

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

FILED
2015 JUL -7 P 1:41
RICHARD W. WICKENS
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

v.

CR 15-234CRB

ARA KARAPEDYAN, et al. (see attached)

DEFENDANT(S).

SUPERSEDING INDICTMENT

VIOLATIONS: Title 18, United States Code, Section 1962(d) – Racketeering Conspiracy; Title 18, United States Code, Section 1028(f) – Conspiracy to Commit Identity Theft; Title 18, United States Code, Section 1029(b)(2) – Conspiracy to Commit Access Device Fraud; Title 18, United States Code, Section 1349 – Conspiracy to Commit Mail, Wire, and Bank Fraud; Title 18, United States Code, Section 1956(h) – Conspiracy to Commit Money Laundering; Title 18, United States Code, Section 1958 – Conspiracy to Use Interstate Facility to Commit Murder-For-Hire; Title 18, United States Code, Section 371 – Conspiracy to Engage in the Unlicensed Wholesale Distribution of Drugs; Title 18, United States Code, Sections 492, 981(a)(1)(A) & (C), 982(a)(1), (2), & (7), 1028(b), 1029(c), 1963; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461(c) – Forfeiture

A true bill.



Foreman

Filed in open court this 7th day of

July 2015.



ROSE MAHER

Clerk

MARIA-ELENA JAMES
UNITED STATES MAGISTRATE JUDGE

NO PROCESS

Bail, \$ _____

Attachment to Grand Jury Cover sheet

UNITED STATES OF AMERICA,

Plaintiff,

v.

- (1) ARA KARAPEDYAN,
- (2) MIHRAN STEPANYAN,
- (3) ARTUR STEPANYAN,
- (4) GEVORK TER-MKRTCHYAN,
- (5) KHACHIG GEUYDIJIAN,
- (6) ARMAN PETROYSAN,
- (7) LANNA KARAPEDYAN,
- (8) MAXWELL STARKSKY,
- (9) SEVAK GHARGHANI,
- (10) JEAN DUKMAJIAN,
- (11) KARINE DUKMAJIAN,
- (12) ANGELA DUKMAJIAN,
- (13) ARMAN DANIELIAN,
- (14) ASATOUR MAGZANYAN,
- (15) TIGRAN SARKISYAN,
- (16) HRIPSIME KHACHTRYAN,
- (17) LOUI ARTIN,
- (18) HUGO MARQUEZ,
- (19) ARMAN ZARGARYAN,
- (20) DMITRIY KUSTOV,
- (21) MICHAEL INMAN,
- (22) ARAXIA NAZARYIAN,
- (23) ALEXANDER SOLIMAN,
- (24) CHERYL BARNDT,
- (25) ERIC FIGUEROA,
- (26) MARC ASHEGHIAN,
- (27) MICHAEL ASHEGHIAN,
- (28) DAVID MILLER,
- (29) JAMES RUSSO,
- (30) JEANNETTE COUCH,
- (31) MARIE POLICHETTI,
- (32) BERNARDO GUILLEN, and
- (33) JAVIER RAMIREZ,

Defendants.

FILED
2015 JUL -7 P 1:41
FEDERAL BUREAU OF INVESTIGATION
NORTHERN DISTRICT OF CALIFORNIA

1 MELINDA HAAG (CABN 132612)
United States Attorney

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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11 UNITED STATES OF AMERICA

) No. 15-CR-0234-CRB

12 v.

) VIOLATIONS: Title 18, United States Code, Section
) 1962(d) – Racketeering Conspiracy; Title 18, United
) States Code, Section 1028(f) – Conspiracy to Commit
) Identity Theft; Title 18, United States Code,
) Section 1029(b)(2) – Conspiracy to Commit Access
) Device Fraud; Title 18, United States Code,
) Section 1349 – Conspiracy to Commit Mail, Wire,
) and Bank Fraud; Title 18, United States Code,
) Section 1956(h) – Conspiracy to Commit Money
) Laundering; Title 18, United States Code,
) Section 1958 – Conspiracy to Use Interstate Facility
) to Commit Murder-For-Hire; Title 18, United States
) Code, Section 371 – Conspiracy to Engage in the
) Unlicensed Wholesale Distribution of Drugs; Title 18,
) United States Code, Sections 492, 981(a)(1)(A) &
) (C), 982(a)(1), (2), & (7), 1028(b), 1029(c), 1963;
) Title 21, United States Code, Section 853; and Title
) 28, United States Code, Section 2461(c) – Forfeiture

- 13 (1) ARA KARAPEDYAN,
14 (2) MIHRAN STEPANYAN,
15 (3) ARTUR STEPANYAN,
16 (4) GEVORK TER-MKRTCHYAN,
17 (5) KHACHIG GEUYDIJIAN,
18 (6) ARMAN PETROYSAN,
19 (7) LANNA KARAPEDYAN,
20 (8) MAXWELL STARKSKY,
21 (9) SEVAK GHARGHANI,
22 (10) JEAN DUKMAJIAN,
23 (11) KARINE DUKMAJIAN,
24 (12) ANGELA DUKMAJIAN,
25 (13) ARMAN DANIELIAN,
26 (14) ASATOUR MAGZANYAN,
27 (15) TIGRAN SARKISYAN,
28 (16) HRIPSIME KHACHTRYAN,
(17) LOUI ARTIN,
(18) HUGO MARQUEZ,
(19) ARMAN ZARGARYAN,
(20) DMITRIY KUSTOV,
(21) MICHAEL INMAN,
(22) ARAXIA NAZARYIAN,
(23) ALEXANDER SOLIMAN,
(24) CHERYL BARNDT,
(25) ERIC FIGUEROA,
(26) MARC ASHEGHIAN,

) SAN FRANCISCO VENUE

) UNDER SEAL

1 (27) MICHAEL ASHEGHIAN,)
 2 (28) DAVID MILLER,)
 3 (29) JAMES RUSSO,)
 4 (30) JEANNETTE COUCH,)
 5 (31) MARIE POLICHETTI,)
 6 (32) BERNARDO GUILLEN, and)
 7 (33) JAVIER RAMIREZ,)
 8 Defendants.)

9 FIRST SUPERSEDING INDICTMENT

10 The Grand Jury charges:

11 Introductory Allegations

12 At all times relevant to this Indictment:

13 1. Defendant ARA KARAPEDYAN was a businessman in Northridge, California. He
14 owned and operated a pizza restaurant, called Old Sicily, in North Hollywood, California.

15 2. Defendant MIHRAN STEPANYAN was a businessman in Glendale, California. He
16 owned and operated a California-licensed drug wholesale company, Niva Pharmaceuticals, in North
17 Hollywood, California, although he reported to a California state pharmacy inspector in 2014 that Niva
18 Pharmaceuticals was not engaged in wholesale drug distribution. Defendant ARTUR STEPANYAN
19 was a cousin of defendant MIHRAN STEPANAYAN and lived in Glendale, California. MIHRAN
20 STEPANAYAN and ARTUR STEPANYAN created and controlled a variety of business entities,
21 including: Red Rock Capital, Trans Atlantic Capital, GC National Wholesale, Sky Atlantic Capital, and
22 Nationwide Payment Solutions.

23 3. Defendant LANNA KARAPEDYAN was ARA KARAPEDYAN’s daughter. Defendant
24 ARMAN PETROYSAN was LANNA KARAPEDYAN’s husband and ARA KARAPEDYAN’s son-in-
25 law.

26 4. Defendants GEVORK TER-MKRTCHYAN, KHACHIG GEUYDIJIAN, MAXWELL
27 STARSKY, SEVAK GHARGHANI, and JEAN DUKMAJIAN were associates of ARA
28 KARAPEDYAN. TER-MKRTCHYAN operated a non-profit medical clinic called All Care One
Community Health. Defendant GEUYDIJIAN operated an unlicensed private mail box business called

1 Mailworks, Etc., in Chatsworth, California. GEUYDIJIAN also created and controlled other business
2 entities, including: Legal-Act Entities; All American Real Estate Company; and Pro Serve Entities, Inc.
3 STARSKY lived in Studio City, California, and was an associate of ARA KARAPEDYAN.
4 GHARGHANI worked at ARA KARAPEDYAN's pizza restaurant. JEAN DUKMAJIAN and operated
5 a check cashing business called Duke's Check Cashing in North Hollywood, California.

6 5. Defendants KARINE DUKMAJIAN and ANGELA DUKMAJIAN were daughters of
7 defendant JEAN DUKMAJIAN, and both worked at Duke's Check Cashing. ANGELA DUKMAJIAN
8 was Duke's Check Cashing's anti-money laundering and compliance officer and was responsible for
9 verifying that transactions conducted at Duke's Check Cashing met all legal requirements.

10 6. Defendants ARMAN DANIELIAN, ASATOUR MAGZANYAN, and LOUI ARTIN
11 were associates of ARA KARAPEDYAN. DANIELIAN lived in Burbank, California, and created drug
12 wholesale companies, including Nuvo Pharmaceuticals and Niva Pharmaceuticals, by preparing and
13 filing the necessary paperwork. Defendants TIGRAN SARKISYAN and HRIPSIME KHACHTRYAN
14 were husband and wife and lived in North Hollywood, California. Both were associates of MAXWELL
15 STARSKY.

