produce and/or obtain high quality counterfeit \$100 bills; 4 b. To circulate and distribute counterfeit currency into legitimate 5 commercial businesses; 6 7 c. To purchase inexpensive items or gift cards from merchants and pay for these nominal commercial items with counterfeit \$100; and 8 d. To obtain and accumulate large amounts of genuine currency, and 9 other things of value, in exchange for the counterfeit \$100 bills 10 being circulated and passed at these commercial businesses. 11 MANNER AND MEANS OF THE CONSPIRACY AND SCHEME TO DEFRAUD 12 The manner and means of the conspiracy are described in paragraphs 1-27 13 28. 14 above, incorporated by reference and re-alleged as though fully set forth herein. **OVERT ACTS** 15 In furtherance of the conspiracy, and to achieve the objects of the 29. 16 conspiracy, defendant, and others known and unknown, committed or caused to be 17 committed various overt acts in the District of Arizona and elsewhere. The following 18 19 overt acts, among others, were committed: 20 Serial Item **Overt** Store FRN Used Date Series Purchased Number Act 21 \$100 Bath and Body 22 counterfeit Works, Fashion \$10 Gift bill 1996 AB78103196L 7/14/14 23 a Square Mall Card (Southwest (Scottsdale, AZ) 24 note)

\$100 Banana Republic, Clothing counterfeit 1996 AB78103212L **Fashion Square** costing bill b 7/14/14 (Southwest Mall approx. \$10 (Scottsdale, AZ) note)

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1	ſ			Love Culture,	\$10 gift	\$100		
				Fashion Square	card or	counterfeit	1996	A D 791227061
2		С	7/14/14	Mall	insubstantial	bill (Southwest	1996	AB78122796L
3				(Scottsdale, AZ)	purchase for approx. \$10	(Southwest note)		
4	+				\$10 gift	\$100		
				Express,	card or	counterfeit		
5		d	7/14/14	Fashion Square	insubstantial	bill	1996	AB78135852L
6		u	//14/14	Mall	purchase for	(Southwest	1990	
				(Scottsdale, AZ)	approx. \$10	note)		
7	ŀ			TT 11	\$10 gift	\$100		
8				Hollister,	card or	counterfeit		
		e	7/14/14	Fashion Square Mall	insubstantial	bill	1996	AB78109724L
9				(Scottsdale, AZ)	purchase for	(Southwest		
10				(Scousuale, AZ)	approx. \$10	note)		
11					\$10 gift	\$100		
11				Gap, Fashion	card or	counterfeit		
12		f	7/14/14	Square Mall	insubstantial	bill	1996	AB78046076L
13				(Scottsdale, AZ)	purchase for	(Southwest		
15				1	approx. \$10	note)		
14				Abercrombie	\$10 gift	\$100		
15			7/14/14	Kids, Fashion	card or	counterfeit bill	1996	AB78044444L
		g	7/14/14	Square Mall	insubstantial	(Southwest	1990	AD/0044444L
16				(Scottsdale, AZ)	purchase for approx. \$10	note)		
17						\$100		
				Nike Factory		counterfeit		
18		h	8/25/14	Store, Arizona	\$10 gift	bill	1996	AB78072216L
19			0/20/11	Mills	card	(Southwest		
20				(Tempe, AZ)		note)		
20						\$100		
21				Carters, Arizona	\$10.81	counterfeit		
22		i	8/25/14	Mills	fleece	bill	1996	AB78209300L
22				(Tempe, AZ)	neece	(Southwest		
23						note)		
24					\$10 gift	\$100		
				Old Navy,	card or	counterfeit	1007	
25		j	8/25/14	Arizona Mills	insubstantial	bill	1996	AB78222360L
26				(Tempe, AZ)	purchase for	(Southwest		
					approx. \$10	note)		
27								