16 7. Defendant HUGO MARQUEZ lived in Encino, California, and was involved in the
17 operation of several drug wholesale drug companies, including: Apex Pharmaceuticals, which was
18 licensed in California until in or about November 2011; Maroon Pharma, which was licensed in New
19 York; and ME Wholesale, which was licensed in Pennsylvania. Defendant ERIC FIGUEROA was a
20 friend and associate of MARQUEZ and helped him procure drugs to sell. Defendant ARMAN
21 ZARGARYAN was an associate of MARQUEZ who lived in Encino, California. ZARGARYAN
22 operated a California-licensed drug wholesale company, Nuvo Pharmaceuticals, which had originally
23 been created by ARMAN DANIELIAN. Defendant DMITRIY KUSTOV was an associate of
24 ZARGARYAN who lived in Los Angeles, California. Defendant MICHAEL INMAN lived in Beverly
25 Hills, California, and stole checks that were ultimately used to fund a bank account from which
26 ZAGARYAN and KUSTOV tried to withdraw money. Defendant ARAXIA NAZARYIAN lived in
27 Van Nuys, California, and worked for ZARGARYAN at Nuvo Pharmaceuticals.

28 8. Defendant ALEXANDER SOLIMAN lived in Valencia, California, and owned and

1 controlled several businesses engaged in the wholesale distribution of drugs, including Apex
2 Pharmaceuticals and Maroon Pharma, which he operated with HUGO MARQUEZ and defendant
3 CHERYL BARNDT. BARNDT worked at Apex Pharmaceuticals and Maroon Pharma buying and
4 selling drugs. Defendants MARC ASHEGHIAN and MICHAEL ASHEGHIAN were brothers who
5 lived, respectively, in Sherman Oaks and Los Angeles, California, and controlled Fox Health Care, a
6 drug wholesaler located and licensed in Utah.

7 9. Defendant DAVID MILLER lived in Santa Ana, California, and owned, operated, and
8 controlled a variety of drug wholesale businesses, including: Minnesota Independent Cooperative
9 (“MIC”) in Eaton, Minnesota, which was licensed to wholesale drugs in Minnesota and had an office in
10 Tustin, California, where it was also called E-Tail Network; B&Y Wholesale Distributors, which was
11 licensed to wholesale drugs in Puerto Rico; and FMC Distributors, which was also licensed to wholesale
12 drugs in Puerto Rico. Defendant JAMES RUSSO lived in Minnesota and worked for MIC in Eaton as
13 Vice-President of Operations. Defendants JEANNETTE COUCH and MARIE POLICHETTI worked
14 for MIC in Tustin, California, where COUCH was Head of Purchasing and POLICHETTI was the
15 Office Manager and, among other responsibilities, handled paying debts of the company. BERNARDO
16 GUILLEN and JAVIER RAMIREZ worked for MIC in Tustin, California, where they inspected drugs
17 for MIC and shipped drugs from California to MIC in Minnesota.

18 Distribution of Improperly Procured Drugs

19 10. The wholesale distribution of drugs in the United States and its territories is subject to
20 federal and state regulation. Generally speaking, anyone seeking to engage in the distribution of
21 pharmaceuticals must be licensed in the state and territory in which one does business. Licensing is
22 required in order to ensure that drug distributors procure, handle, and store their drugs in a manner that
23 ensures the drugs’ effectiveness and safety. In addition, applicable laws and regulations require drug
24 distributors to maintain strict records on the provenance of the drugs they sell. Such drug “pedigrees”
25 must state, at minimum, from whom the distributor purchased the drugs and are intended to allow for the
26 origins of drugs to be readily determined, which is necessary to ensure the effectiveness and safety of
27 the drugs, as well as to facilitate any drug recalls.

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1 11. Typically, the prices of drugs do not vary greatly. Drug manufacturers generally set a
2 price, called the Wholesale Acquisition Cost (“WAC”), which is the price they charge to wholesalers
3 and other direct accounts before the application of any rebates, discounts, allowances, and other price
4 concessions. Given that many drugs are under patent, and thus, subject to monopolistic pricing, there is
5 little deviation from the WAC for non-generic drugs.

6 12. Beginning no later than in or about 2009, MIHRAN STEPANYAN and ARTUR
7 STEPANYAN supplied DAVID MILLER and MIC with large amounts of drugs. Between in or about
8 2009 up through April 2015, MIC purchased more than \$157 million worth of drugs from MIHRAN
9 STEPANYAN and ARTUR STEPANYAN. Rather than acquire their drugs lawfully from
10 manufacturers and authorized distributors, MIHRAN STEPANYAN and ARTUR STEPANYAN
11 instead procured the drugs they sold from unlicensed sources. In order to conceal their unlawful
12 conduct and launder the proceeds thereof, MIHRAN STEPANYAN, ARTUR STEPANYAN, and their
13 associates conducted their drug sales through front companies such as Red Rock Capital, Trans Atlantic
14 Capital, GC National Wholesale, Sky Atlantic Capital, and Nationwide Payment Solutions. They also
15 conducted their transactions using aliases. For instance, MIHRAN STEPANYAN conducted many of
16 his drug sales using the names “George Cardashian” and “Zohrab Hovhannisyan” instead of his own
17 true name.

18 13. DAVID MILLER and his associates were aware that the drugs MIC purchased from
19 MIHRAN STEPANYAN and ARTUR STEPANYAN had not been supplied through proper channels.
20 MIC employees BERNARD GUILLEN and JAVIER RAMIREZ worked with the STEPANYANs in
21 Southern California to package the drugs and send them from California to either MIC in Minnesota or
22 directly to MIC’s customers via UPS. In order to conceal the true origins of the drugs MIC purchased
23 and sold, MILLER and his associates, such as JEANNETTE COUCH and MARIE POLICHETTI,
24 created false drug pedigrees and invoices, as well as conducted MIC’s drug purchases through front
25 companies such as B&Y Wholesale Distributors and FMC Distributors, to make it appear that B&Y
26 Wholesale Distributors and FMC Distributors in Puerto Rico were supplying the drugs that MIC
27 purchased. MILLER, JAMES RUSSO, COUCH, POLICHETTI, and GUILLEN coordinated their
28

1 activities via e-mail, telephone, and facsimile, as well as sent fraudulent documents to customers via e-
2 mail. For example:

3 a. On or about November 22, 2012, GUILLEN received an e-mail with an attached
4 invoice for the sale of the drug Cymbalta from an e-mail account for GC National Wholesale, a
5 company controlled by MIHRAN STEPANYAN and ARTUR STEPANYAN.

6 b. On or about December 13, 2012, POLICHETTI sent an e-mail to MILLER and an
7 unindicted co-conspirator (the "CC"), attaching instructions for the wire transfer of approximately
8 \$1,232,444 to pay a particular invoice, which included payment for Cymbalta.

9 c. On or about April 15, 2013, GUILLEN received an e-mail with several attached
10 invoices, including an invoice for the sale of the drug Advair, from an e-mail account for GC National
11 Wholesale.

12 d. On or about May 28, 2013, the GC National Wholesale e-mail account sent an e-
13 mail to POLICHETTI, stating, "Hi Marie, Urgent!!! Do you have any ready to pay invoices?? Pleae
14 [sic] let me know.. [sic] Thanks."

15 e. Later on or about May 28, 2013, POLICHETTI responded to the preceding e-mail
16 from GC National Wholesale, stating, "Hi George, I have to wait until tomorrow; I need David's
17 approval and he won't be in until tomorrow."

18 f. On or about May 30, 2013, POLICHETTI sent an e-mail to the CC and MILLER
19 with an attached document describing a payment of \$1,214,424 from MIC to B&Y Wholesale
20 Distributors relating to the sale of the drug Advair.

21 g. Later on about May 30, 2013, POLICHETTI sent an e-mail to the CC and
22 MILLER, attaching instructions for the wire transfer of approximately \$1,205,197 to a GC National
23 Wholesale bank account.

24 h. On or about September 19, 2013, GUILLEN received an e-mail with several
25 attached invoices, including an invoice for the sale of Cymbalta, from an e-mail account for GC
26 National Wholesale.

1 i. On or about October 7, 2013, POLICHETTI sent an e-mail to the CC and
 2 MILLER with an attached document describing a payment of approximately \$1,052,581 from MIC to
 3 B&Y Wholesale Distributors, in part for the sale of Cymbalta.

4 j. Approximately one minute after sending the preceding e-mail, on or about
 5 October 7, 2013, POLICHETTI sent another e-mail to the CC and MILLER attaching instructions for
 6 the wire transfer of approximately \$853,402 to a GC National Wholesale bank account.

7 14. In addition, with each shipment of drugs that MIC sold to a customer, MIC provided an
 8 access code so that the customer could download the pedigree information for the purchased drugs via
 9 the web site www.micoop.com, which was maintained by an Internet Service Provider in the Northern
 10 District of California. MILLER caused to be posted on www.micoop.com fraudulent drug pedigree
 11 information for MIC customers to download. For example, set forth in the table below, between
 12 approximately November 2012 and February 2014, MIC sent thirty-two shipments of drugs to a
 13 pharmacy customer in Texas and posted pedigree information on www.micoop.com claiming that the
 14 drugs had been supplied by B&Y Wholesale Distributors in Puerto Rico when, in fact, they had been
 15 supplied from California directly to the customer:

UPS Tracking Number	Delivery Date	MIC Invoice Number
1Z13VR001340660996	11/07/2012	15857
1Z13VR001341413984	11/08/2012	15915
1Z13VR001341621580	12/03/2012	16298
1Z13VR001340029124	12/12/2012	16452
1Z13VR001340724711	12/20/2012	16600
1Z13VR000241346569	12/31/2012	16672
1Z13VR001341561725	12/31/2012	16720
1Z13VR001342156706	02/06/2013	17237
1Z13VR000242067396	02/11/2013	17308
1Z13VR000241976914	02/28/2013	17634
1Z13VR000240928272	03/15/2013	17919
1Z13VR001342054521	03/20/2013	18052
1Z13VR001340903385	04/04/2013	18342
1Z13VR000242139782	04/08/2013	18380
1Z13VR001340904900	04/25/2013	18766
1Z13VR000240374147	05/13/2013	19097
1Z13VR000241435187	05/22/2013	19349
1Z13VR001341753152	05/31/2013	19575