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	1					
k	8/25/14	Disney Store, Arizona Mills (Tempe, AZ)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78150548
1	8/25/14	Levis, Arizona Mills (Tempe, AZ)	\$9.83 t-shirt	\$100 counterfeit bill (Southwest note)	1996	AB78157076L
m	8/25/14	Oshkosh B Gosh, Arizona Mills (Tempe, AZ)	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78144020L
n	8/25/14	Victoria's Secret, Arizona Mills (Tempe, AZ)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78202772L
0	9/06/14	Disney Store, Chandler Fashion Center (Chandler, AZ)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78240312L
р	9/06/14	The Children's Place, Chandler Fashion Center (Chandler, AZ)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78175032L
q	9/06/14	Hollister, Chandler Fashion Center (Chandler, AZ)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78188088L
r	9/06/14	Gap, Chandler Fashion Center (Chandler, AZ)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78181560L
	1 m n o p q	1 8/25/14 m 8/25/14 n 8/25/14 o 9/06/14 p 9/06/14 q 9/06/14	k8/25/14Arizona Mills (Tempe, AZ)l8/25/14Levis, Arizona Mills (Tempe, AZ)m8/25/14Oshkosh B Gosh, Arizona Mills (Tempe, AZ)n8/25/14Victoria's Secret, Arizona Mills (Tempe, AZ)o9/06/14Disney Store, Chandler Fashion Center (Chandler, AZ)p9/06/14The Children's Place, Chandler Fashion Center (Chandler, AZ)q9/06/14Hollister, Chandler Fashion Center (Chandler, AZ)r9/06/14Gap, Chandler Fashion Center (Chandler, AZ)	k8/25/14Arizona Mills (Tempe, AZ)\$10 gift card18/25/14Levis, Arizona Mills (Tempe, AZ)\$9.83 t-shirtm8/25/14Oshkosh B Gosh, Arizona Mills (Tempe, AZ)\$10 gift card or insubstantial purchase for approx. \$10n8/25/14Oshkosh B Gosh, Arizona Mills (Tempe, AZ)\$10 gift card or insubstantial purchase for approx. \$10n8/25/14Oshkosh B Gosh, Arizona Mills (Tempe, AZ)\$10 gift cardo9/06/14Disney Store, Chandler Fashion Center (Chandler, AZ)\$10 gift cardp9/06/14The Children's Place, Chandler Fashion Center (Chandler, AZ)\$10 gift cardq9/06/14Hollister, Chandler Fashion Center (Chandler, AZ)\$10 gift cardr9/06/14Gap, Chandler Fashion Center (Chandler, AZ)\$10 gift card	k $8/25/14$ Arizona Mills (Tempe, AZ) $\$10$ gift cardbill (Southwest note)1 $8/25/14$ Levis, Arizona Mills (Tempe, AZ) $\$9.83$ t-shirt $\$100$ counterfeit bill (Southwest note)m $8/25/14$ Oshkosh B Gosh, Arizona Mills (Tempe, AZ) $\$10$ gift card or insubstantial purchase for approx. $\$10$ $\$100$ counterfeit bill (Southwest note)n $8/25/14$ Oshkosh B Gosh, Arizona Mills (Tempe, AZ) $\$10$ gift card or insubstantial purchase for approx. $\$10$ $\$100$ counterfeit bill (Southwest note)n $8/25/14$ Victoria's Secret, Arizona 	k $8/25/14$ Arizona Mills (Tempe, AZ) $$10 \text{ gift}cardbill(Southwestnote)199618/25/14Levis, ArizonaMills(Tempe, AZ)9.83 t-shirt100 \text{ counterfeit}bill(Southwestnote)1996m8/25/14Coshkosh BGosh, ArizonaMills(Tempe, AZ)$10 \text{ gift}card orinsubstantialpurchase forapprox. $10$100counterfeitbill(Southwestnote)1996n8/25/14Oshkosh BGosh, ArizonaMills(Tempe, AZ)$10 \text{ gift}card orinsubstantialpurchase forapprox. $10$100counterfeitbill(Southwestnote)1996n8/25/14Victoria'sSecret, ArizonaMills(Tempe, AZ)$10 giftcard$100counterfeitbill(Southwestnote)1996o9/06/14Disney Store,ChandlerFashion Center(Chandler, AZ)$10 giftcard$100counterfeitbill(Southwestnote)1996p9/06/14The Children'sPlace, ChandlerFashion Center(Chandler, AZ)$10 giftcard$100counterfeitbill(Southwestnote)1996q9/06/14Hollister,Fashion Center(Chandler, AZ)$10 giftcard$100counterfeitbill(Southwestnote)1996q9/06/14Gap, ChandlerFashion Center(Chandler, AZ)$10 giftcard$100counterfeitbill(Southwestnote)1996r9/06/14Gap, ChandlerFashion Center(Chandler, AZ)$10 giftcard$100coun$

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1 2 3	S	9/06/14	Barnes and Noble, Chandler Fashion Center (Chandler, AZ)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78168504L
4			Bath and Body		\$100		
5	t	9/06/14	Works, Chandler	\$10 gift card	counterfeit bill	1996	AB78161976L
6			Fashion Center	caru	(Southwest		
7			(Chandler, AZ)		note)		
9 10	u	9/06/14	Victoria's Secret, Chandler Fashion Center (Chandler, AZ)	\$8.62 purchase	\$100 counterfeit bill (Southwest note)	1996	AB78129336L

In violation of Title 18, United States Code, Section 371.

Conspiracy to Launder Monetary Instruments 18 U.S.C. § 1956(h)

30. The factual allegations in paragraphs 1-29 and 33 of the Indictment are incorporated by reference and re-alleged as though fully set forth herein.

31. Beginning at a time unknown to the Grand Jury, but at least as early as on 16 or about 2003, to the present, in the District of Arizona and elsewhere, defendant 17 GARBIS ARAM KRAJEKIAN, along with others, known and unknown to the Grand 18 Jury, did knowingly conspire, and agree to commit a money laundering offense against 19 the United States, in violation of Title 18, United States Code, Section 1956, to wit: to 20 knowingly conduct and attempt to conduct a financial transaction affecting interstate and 21 foreign commerce, which involved the proceeds of a specified unlawful activity, that is 22 violations of Title 18, United States Code, Section 471 (Obligations or Securities of the 23 United States); Title 18, United States Code, Section 472 (Uttering Counterfeit 24 Obligations or Securities); and Title 18, United States Code, Section 473 (Dealing in 25 Counterfeit Obligations or Securities), with the intent to promote the carrying on of said 26 specified unlawful activity, that is counterfeiting activities, and that while conducting and 27

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attempting to conduct such financial transactions, defendant and others knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity as described herein.

In violation of Title 18, United States Code, Section 1956(h).

<u>COUNTS THREE - TWENTY-THREE</u> Uttering Counterfeit Obligations or Securities 18 U.S.C. § 472

32. The factual allegations in paragraphs 1-31 of the Indictment are incorporated by reference and re-alleged as though fully set forth herein.

33. On or about the dates listed below, in the District of Arizona and elsewhere, defendant GARBIS ARAM KRAJEKIAN, along with others both known and unknown to the Grand Jury, with intent to defraud, did pass, utter, and attempt to pass and utter a falsely made, forged, and counterfeited obligation of the United States, that is, a Federal Reserve Note in the denomination of one hundred dollars, with a corresponding identifier, which he and others then knew to be falsely made, forged and counterfeited, as set forth in the chart below, each such instance being a separate count of this Indictment:

17 18	<u>Ct.</u>	Date	<u>Store</u>	<u>Item</u> <u>Purchased</u>	FRN Used	<u>Series</u>	<u>Serial</u> Number
19 20 21	3	7/14/14	Bath and Body Works, Fashion Square Mall (Scottsdale, AZ)	\$10 Gift Card	\$100 counterfeit bill (Southwest note)	1996	AB78103196L
22 23 24	4	7/14/14	Banana Republic, Fashion Square Mall (Scottsdale, AZ)	Clothing costing approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78103212L
25 26 27 28	5	7/14/14	Love Culture, Fashion Square Mall (Scottsdale, AZ)	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78122796L