UPS Tracking Number	Delivery Date	MIC Invoice Number
1Z13VR001341172520	06/18/2013	19945
1Z13VR000242544709	06/26/2013	20146
1Z13VR001342849511	07/05/2013	20410
1Z13VR000241001412	07/24/2013	20710
1Z13VR001342883706	08/08/2013	21105
1Z13VR001342302646	08/28/2013	21490
1Z13VR001341450336	09/16/2013	21807
1Z13VR001341625317	10/04/2013	22265
1Z13VR001342896158	10/31/2013	22974
1Z13VR001340406832	12/13/2013	24030
1Z13VR000240240666	12/26/2013	24149
1Z13VR000340407556	01/03/2014	24390
1Z13VR001341660636	02/12/2014	25152
1Z13VR001341272225	02/25/2014	25431

15. HUGO MARQUEZ and ARMAN ZARGARYAN similarly engaged in the distribution of drugs they procured from unlicensed sources. ERIC FIGUEROA helped MARQUEZ find drugs from unlicensed sources. Beginning no later than in or about 2012 and continuing through 2013, they sold in excess of \$24 million worth of improperly procured drugs to Apex Pharmaceuticals, Maroon Pharma, and ME Wholesale – which was a business originally created by MIHRAN STEPANYAN and ARTUR STEPANYAN – which then sold the drugs to other customers.

16. Apex Pharmaceuticals and Maroon Pharma were operated by ALEXANDER SOLIMAN and CHERYL BARNDT, who worked with MARQUEZ and were aware that the drugs their businesses purchased had not been supplied through proper channels. BARNDT, who dealt with customers for Apex Pharmaceuticals and Maroon Pharma, sent e-mails containing false pedigree information to customers. Generally, these pedigrees falsely claimed that the drugs being sold had been supplied by authorized drug distributors when, in fact, they had not been. In addition, SOLIMAN and BARNDT caused Maroon Pharma to pay the ASHEGHIANs' drug wholesale company, Fox Health Care, but the ASHEGHIANs transferred much of the money into other bank accounts, including an account controlled by MARQUEZ as well as another account from which much of the money was withdrawn via ATM cash withdrawals. For ME Wholesale transactions, MARQUEZ also claimed to have been supplied by Nuvo Pharmaceuticals. Nuvo Pharmaceuticals, however, was a business originally created by ARMAN DANIELIAN and it did not receive drugs from the manufacturers and authorized distributors that it

1 claimed it did. In addition, Nuvo Pharmaceuticals was controlled and operated by ARMAN
2 ZARGARYAN under the alias "Ara Yeramyan." From in or about September 2013 to in or about
3 December 2013, ARAXIA NAZARYIAN withdrew more than \$2 million in Nuvo Pharmaceuticals
4 proceeds from bank accounts maintained under the "Ara Yermamyan" name.

5 17. ARA KARAPEDYAN likewise engaged in the unlicensed sale of improperly procured
6 drugs. On at least three occasions in 2013, KARAPEDYAN met with a purchaser in various parking
7 lots in the Eastern District of California and delivered boxes and bottles of drugs such as Abilify,
8 Liboderm, Cymbalta, Namenda, Atripla, Truvada, and Isentress, as well as oxycodone. In addition, on
9 or about January 8, 2015, SEVAK GHARGHANI, on KARAPEDYAN's behalf, delivered several
10 bottles of the cancer medication Gleevec to a purchaser in the Northern District of California.
11 KARAPEDYAN also sold more than \$2 million of drugs from his pizza restaurant in Glendale,
12 California, on or about May 4, 2015.

13 18. In addition, ARA KARAPEDYAN and MAXWELL STARKY, from in or about
14 October 2014 through in or about January 2015, provided ME Wholesale with more than \$1 million
15 worth of improperly procured drugs.

16 19. Furthermore, ARA KARAPEDYAN also supplied MIHRAN STEPANYAN and
17 ARTUR STEPANYAN with drugs in or about 2014.

18 Negotiation of Fraudulent Checks

19 20. From at least in or about September 2012 through in or about November 2014, ARA
20 KARAPEDYAN, GEVORK TER-MKRTCHYAN, KHACHIG GEUYDIJIAN, ARMAN
21 PETROYSAN, LANNA KARAPEDYAN, MAXWELL STARKY, SEVAK GHARGHANI, JEAN
22 DUKMAJIAN, KARINE DUKMAJIAN, ANGELA DUKMAJIAN, ASATOUR MAGZANYAN,
23 TIGRAN SARKISYAN, HRIPSIME KHACHTRYAN, LOUI ARTIN, HUGO MARQUEZ, ARMAN
24 ZARGARYAN, DMITRIY KUSTOV, MICHAEL INMAN, and their associates negotiated and
25 attempted to negotiate in excess of 500 fraudulent checks totaling more than \$5 million and issued to a
26 variety of payees. ARA KARAPEDYAN, PETROYSAN, LANNA KARAPEDYAN, and
27 GHARGHANI delivered, and sent via mail, many of these checks to the Northern District of California
28 to be negotiated. ARA KARAPEDYAN, PETROYSAN, LANNA KARAPEDYAN, and

1 GHARGHANI also traveled to the Northern District of California to pick up cash derived from the
2 negotiation of these checks.

3 21. A substantial portion of the fraudulent checks were tax refund checks sent by mail by the
4 United States Treasury, and many of these tax refund checks had been issued based on fraudulent tax
5 returns filed with the Internal Revenue Service. ASATOUR MAGZANYAN, TIGRAN SARKISYAN,
6 HRIPSIME KHACHTRYAN, and KHACHIG GEUYDIJIAN, among others, acquired and possessed
7 identifying information for dozens of individuals, which was used to file fraudulent tax returns online.
8 GEUYDIJIAN also used his mailbox business Mailworks, Etc., as the address of record for many such
9 tax filings and as the address to where tax return checks were to be sent. For example, set forth in the
10 following table are fifty-one tax refund checks totaling approximately \$582,052.36 sent through the mail
11 by the United States Treasury as a result of the filing of fraudulent tax return documents, which
12 KARAPEDYAN delivered to the Northern District of California to be negotiated:

Check Number	Check Date	Check Amount
4500-08313952	05/17/2013	\$6,462.94
3158-68155188	05/17/2013	\$8,159.04
3158-68443706	05/20/2013	\$9,275.84
4500-56005433	04/19/2013	\$20,320.00
3158-60807022	04/19/2013	\$22,429.00
3158-58471443	04/12/2013	\$25,084.00
3158-56479608	04/05/2013	\$25,515.00
3158-68572295	05/22/2013	\$1,492.00
3158-68888078	05/24/2013	\$3,719.00
3158-68893904	05/24/2013	\$7,741.00
3158-68266226	05/17/2013	\$10,468.68
3158-63735257	04/26/2013	\$14,984.00
3158-66059051	05/06/2013	\$23,625.00
3158-66059050	05/06/2013	\$24,097.46
3158-66141009	05/06/2013	\$25,573.00
3158-66768123	05/10/2013	\$24,362.00
3158-58833121	04/15/2013	\$25,025.00
3158-69835265	06/07/2013	\$25,571.45
3158-67101159	05/10/2013	\$25,607.16
3161-01614535	08/23/2013	\$2,169.00
3158-65847079	05/03/2013	\$3,564.00
3158-65876781	05/03/2013	\$3,706.00
3158-71325746	07/08/2013	\$4,477.61
4500-55912111	12/17/2012	\$6,682.00
3158-42058313	12/07/2012	\$7,424.83
3158-42329256	12/21/2012	\$7,431.00
3158-42488640	12/31/2012	\$7,451.00

Check Number	Check Date	Check Amount
3158-42488638	12/31/2012	\$7,471.00
3158-41907640	11/30/2012	\$7,491.00
3161-01852740	09/03/2013	\$3,795.34
3161-01833316	08/30/2013	\$6,080.26
3161-01833630	08/30/2013	\$8,073.00
4034-00428527	09/13/2013	\$2,195.65
4034-00428535	09/13/2013	\$3,308.47
4034-00621000	09/20/2013	\$6,202.00
4034-00823740	09/27/2013	\$5,002.00
4034-00619939	09/20/2013	\$6,816.00
4034-00619945	09/20/2013	\$7,106.00
4034-00619940	09/20/2013	\$8,091.00
4034-00619946	09/20/2013	\$8,221.00
4034-00619935	09/20/2013	\$8,416.00
4034-01056506	10/07/2013	\$7,466.00
4034-01467808	10/25/2013	\$4,424.00
4034-01409029	10/25/2013	\$9,669.62
4034-02194382	11/14/2013	\$7,707.69
4500-69271152	09/13/2013	\$7,870.32
3158-42681732	01/30/2013	\$8,436.00
3158-60836989	04/19/2013	\$4,008.00
3158-60807020	04/19/2013	\$23,831.00
3158-60807028	04/19/2013	\$24,651.00
3158-61221588	04/22/2013	\$23,303.00

22. Tax refund checks procured through the filing of fraudulent tax filings, however, were not the only checks from which the defendant sought to profit. For instance, GEVORK TER-MKRTCHYAN provided checks either issued from a bank account maintained under the name for his non-profit clinic, All Care One Community Health, or issued to All Care One Community Health as the payee. In addition, MICHAEL INMAN in 2013 stole several high-value cashier's checks from a woman, which ARMAN ZARGARYAN and DMITRIY KUSTOV used to fund a bank account created under the woman's name from which they wrote checks. Furthermore, in or about March 2014, KHACHIG GEUYDIJIAN attempted to negotiate two high-value tax return checks that had simply been stolen from their rightful owners, one of whom was a movie director, the other, the drummer of a popular band. For example, set forth in the following table are twelve fraudulent checks totaling approximately \$107,656.79 that were delivered to the Northern District of California to be negotiated:

//

Bank/Check Number	Check Date	Check Amount
JP Morgan/1090	05/22/2013	\$5,186.19
JP Morgan/1089	05/19/2013	\$4,980.60
Hanin Credit Union/103798	09/11/2013	\$18,254.00
Hanin Credit Union/103796	09/11/2013	\$20,147.00
Hanin Credit Union/103802	09/11/2013	\$21,457.00
Hanin Credit Union/103800	09/11/2013	\$20,487.00
Well Fargo/5693	09/11/2013	\$2,100.00
Well Fargo/5492	07/02/2013	\$5,100.00
Well Fargo/5330	05/06/2013	\$1,700.00
Well Fargo/6792	09/13/2013	\$3,500.00
Well Fargo/6795	09/13/2013	\$3,500.00
Well Fargo/3033	09/17/2013	\$1,245.00

23. The negotiation of fraudulent checks was also facilitated by JEAN DUKMAJIAN, KARINE DUKMAJIAN, and ANGELA DUKMAJIAN through their business, Duke's Check Cashing. The DUKMAJIANs allowed ARA KARAPEDYAN and his associates to negotiate numerous fraudulent checks through Duke's Check Cashing in exchange for a percentage of the proceeds. ANGELA DUKMAJIAN, Duke's Check Cashing's anti-money laundering and compliance officer, also inaccurately prepared records that were required to be provided to federal authorities in order to conceal their scheme.

Money Laundering

24. The defendants' drug distribution and check fraud schemes generated substantial amounts of cash, and they sought to launder their illicit proceeds by transferring the money through various bank accounts opened under the names of various businesses and numerous individuals' identities.

25. For instance, between in or about August 2013 and in or about January 2014, MIHRAN STEPANYAN's drug wholesale company, GC National Wholesale, wired approximately \$1,303,149.98 to a business to which ARA KARAPEDYAN had access. KARAPEDYAN caused almost all of these wire transfers to be converted into cash, much of which KARAPEDYAN picked up in the Northern District of California, including on or about August 16, 23, and 30, 2013, September 6 and 26, 2013, October 3, 15, and 22, 2013, November 8 and 12, 2013, and December 5 and 23, 2013. Set forth in the following table are the wire transfers from GC National Wholesale:

//

Date of Financial Transaction	Type of Financial Transaction	Amount of Financial Transaction
08/12/2013	Wire Transfer	\$100,005.50
08/12/2013	Wire Transfer	\$80,382.05
08/12/2013	Wire Transfer	\$59,300.10
08/12/2013	Wire Transfer	\$49,997.10
08/15/2013	Wire Transfer	\$104,556.99
08/28/2013	Wire Transfer	\$102,225.97
08/28/2013	Wire Transfer	\$50,008.50
09/20/2013	Wire Transfer	\$61,424.25
09/27/2013	Wire Transfer	\$5,674.25
10/08/2013	Wire Transfer	\$50,001.10
10/08/2013	Wire Transfer	\$150,005.10
10/31/2013	Wire Transfer	\$96,397.20
10/31/2013	Wire Transfer	\$97,105.10
11/19/2013	Wire Transfer	\$113,376.00
12/23/2013	Wire Transfer	\$32,680.17
01/10/2014	Wire Transfer	\$61,205.10
01/10/2014	Wire Transfer	\$88,805.50

26. Similarly, in September 2014, MIHRAN STEPANYAN asked KARAPEDYAN to launder more money, this time, from another one of STEPANYAN's companies, Nationwide Payment Solutions. KARAPEDYAN, however, did not end up receiving any money from Nationwide Payment Solutions. Rather, at least some of the money from Nationwide Payment Solutions was transferred by wire to purchase make millions of dollars of gold by someone known only as "Gary" to the gold seller.

27. Similarly, between in or about October 2014 and in or about February 2015, ME Wholesale wired approximately \$1,227,500 to another business to which KARAPEDYAN had access. KARADPEYAN caused almost all of these wire transfers to be converted into cash or to be sent as further wire transfers to other bank accounts maintained under such names as "Sevak Gharghani," "LG

1 Construction,” “American Eagle Coins,” “Starsky Development Group,” “Hovik’s Billing Service,” and
 2 “MJ Trade Group.” KARAPEDYAN picked up much of the cash in the Northern District of California,
 3 including on or about November 14 and 24, 2014, and December 8 and 22, 2014, while his associates,
 4 such as SEVAK GHARGHANI, MAXWELL STARSKY, and LOUI ARTIN, accessed the money that
 5 had been wired into the bank accounts. Set forth in the following table are the wire transfers from ME
 6 Wholesale:

Date of Financial Transaction	Type of Financial Transaction	Amount of Financial Transaction
10/29/2014	Wire Transfer	\$20,000.00
11/07/2014	Wire Transfer	\$370,000.00
11/13/2014	Wire Transfer	\$198,000.00
11/17/2014	Wire Transfer	\$90,000.00
11/21/2014	Wire Transfer	\$6,700.00
12/01/2014	Wire Transfer	\$143,000.00
12/03/2014	Wire Transfer	\$198,000.00
12/10/2014	Wire Transfer	\$140,000.00
12/17/2014	Wire Transfer	\$55,000.00
02/05/2015	Wire Transfer	\$6,800.00

Murder-For-Hire

20 28. From in or about August 2014 through in or about November 2014, ARA
 21 KARAPEDYAN and GEVORK TER-MKRTCHYAN sought individuals who would be willing to kill
 22 someone who had angered TER-MKRTCHYAN (the “Victim”). During these months,
 23 KARAPEDYAN and TER-MKRTCHYAN made numerous calls to the Northern District of California
 24 seeking individuals willing to carry out the attack, and they eventually agreed to pay \$1,500 for the task.
 25 The attack on the Victim was never carried out.

26 COUNT ONE: (18 U.S.C. § 1962(d) – Racketeering Conspiracy)

The Racketeering Enterprise

28 29. Defendants ARA KARAPEDYAN, MIHRAN STEPANYAN, ARTUR STEPANYAN,

1 GEVORK TER-MKRTCHYAN, KHACHIG GEUYDIJIAN, ARMAN PETROYSAN, LANNA
2 ARAPEDYAN, MAXWELL STARKY, SEVAK GHARGHANI, JEAN DUKMAJIAN, KARINE
3 DUKMAJIAN, ANGELA DUKMAJIAN, ARMAN DANIELIAN, ASATOUR MAGZANYAN,
4 TIGRAN SARKISYAN, HRIPSIME KHACHTRYAN, LOUI ARTIN, HUGO MARQUEZ, ARMAN
5 ZARGARYAN, DMITRIY KUSTOV, and DAVID MILLER, and the entities owned, operated, and
6 controlled by them, including All Care One Community Health, Legal-Act Entities, Mailworks, Etc., All
7 American Real Estate Company, Pro Serve Entities, Inc., Duke's Check Cashing, LG Construction,
8 American Eagle Coins, Starsky Development Group, Hovik's Billing Service, MJ Trade Group, Niva
9 Pharmaceuticals, Nuvo Pharmaceuticals, Red Rock Capital, Trans Atlantic Capital, GC National
10 Wholesale, Sky Atlantic Capital, Nationwide Payment Solutions, Apex Pharmaceuticals, Maroon
11 Pharma, ME Wholesale, MIC, B&Y Wholesale Distributors, and FMC Distributors, together with others
12 known and unknown, comprised the "Karapedyan-Stepanyan Enterprise." The Karapedyan-Stepanyan
13 Enterprise, including its leadership, members, and associates, in the Northern District of California and
14 elsewhere, constituted an "enterprise" as defined in Title 18, United States Code, Section 1961(4), that
15 is, a group of individuals and entities associated in fact. The enterprise constituted an ongoing
16 organization whose members functioned as a continuing unit for a common purpose of achieving the
17 objectives of the enterprise. The enterprise engaged in, and its activities affected, interstate and foreign
18 commerce.

19 Purposes of the Enterprise

20 30. The purposes of the Karapedyan-Stepanyan Enterprise included but were not limited to
21 the following:

22 a. Obtaining profits and property for its members and associates through the
23 commission of criminal acts, including, but not limited to, identity theft, fraudulent use of access
24 devices, mail, wire, and bank fraud, the unlicensed wholesale distribution of drugs, and money
25 laundering;

26 b. Promoting and enhancing the enterprise and the activities of its members and
27 associates;

28 c. Providing assistance to other enterprise members and associates in order to

1 hinder, obstruct, and prevent law enforcement officers from identifying the offenders, apprehending the
2 offenders, and successfully prosecuting and punishing the offenders;

3 d. Eliminating through violence and the threat of violence individuals who opposed
4 or angered enterprise members and associates.

5 Means and Methods of the Enterprise

6 31. Among the means and methods by which the members and associates of the Karapedyan-
7 Stepanyan Enterprise conducted and participated in the conduct of the affairs of the enterprise were the
8 following:

9 a. The members and associates of the Karapedyan-Stepanyan Enterprise used false
10 and stolen identities and fraudulent and unauthorized access devices, such as Social Security and bank
11 account numbers, to negotiate stolen and counterfeit checks.

12 b. The members and associates of the Karapedyan-Stepanyan Enterprise used false
13 and stolen identities and fraudulent and unauthorized access devices, such as Social Security and Tax
14 Identification numbers, to file fraudulent federal tax returns in order to induce the United States
15 Treasury to issue tax refund checks through the mail.

16 c. The members and associates of the Karapedyan-Stepanyan Enterprise used false
17 and stolen identities to create bank accounts through which they could negotiate stolen and counterfeit
18 checks as well as launder money.

19 d. The members and associates of the Karapedyan-Stepanyan Enterprise created
20 shell businesses to engage in the sale of improperly procured and handled drugs.

21 e. The members and associates of the Karapedyan-Stepanyan Enterprise created
22 false drug pedigree information that they sent to customers via mail or e-mail and posted on a web site
23 to facilitate their sales of improperly procured and handled drugs.

24 f. The members and associates of the Karapedyan-Stepanyan Enterprise created
25 documents containing false information, such as fraudulent invoices, false contracts, and other
26 fraudulent business records, in order to facilitate their criminal activities.

27 The Racketeering Conspiracy

28 32. From at least in or about 2009, up through and including on or about May 6, 2015, in the

1 Northern District of California and elsewhere, the defendants,

2 (1) ARA KARAPEDYAN,

3 (2) MIHRAN STEPANYAN,

4 (3) ARTUR STEPANYAN,

5 (4) GEVORK TER-MKRTCHYAN,

6 (5) KHACHIG GEUYDIJIAN,

7 (6) ARMAN PETROYSAN,

8 (7) LANNA KARAPEDYAN,

9 (8) MAXWELL STARKY,

10 (9) SEVAK GHARGHANI,

11 (10) JEAN DUKMAJIAN,

12 (11) KARINE DUKMAJIAN,

13 (12) ANGELA DUKMAJIAN,

14 (13) ARMAN DANIELIAN,

15 (14) ASATOUR MAGZANYAN,

16 (15) TIGRAN SARKISYAN,

17 (16) HRIPSIME KHACHTRYAN,

18 (17) LOUI ARTIN,

19 (18) HUGO MARQUEZ,

20 (19) ARMAN ZARGARYAN,

21 (20) DMITRIY KUSTOV, and

22 (21) DAVID MILLER

23 and others known and unknown, being persons employed by and associated with the enterprise

24 described above, namely, the Karapedyan-Stepanyan Enterprise, which enterprise was engaged in, and

25 the activities of which affected, interstate and foreign commerce, unlawfully and knowingly combined,

26 conspired, confederated, and agreed together and with each other to conduct and participate, directly and

27 indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity, which

28 pattern of racketeering consisted of:

1 a. multiple acts and threats involving murder under Sections 187, 189, 182, 21a,
2 664, 653f(b), and 31 of the California Penal Code; and

3 b. multiple acts indictable under Title 18, United States Code, Sections 1028, 1029,
4 1341, 1343, 1344, 1956, 1957, and 1958.

5 33. It was part of the conspiracy that each defendant agreed that a conspirator would commit
6 at least two acts of racketeering activity in the conduct of the affairs of the enterprise.

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

8 COUNT TWO: (18 U.S.C. § 1028(f) – Conspiracy to Commit Identity Theft)

9 34. Paragraphs 1 through 31 of this Indictment are realleged, repeated, and incorporated by
10 reference as though fully set forth herein.

11 35. From at least in or about 2009, up through and including on or about May 6, 2015, in the
12 Northern District of California and elsewhere, the defendants,

13 (1) ARA KARAPEDYAN,

14 (2) MIHRAN STEPANYAN,

15 (3) ARTUR STEPANYAN,

16 (4) GEVORK TER-MKRTCHYAN,

17 (5) KHACHIG GEUYDIJIAN,

18 (6) ARMAN PETROYSAN,

19 (7) LANNA KARAPEDYAN,

20 (8) MAXWELL STARKY,

21 (9) SEVAK GHARGHANI,

22 (10) JEAN DUKMAJIAN,

23 (11) KARINE DUKMAJIAN,

24 (12) ANGELA DUKMAJIAN,

25 (13) ARMAN DANIELIAN,

26 (14) ASATOUR MAGZANYAN,

27 (15) TIGRAN SARKISYAN,

28 (16) HRIPSIME KHACHTRYAN,

1 (17) LOUI ARTIN,

2 (18) HUGO MARQUEZ,

3 (19) ARMAN ZARGARYAN,

4 (20) DMITRIY KUSTOV, and

5 (21) DAVID MILLER,

6 and others known and unknown, unlawfully and knowingly combined, conspired, confederated, and
7 agreed together and with each other to violate Title 18, United States Code, Section 1028(a)(1), (4), and
8 (7).

9 36. It was a part and an object of the conspiracy that the defendants,

10 (1) ARA KARAPEDYAN,

11 (2) MIHRAN STEPANYAN,

12 (3) ARTUR STEPANYAN,

13 (4) GEVORK TER-MKRTCHYAN,

14 (5) KHACHIG GEUYDIJIAN,

15 (6) ARMAN PETROYSAN,

16 (7) LANNA KARAPEDYAN,

17 (8) MAXWELL STARKY,

18 (9) SEVAK GHARGHANI,

19 (10) JEAN DUKMAJIAN,

20 (11) KARINE DUKMAJIAN,

21 (12) ANGELA DUKMAJIAN,

22 (13) ARMAN DANIELIAN,

23 (14) ASATOUR MAGZANYAN,

24 (15) TIGRAN SARKISYAN,

25 (16) HRIPSIME KHACHTRYAN,

26 (17) LOUI ARTIN,

27 (18) HUGO MARQUEZ,

28 (19) ARMAN ZARGARYAN,

1 (20) DMITRIY KUSTOV, and
2 (21) DAVID MILLER,
3 and others known and unknown, unlawfully and knowingly would and did possess with intent to use
4 unlawfully five and more identification documents other than one issued lawfully for the use of the
5 possessor, authentication features, and false identification documents, in violation of Title 18, United
6 States Code, 1028(a)(3).

7 37. It was further a part and an object of the conspiracy that the defendants,

- 8 (1) ARA KARAPEDYAN,
9 (2) MIHRAN STEPANYAN,
10 (3) ARTUR STEPANYAN,
11 (4) GEVORK TER-MKRTCHYAN,
12 (5) KHACHIG GEUYDIJIAN,
13 (6) ARMAN PETROYSAN,
14 (7) LANNA KARAPEDYAN,
15 (8) MAXWELL STARSKY,
16 (9) SEVAK GHARGHANI,
17 (10) JEAN DUKMAJIAN,
18 (11) KARINE DUKMAJIAN,
19 (12) ANGELA DUKMAJIAN,
20 (13) ARMAN DANIELIAN,
21 (14) ASATOUR MAGZANYAN,
22 (15) TIGRAN SARKISYAN,
23 (16) HRIPSIME KHACHTRYAN,
24 (17) LOUI ARTIN,
25 (18) HUGO MARQUEZ,
26 (19) ARMAN ZARGARYAN,
27 (20) DMITRIY KUSTOV, and
28 (21) DAVID MILLER,

1 and others known and unknown, unlawfully and knowingly would and did possess an identification
2 document other than one issued lawfully for the use of the possessor, authentication feature, and false
3 identification document, with the intent such document and feature be used to defraud the United States,
4 in violation of Title 18, United States Code, 1028(a)(4).

5 38. It was further a part and an object of the conspiracy that the defendants,

- 6 (1) ARA KARAPEDYAN,
- 7 (2) MIHRAN STEPANYAN,
- 8 (3) ARTUR STEPANYAN,
- 9 (4) GEVORK TER-MKRTCHYAN,
- 10 (5) KHACHIG GEUYDIJIAN,
- 11 (6) ARMAN PETROYSAN,
- 12 (7) LANNA KARAPEDYAN,
- 13 (8) MAXWELL STARSKY,
- 14 (9) SEVAK GHARGHANI,
- 15 (10) JEAN DUKMAJIAN,
- 16 (11) KARINE DUKMAJIAN,
- 17 (12) ANGELA DUKMAJIAN,
- 18 (13) ARMAN DANIELIAN,
- 19 (14) ASATOUR MAGZANYAN,
- 20 (15) TIGRAN SARKISYAN,
- 21 (16) HRIPSIME KHACHTRYAN,
- 22 (17) LOUI ARTIN,
- 23 (18) HUGO MARQUEZ,
- 24 (19) ARMAN ZARGARYAN,
- 25 (20) DMITRIY KUSTOV, and
- 26 (21) DAVID MILLER,

27 and others known and unknown, unlawfully and knowingly would and did transfer, possess, and use,
28 without lawful authority, a means of identification of another person with the intent to commit, and to

1 aid and abet, and in connection with, any unlawful activity that constitutes a violation of Federal law, in
2 violation of Title 18, United States Code, 1028(a)(7).

3 All in violation of Title 18, United States Code, Section 1028(f).

4 COUNT THREE: (18 U.S.C. § 1029(b)(2) – Conspiracy to Commit Access Device Fraud)

5 39. Paragraphs 1 through 31 of this Indictment are realleged, repeated, and incorporated by
6 reference as though fully set forth herein.

7 40. From at least in or about 2009, up through and including on or about May 6, 2015, in the
8 Northern District of California and elsewhere, the defendants,

- 9 (1) ARA KARAPEDYAN,
10 (2) MIHRAN STEPANYAN,
11 (3) ARTUR STEPANYAN,
12 (4) GEVORK TER-MKRTCHYAN,
13 (5) KHACHIG GEUYDIJIAN,
14 (6) ARMAN PETROYSAN,
15 (7) LANNA KARAPEDYAN,
16 (8) MAXWELL STARKY,
17 (9) SEVAK GHARGHANI,
18 (10) JEAN DUKMAJIAN,
19 (11) KARINE DUKMAJIAN,
20 (12) ANGELA DUKMAJIAN,
21 (13) ARMAN DANIELIAN,
22 (14) ASATOUR MAGZANYAN,
23 (15) TIGRAN SARKISYAN,
24 (16) HRIPSIME KHACHTRYAN,
25 (17) LOUI ARTIN,
26 (18) HUGO MARQUEZ,
27 (19) ARMAN ZARGARYAN,
28 (20) DMITRIY KUSTOV, and

1 (21) DAVID MILLER,
2 and others known and unknown, unlawfully and knowingly combined, conspired, confederated, and
3 agreed together and with each other to violate Title 18, United States Code, Section 1029(a)(1), (2), (3)
4 and (5).