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1 2 3	6	7/14/14	Express, Fashion Square Mall (Scottsdale, AZ)	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78135852L
4 5 6 7	7	7/14/14	Hollister Fashion Square Mall, (Scottsdale, AZ)	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78109724L
7 8 9 10	8	7/14/14	Gap, Fashion Square Mall (Scottsdale, AZ)	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78046076L
11 12 13	9	7/14/14	Abercrombie Kids, Fashion Square Mall (Scottsdale, AZ)	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78044444L
14 15 16	10	8/25/14	Nike Factory Store, Arizona Mills (Tempe, AZ)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78072216L
 17 18 19 20 	11	8/25/14	Carters, Arizona Mills (Tempe, AZ)	\$10.81 fleece	\$100 counterfeit bill (Southwest note)	1996	AB78209300L
20 21 22 23	12	8/25/14	Old Navy, Arizona Mills (Tempe, AZ)	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78222360L
24 25 26 27	13	8/25/14	Disney Store, Arizona Mills (Tempe, AZ)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78150548
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1 2 3	14	8/25/14	Levis, Arizona Mills (Tempe, AZ)	\$9.83 t-shirt	\$100 counterfeit bill (Southwest note)	1996	AB78157076L
4 5 6	15	8/25/14	Oshkosh B Gosh, Arizona Mills (Tempe, AZ)	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78144020L
7 8 9 10	16	8/25/14	Victoria's Secret, Arizona Mills (Tempe, AZ)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78202772L
11 12 13	17	9/06/14	Disney Store, Chandler Fashion Center (Chandler, AZ)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78240312L
14 15 16	18	9/06/14	The Children's Place, Chandler Fashion Center (Chandler, AZ)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78175032L
 17 18 19 20 	19	9/06/14	Hollister, Chandler Fashion Center (Chandler, AZ)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78188088L
20 21 22 23	20	9/06/14	Gap, Chandler Fashion Center (Chandler, AZ)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78181560L
24 25 26 27	21	9/06/14	Barnes and Noble, Chandler Fashion Center (Chandler, AZ)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78168504L
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1 2 3	22	9/06/14	Bath and Body Works, Chandler Fashion Center (Chandler, AZ)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78161976L
4 5 6 7	23	9/06/14	Victoria's Secret, Chandler Fashion Center (Chandler, AZ)	\$8.62 purchase	\$100 counterfeit bill (Southwest note)	1996	AB78129336L

In violation of Title 18, United States Code, Section 472.

FORFEITURE ALLEGATION

34. The factual allegations in paragraphs 1 through 33 of the Indictment are incorporated by reference and re-alleged as though set forth fully herein.

35. Pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2)(B), and Title 28, United States Code, Section 2461, and as a result of committing one or more of the offenses in Counts 1 - 23 of this Indictment, defendant GARBIS ARAM KRAJEKIAN shall forfeit to the United States, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offenses, including but not limited to the aggregate sum of \$2.5 million, in that the aggregate sum is the proceeds of the specified unlawful acts, as defined in Title 18, United States Code, Section 472 (Uttering Counterfeit Obligations and Securities).

36. Pursuant to Title 18, United States Code, Section 982(a)(1), and as a result of committing the money laundering offense charged in Count 2 of this Indictment, in violation of Title 18, United States Code, Section 1956(h), defendant GARBIS ARAM KRAJEKIAN shall forfeit to the United States:

a. All right, title and interest in any and all property, real and personal, involved in the violation of Title 18, United States Code, Section 1956(h), if convicted, and all property traceable to such property, including the following: 1) all money or other property that was the subject of each transaction, transportation,

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transmission, or transfer in violation of Section 1956(h); 2) all commissions, fees, and other property constituting proceeds obtained as a result of this violation; and 3) all property used in any manner to commit or facilitate the commission of this offense.

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b. A sum of money equal to the total amount of money involved in the Section 1956(h) offense, if convicted.

37. Pursuant to Title 18, United States Code, Section 492, and as a result of committing one or more of the offenses in Counts 1, 3 - 23 of this Indictment, defendant GARBIS ARAM KRAJEKIAN shall forfeit to the United States all articles, devices, and other things made, possessed or used or intended to be used in violation of Title 18, Untied States Code, Section 472.

12 38. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by 13 Title 18, United States Code, Section 982(b), and Title 28, United States Code, Section 14 2461, defendant shall forfeit substitute property, up to the value of the amount described 15 above, if by any act or omission of defendant, the property described above, or any 16 portion thereof, cannot be located upon the exercise of due diligence; has been 17 transferred, sold to or deposited with a third party; has been placed beyond the 18 jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

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1	39. All in accordance with Title 18, United States Code, Sections 492, 981 and
2	982; Title 28, United States Code, Section 2461; and Rule 32.2, Federal Rules of
3	Criminal Procedure.
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5	A TRUE BILL
6	/S/
7	FOREPERSON OF THE GRAND JURY
8	Date: September 16, 2014
9	JOHN S. LEONARDO
10	United States Attorney District of Arizona
11	/S/
12	WALTER PERKEL
13	PETER SEXTON Assistant U.S. Attorneys
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