5 41. It was a part and an object of the conspiracy that the defendants,

- 6 (1) ARA KARAPEDYAN,
7 (2) MIHRAN STEPANYAN,
8 (3) ARTUR STEPANYAN,
9 (4) GEVORK TER-MKRTCHYAN,
10 (5) KHACHIG GEUYDIJIAN,
11 (6) ARMAN PETROYSAN,
12 (7) LANNA KARAPEDYAN,
13 (8) MAXWELL STARKY,
14 (9) SEVAK GHARGHANI,
15 (10) JEAN DUKMAJIAN,
16 (11) KARINE DUKMAJIAN,
17 (12) ANGELA DUKMAJIAN,
18 (13) ARMAN DANIELIAN,
19 (14) ASATOUR MAGZANYAN,
20 (15) TIGRAN SARKISYAN,
21 (16) HRIPSIME KHACHTRYAN,
22 (17) LOUI ARTIN,
23 (18) HUGO MARQUEZ,
24 (19) ARMAN ZARGARYAN,
25 (20) DMITRIY KUSTOV, and
26 (21) DAVID MILLER,

27 and others known and unknown, unlawfully and knowingly, and with intent to defraud, would and did
28 use one and more counterfeit access devices, in violation of Title 18, United States Code, 1029(a)(1).

1 42. It was further a part and an object of the conspiracy that the defendants,

2 (1) ARA KARAPEDYAN,

3 (2) MIHRAN STEPANYAN,

4 (3) ARTUR STEPANYAN,

5 (4) GEVORK TER-MKRTCHYAN,

6 (5) KHACHIG GEUYDIJIAN,

7 (6) ARMAN PETROYSAN,

8 (7) LANNA KARAPEDYAN,

9 (8) MAXWELL STARKY,

10 (9) SEVAK GHARGHANI,

11 (10) JEAN DUKMAJIAN,

12 (11) KARINE DUKMAJIAN,

13 (12) ANGELA DUKMAJIAN,

14 (13) ARMAN DANIELIAN,

15 (14) ASATOUR MAGZANYAN,

16 (15) TIGRAN SARKISYAN,

17 (16) HRIPSIME KHACHTRYAN,

18 (17) LOUI ARTIN,

19 (18) HUGO MARQUEZ,

20 (19) ARMAN ZARGARYAN,

21 (20) DMITRIY KUSTOV, and

22 (21) DAVID MILLER,

23 and others known and unknown, unlawfully and knowingly, and with intent to defraud, would and did
24 use one and more unauthorized access devices during a one-year period, and by such conduct, obtained
25 anything of value aggregating \$1,000 and more during that period, in violation of Title 18, United States
26 Code, 1029(a)(2).

27 43. It was further a part and an object of the conspiracy that the defendants,

28 (1) ARA KARAPEDYAN,

- 1 (2) MIHRAN STEPANYAN,
- 2 (3) ARTUR STEPANYAN,
- 3 (4) GEVORK TER-MKRTCHYAN,
- 4 (5) KHACHIG GEUYDIJIAN,
- 5 (6) ARMAN PETROYSAN,
- 6 (7) LANNA KARAPEDYAN,
- 7 (8) MAXWELL STARKY,
- 8 (9) SEVAK GHARGHANI,
- 9 (10) JEAN DUKMAJIAN,
- 10 (11) KARINE DUKMAJIAN,
- 11 (12) ANGELA DUKMAJIAN,
- 12 (13) ARMAN DANIELIAN,
- 13 (14) ASATOUR MAGZANYAN,
- 14 (15) TIGRAN SARKISYAN,
- 15 (16) HRIPSIME KHACHTRYAN,
- 16 (17) LOUI ARTIN,
- 17 (18) HUGO MARQUEZ,
- 18 (19) ARMAN ZARGARYAN,
- 19 (20) DMITRIY KUSTOV, and
- 20 (21) DAVID MILLER,

21 and others known and unknown, unlawfully and knowingly, and with intent to defraud, would and did
22 possess fifteen and more devices which were counterfeit and unauthorized access devices, in violation of
23 Title 18, United States Code, 1029(a)(3).

24 44. It was further a part and an object of the conspiracy that the defendants,

- 25 (1) ARA KARAPEDYAN,
- 26 (2) MIHRAN STEPANYAN,
- 27 (3) ARTUR STEPANYAN,
- 28 (4) GEVORK TER-MKRTCHYAN,

- 1 (5) KHACHIG GEUYDIJIAN,
- 2 (6) ARMAN PETROYSAN,
- 3 (7) LANNA KARAPEDYAN,
- 4 (8) MAXWELL STARSKY,
- 5 (9) SEVAK GHARGHANI,
- 6 (10) JEAN DUKMAJIAN,
- 7 (11) KARINE DUKMAJIAN,
- 8 (12) ANGELA DUKMAJIAN,
- 9 (13) ARMAN DANIELIAN,
- 10 (14) ASATOUR MAGZANYAN,
- 11 (15) TIGRAN SARKISYAN,
- 12 (16) HRIPSIME KHACHTRYAN,
- 13 (17) LOUI ARTIN,
- 14 (18) HUGO MARQUEZ,
- 15 (19) ARMAN ZARGARYAN,
- 16 (20) DMITRIY KUSTOV, and
- 17 (21) DAVID MILLER,

18 and others known and unknown, unlawfully and knowingly, and with intent to defraud, would and did
19 effect transactions, with 1 and more access devices issued to another person, to receive payment and any
20 other thing of value during any 1-year period the aggregate value of which was equal to and greater than
21 \$1,000, in violation of Title 18, United States Code, 1029(a)(5).

22 Overt Acts

23 45. In furtherance of the conspiracy, and to effect the illegal objects thereof, the following
24 overt acts, among others, were committed in the Northern District of California:

25 a. On or about October 17, 2012, SEVAK GHARGHANI delivered checks to the
26 Northern District of California.

27 b. On or about September 12, 2013, ARA KARAPEDYAN picked up cash and
28 delivered checks in the Northern District of California.

1 c. On or about October 15, 2013, ARA KARAPEDYAN picked up cash and
2 delivered checks in the Northern District of California.

3 d. On or about October 22, 2013, ARA KARAPEDYAN picked up cash and
4 delivered a check in the Northern District of California.

5 e. On or about November 26, 2013, ARMAN PATROYSAN and LANNA
6 KARAPEDYAN picked up cash in the Northern District of California.

7 f. On or about November 26, 2013, LANNA KARAPEDYAN called ARA
8 KARAPEDYAN from the Northern District of California.

9 g. On or about December 20, 2013, ARA KARAPEDYAN picked up cash and
10 delivered checks in the Northern District of California.

11 h. On or about November 24, 2014, ARA KARAPEDYAN picked up cash and
12 delivered checks in the Northern District of California.

13 All in violation of Title 18, United States Code, Section 1029(b)(2).

14 COUNT FOUR: (18 U.S.C. § 1349 – Conspiracy to Commit Mail, Wire, and Bank Fraud)

15 46. Paragraphs 1 through 31 of this Indictment are realleged, repeated, and incorporated by
16 reference as though fully set forth herein.

17 47. From at least in or about 2009, up through and including on or about May 6, 2015, in the
18 Northern District of California and elsewhere, the defendants,

19 (1) ARA KARAPEDYAN,

20 (2) MIHRAN STEPANYAN,

21 (3) ARTUR STEPANYAN,

22 (4) GEVORK TER-MKRTCHYAN,

23 (5) KHACHIG GEUYDIJIAN,

24 (6) ARMAN PETROYSAN,

25 (7) LANNA KARAPEDYAN,

26 (8) MAXWELL STARKY,

27 (9) SEVAK GHARGHANI,

28 (10) JEAN DUKMAJIAN,

- 1 (11) KARINE DUKMAJIAN,
- 2 (12) ANGELA DUKMAJIAN,
- 3 (13) ARMAN DANIELIAN,
- 4 (14) ASATOUR MAGZANYAN,
- 5 (15) TIGRAN SARKISYAN,
- 6 (16) HRIPSIME KHACHTRYAN,
- 7 (17) LOUI ARTIN,
- 8 (18) HUGO MARQUEZ,
- 9 (19) ARMAN ZARGARYAN,
- 10 (20) DMITRIY KUSTOV,
- 11 (21) MICHAEL INMAN,
- 12 (22) ARAXIA NAZARYIAN,
- 13 (23) ALEXANDER SOLIMAN,
- 14 (24) CHERYL BARNDT,
- 15 (25) ERIC FIGUEROA,
- 16 (26) MARC ASHEGHIAN,
- 17 (27) MICHAEL ASHEGHIAN,
- 18 (28) DAVID MILLER,
- 19 (29) JAMES RUSSO,
- 20 (30) JEANNETTE COUCH,
- 21 (31) MARIE POLICHETTI,
- 22 (32) BERNARDO GUILLEN, and
- 23 (33) JAVIER RAMIREZ,

24 and others known and unknown, unlawfully and knowingly combined, conspired, confederated, and
25 agreed together and with each other to violate Title 18, United States Code, Sections 1341, 1343, and
26 1344.

27 48. It was a part and an object of the conspiracy that the defendants,

- 28 (1) ARA KARAPEDYAN,

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- (2) MIHRAN STEPANYAN,
- (3) ARTUR STEPANYAN,
- (4) GEVORK TER-MKRTCHYAN,
- (5) KHACHIG GEUYDIJIAN,
- (6) ARMAN PETROYSAN,
- (7) LANNA KARAPEDYAN,
- (8) MAXWELL STARKY,
- (9) SEVAK GHARGHANI,
- (10) JEAN DUKMAJIAN,
- (11) KARINE DUKMAJIAN,
- (12) ANGELA DUKMAJIAN,
- (13) ARMAN DANIELIAN,
- (14) ASATOUR MAGZANYAN,
- (15) TIGRAN SARKISYAN,
- (16) HRIPSIME KHACHTRYAN,
- (17) LOUI ARTIN,
- (18) HUGO MARQUEZ,
- (19) ARMAN ZARGARYAN,
- (20) DMITRIY KUSTOV,
- (21) MICHAEL INMAN,
- (22) ARAXIA NAZARYIAN,
- (23) ALEXANDER SOLIMAN,
- (24) CHERYL BARNDT,
- (25) ERIC FIGUEROA,
- (26) MARC ASHEGHIAN,
- (27) MICHAEL ASHEGHIAN,
- (28) DAVID MILLER,
- (29) JAMES RUSSO,

1 (30) JEANNETTE COUCH,

2 (31) MARIE POLICHETTI,

3 (32) BERNARDO GUILLEN, and

4 (33) JAVIER RAMIREZ,

5 and others known and unknown, unlawfully and knowingly, having devised and intending to devise a
6 scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent
7 pretenses, representations, and promises, for the purpose of executing such scheme and artifice would
8 and did place in a post office and authorized depository for mail matter, a matter and thing whatever to
9 be sent and delivered by the Postal Service and a private and commercial interstate carrier, and take and
10 receive therefrom, a matter and thing, and knowingly cause to be delivered by mail and such carrier
11 according to the direction thereon, and at the place at which it is directed to be delivered by the person to
12 whom it is addressed, a matter and thing, in violation of Title 18, United States Code, Section 1341.

13 49. It was further a part and an object of the conspiracy that the defendants,

14 (1) ARA KARAPEDYAN,

15 (2) MIHRAN STEPANYAN,

16 (3) ARTUR STEPANYAN,

17 (4) GEVORK TER-MKRTCHYAN,

18 (5) KHACHIG GEUYDIJIAN,

19 (6) ARMAN PETROYSAN,

20 (7) LANNA KARAPEDYAN,

21 (8) MAXWELL STARKY,

22 (9) SEVAK GHARGHANI,

23 (10) JEAN DUKMAJIAN,

24 (11) KARINE DUKMAJIAN,

25 (12) ANGELA DUKMAJIAN,

26 (13) ARMAN DANIELIAN,

27 (14) ASATOUR MAGZANYAN,

28 (15) TIGRAN SARKISYAN,

- 1 (16) HRIPSIME KHACHTRYAN,
2 (17) LOUI ARTIN,
3 (18) HUGO MARQUEZ,
4 (19) ARMAN ZARGARYAN,
5 (20) DMITRIY KUSTOV,
6 (21) MICHAEL INMAN,
7 (22) ARAXIA NAZARYIAN,
8 (23) ALEXANDER SOLIMAN,
9 (24) CHERYL BARNDT,
10 (25) ERIC FIGUEROA,
11 (26) MARC ASHEGHIAN,
12 (27) MICHAEL ASHEGHIAN,
13 (28) DAVID MILLER,
14 (29) JAMES RUSSO,
15 (30) JEANNETTE COUCH,
16 (31) MARIE POLICHETTI,
17 (32) BERNARDO GUILLEN, and
18 (33) JAVIER RAMIREZ,

19 and others known and unknown unlawfully and knowingly, having devised and intending to devise a
20 scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent
21 pretenses, representations, and promises, would and did transmit and cause to be transmitted by means
22 of wire, radio, and television communication in interstate and foreign commerce, writings, signs,
23 signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title
24 18, United States Code, Section 1341.

25 50. It was further a part and an object of the conspiracy that the defendants,

- 26 (1) ARA KARAPEDYAN,
27 (2) MIHRAN STEPANYAN,
28 (3) ARTUR STEPANYAN,

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- (4) GEVORK TER-MKRTCHYAN,
- (5) KHACHIG GEUYDIJIAN,
- (6) ARMAN PETROYSAN,
- (7) LANNA KARAPEDYAN,
- (8) MAXWELL STARSKY,
- (9) SEVAK GHARGHANI,
- (10) JEAN DUKMAJIAN,
- (11) KARINE DUKMAJIAN,
- (12) ANGELA DUKMAJIAN,
- (13) ARMAN DANIELIAN,
- (14) ASATOUR MAGZANYAN,
- (15) TIGRAN SARKISYAN,
- (16) HRIPSIME KHACHTRYAN,
- (17) LOUI ARTIN,
- (18) HUGO MARQUEZ,
- (19) ARMAN ZARGARYAN,
- (20) DMITRIY KUSTOV,
- (21) MICHAEL INMAN,
- (22) ARAXIA NAZARYIAN,
- (23) ALEXANDER SOLIMAN,
- (24) CHERYL BARNDT,
- (25) ERIC FIGUEROA,
- (26) MARC ASHEGHIAN,
- (27) MICHAEL ASHEGHIAN,
- (28) DAVID MILLER,
- (29) JAMES RUSSO,
- (30) JEANNETTE COUCH,
- (31) MARIE POLICHETTI,

1 (32) BERNARDO GUILLEN, and

2 (33) JAVIER RAMIREZ,

3 and others known and unknown, unlawfully and knowingly, would and did execute a scheme and
4 artifice to defraud a financial institution and to obtain the moneys, funds, credits, assets, securities and
5 other property owned by, and under the custody and control of, a financial institution, by means of false
6 and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code,
7 Section 1344.

8 All in violation of Title 18, United States Code, Section 1349.

9 COUNT FIVE: (18 U.S.C. § 1956(h) – Money Laundering Conspiracy)

10 51. Paragraphs 1 through 31 of this Indictment are realleged, repeated, and incorporated by
11 reference as though fully set forth herein.

12 52. From at least in or about 2009, up through and including on or about May 6, 2015, in the
13 Northern District of California and elsewhere, the defendants,

14 (1) ARA KARAPEDYAN,

15 (2) MIHRAN STEPANYAN,

16 (3) ARTUR STEPANYAN,

17 (4) GEVORK TER-MKRTCHYAN,

18 (5) KHACHIG GEUYDIJIAN,

19 (6) ARMAN PETROYSAN,

20 (7) LANNA KARAPEDYAN,

21 (8) MAXWELL STARKY,

22 (9) SEVAK GHARGHANI,

23 (10) JEAN DUKMAJIAN,

24 (11) KARINE DUKMAJIAN,

25 (12) ANGELA DUKMAJIAN,

26 (13) ARMAN DANIELIAN,

27 (14) ASATOUR MAGZANYAN,

28 (15) TIGRAN SARKISYAN,

- 1 (16) HRIPSIME KHACHTRYAN,
- 2 (17) LOUI ARTIN,
- 3 (18) HUGO MARQUEZ,
- 4 (19) ARMAN ZARGARYAN,
- 5 (20) DMITRIY KUSTOV,
- 6 (21) ARAXIA NAZARYIAN,
- 7 (22) ALEXANDER SOLIMAN,
- 8 (23) CHERYL BARNDT,
- 9 (24) MARC ASHEGHIAN,
- 10 (25) MICHAEL ASHEGHIAN,
- 11 (26) DAVID MILLER,
- 12 (27) JAMES RUSSO,
- 13 (28) JEANNETTE COUCH, and
- 14 (29) MARIE POLICHETTI,

15 and others known and unknown, unlawfully and knowingly combined, conspired, confederated, and
16 agreed together and with each other to violate Title 18, United States Code, Section 1956(a)(1).

17 53. It was a part and an object of the conspiracy that the defendants,

- 18 (1) ARA KARAPEDYAN,
- 19 (2) MIHRAN STEPANYAN,
- 20 (3) ARTUR STEPANYAN,
- 21 (4) GEVORK TER-MKRTCHYAN,
- 22 (5) KHACHIG GEUYDIJIAN,
- 23 (6) ARMAN PETROYSAN,
- 24 (7) LANNA KARAPEDYAN,
- 25 (8) MAXWELL STARKY,
- 26 (9) SEVAK GHARGHANI,
- 27 (10) JEAN DUKMAJIAN,
- 28 (11) KARINE DUKMAJIAN,

- 1 (12) ANGELA DUKMAJIAN,
- 2 (13) ARMAN DANIELIAN,
- 3 (14) ASATOUR MAGZANYAN,
- 4 (15) TIGRAN SARKISYAN,
- 5 (16) HRIPSIME KHACHTRYAN,
- 6 (17) LOUI ARTIN,
- 7 (18) HUGO MARQUEZ,
- 8 (19) ARMAN ZARGARYAN,
- 9 (20) DMITRIY KUSTOV,
- 10 (21) ARAXIA NAZARYIAN,
- 11 (22) ALEXANDER SOLIMAN,
- 12 (23) CHERYL BARNDT,
- 13 (24) MARC ASHEGHIAN,
- 14 (25) MICHAEL ASHEGHIAN,
- 15 (26) DAVID MILLER,
- 16 (27) JAMES RUSSO,
- 17 (28) JEANNETTE COUCH, and
- 18 (29) MARIE POLICHETTI,

19 and others known and unknown, with the intent to promote the carrying on of specified unlawful activity
20 and to conceal and disguise the nature, location, source, ownership, and control of the proceeds of
21 specified unlawful activity, to wit, conspiracy to commit identity theft, in violation of Title 18, United
22 States Code, Section 1028(f), conspiracy to commit access device fraud, in violation of Title 18, United
23 States Code, Section 1029(b)(2), and conspiracy to commit mail, wire, and bank fraud, in violation of
24 Title 18, United States Code, Section 1349, unlawfully and knowingly, and knowing that property
25 involved in a financial transaction represents the proceeds of some form of unlawful activity, would and
26 did conduct and attempt to conduct a financial transaction which in fact involved the proceeds of
27 specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1).

28 All in violation of Title 18, United States Code, Section 1956(h).

1 COUNT SIX: (18 U.S.C. § 1958 –Conspiracy to Use Interstate Facility to Commit Murder-for-Hire)

2 54. Paragraphs 1 through 31 of this Indictment are realleged, repeated, and incorporated by
3 reference as though fully set forth herein.

4 55. From at least in or about August 2014, through and including in or about November
5 2014, in the Northern District of California and elsewhere, the defendants,

6 ARA KARAPEDYAN and
7 GEVORK TER-MKRTCHYAN,

8 and others known and unknown, unlawfully and knowingly combined, conspired, confederated, and
9 agreed together and with each other to violate Title 18, United States Code, Section 1958.

10 56. It was a part and an object of the conspiracy that the defendants,

11 ARA KARAPEDYAN and
12 GEVORK TER-MKRTCHYAN,

13 and others known and unknown, would and did cause another to travel in interstate and foreign
14 commerce, and use and cause another to use the mail and any facility of interstate and foreign
15 commerce, with intent that a murder be committed in violation of the laws of a State and the United
16 States as consideration for the receipt of, or as consideration for a promise and agreement to pay,
17 anything of pecuniary value, in violation of Title 18, United States Code, Section 1958.

18 All in violation of Title 18, United States Code, Section 1958.

19 COUNT SEVEN: (18 U.S.C. § 371 – Conspiracy to Engage in the Unlicensed Wholesale Distribution
20 of Drugs)

21 57. Paragraphs 1 through 31 of this Indictment are realleged, repeated, and incorporated by
22 reference as though fully set forth herein.

23 58. From at least in or about 2009, up through and including on or about May 6, 2015, in the
24 Northern District of California and elsewhere, the defendants,

25 (1) ARA KARAPEDYAN,
26 (2) MIHRAN STEPANYAN,
27 (3) ARTUR STEPANYAN,
28 (4) GEVORK TER-MKRTCHYAN,

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- (5) MAXWELL STARSKY,
- (6) SEVAK GHARGHANI,
- (7) ARMAN DANIELIAN,
- (8) HUGO MARQUEZ,
- (9) ARMAN ZARGARYAN,
- (10) ARAXIA NAZARYIAN,
- (11) ALEXANDER SOLIMAN,
- (12) CHERYL BARNDT,
- (13) ERIC FIGUEROA,
- (14) MARC ASHEGHIAN,
- (15) MICHAEL ASHEGHIAN,
- (16) DAVID MILLER,
- (17) JAMES RUSSO,
- (18) JEANNETTE COUCH,
- (19) MARIE POLICHETTI,
- (20) BERNARDO GUILLEN, and
- (21) JAVIER RAMIREZ,

and others known and unknown, unlawfully and knowingly combined, conspired, confederated, and agreed together and with each another to commit an offense against the United States, to wit, to violate Title 21, United States Code, Sections 331(t), 353(e)(2)(A), and 333(b)(1)(D).

59. It was a part and an object of the conspiracy that the defendants,

- (1) ARA KARAPEDYAN,
- (2) MIHRAN STEPANYAN,
- (3) ARTUR STEPANYAN,
- (4) GEVORK TER-MKRTCHYAN,
- (5) MAXWELL STARSKY,
- (6) SEVAK GHARGHANI,
- (7) ARMAN DANIELIAN,

- 1 (8) HUGO MARQUEZ,
- 2 (9) ARMAN ZARGARYAN,
- 3 (10) ARAXIA NAZARYIAN,
- 4 (11) ALEXANDER SOLIMAN,
- 5 (12) CHERYL BARNDT,
- 6 (13) ERIC FIGUEROA,
- 7 (14) MARC ASHEGHIAN,
- 8 (15) MICHAEL ASHEGHIAN,
- 9 (16) DAVID MILLER,
- 10 (17) JAMES RUSSO,
- 11 (18) JEANNETTE COUCH,
- 12 (19) MARIE POLICHETTI,
- 13 (20) BERNARDO GUILLEN, and
- 14 (21) JAVIER RAMIREZ,

15 and others known and unknown, unlawfully and knowingly would and did engage in the unlicensed
16 wholesale distribution of drugs in interstate commerce, in violation of Title 21, United States Code,
17 Sections 331(t), 353(e)(2)(A), and 333(b)(1)(D).

18 Overt Acts

19 60. In furtherance of the conspiracy, and to effect the illegal object thereof, the following
20 overt acts, among others, were committed in the Northern District of California:

21 a. In or about March 2011, a co-conspirator not named as a defendant herein
22 established a post office box address in the Northern District of California.

23 b. In or about August 2013, DAVID MILLER spoke over the telephone with an
24 employee of an Internet Service Provider located in the Northern District of California.

25 c. On or about August 16, 2013, ARA KARAPEDYAN picked up cash in the
26 Northern District of California.

27 d. On or about September 6, 2013, ARA KARAPEDYAN picked up cash in the
28 Northern District of California.

1 e. On or about September 26, 2013, ARA KARAPEDYAN picked up cash in the
2 Northern District of California.

3 f. On or about October 22, 2013, ARA KARAPEDYAN picked up cash in the
4 Northern District of California.

5 g. On or about November 12, 2013, ARA KARAPEDYAN picked up cash in the
6 Northern District of California.

7 h. On or about December 31, 2013, ARA KARAPEDYAN picked up cash in the
8 Northern District of California.

9 i. On or about November 9, 2014, MAXWELL STARKY sent an e-mail to a
10 recipient in the Northern District of California.

11 j. On or about January 8, 2015, SEVAK GHARGHANI delivered drugs to the
12 Northern District of California.

13 All in violation of Title 18, United States Code, Section 371.

14 COUNTS EIGHT THROUGH TWENTY-ONE: (18 U.S.C. §§ 510 & 2 – Forging Endorsements on
15 Treasury Checks)

16 61. On or about February 22, 2013, in the Northern District of California and elsewhere, the
17 defendants,

18 (1) ARA KARAPEDYAN,

19 (2) GEVORK TER-MKRTCHYAN,

20 (3) KHACHIG GEUYDIJIAN,

21 (4) ARMAN PETROYSAN,

22 (5) LANNA KARAPEDYAN,

23 (6) SEVAK GHARGHANI,

24 (7) JEAN DUKMAJIAN,

25 (8) KARINE DUKMAJIAN,

26 (9) ANGELA DUKMAJIAN, and

27 (10) ASATOUR MAGZANYAN,

28 and others known and unknown, unlawfully and knowingly, and with the intent to defraud, falsely made

1 and forged an endorsement on a Treasury check of the United States, and passed, uttered, and published,
 2 and attempted to pass, utter, and publish, a Treasury check of the United States bearing a falsely made
 3 and forged endorsement and signature, and, with knowledge that a Treasury check of the United States
 4 was stolen and bore a falsely made and forged endorsement and signature, received, delivered, and
 5 retained such a Treasury check of the United States, as described in the following table:

Count	Check Number	Check Date	Check Amount
8	3158-39263529	9/14/2012	\$2,110.00
9	3158-39315829	9/19/2012	\$4,831.00
10	3158-39315830	9/19/2012	\$5,388.00
11	3158-39451127	9/21/2012	\$4,208.00
12	3158-39848189	10/5/2012	\$8,526.00
13	3158-40309275	10/19/2012	\$406.71
14	3158-40309277	10/19/2012	\$4,604.00
15	3158-40309289	10/19/2012	\$6,134.00
16	3158-40309288	10/19/2012	\$7,885.00
17	3158-40697373	10/26/2012	\$5,705.00
18	3158-40697336	10/26/2012	\$7,494.00
19	3158-40697352	10/26/2012	\$7,553.00
20	3158-42678426	1/30/2013	\$16,521.51
21	3158-42678384	1/30/2013	\$22,644.00

22 All in violation of Title 18, United States Code, Sections 510 and 2.

23 **FORFEITURE ALLEGATIONS:** (18 U.S.C. § 1963; 18 U.S.C. §§ 982(a)(1)(A), 981(a)(1)(C),

24 982(a)(2)(B), 982(a)(7), 1028(b), 1029(c); 21 U.S.C. §§ 853(a)(1) & (2); and 28 U.S.C. § 2461(c))

25 62. Count One of this Indictment is realleged, repeated, and incorporated by reference as
 26 though fully set forth herein for the purpose of alleging forfeiture pursuant to the provisions of Title 18,
 27 United States Code, Section 1963.

28 63. Upon conviction of the offense alleged in Count One, the defendants,

- 1 (1) ARA KARAPEDYAN,
- 2 (2) MIHRAN STEPANYAN,
- 3 (3) ARTUR STEPANYAN,
- 4 (4) GEVORK TER-MKRTCHYAN,
- 5 (5) KHACHIG GEUYDIJIAN,
- 6 (6) ARMAN PETROYSAN,
- 7 (7) LANNA ARAPEDYAN,
- 8 (8) MAXWELL STARKY,
- 9 (9) SEVAK GHARGHANI,
- 10 (10) JEAN DUKMAJIAN,
- 11 (11) KARINE DUKMAJIAN,
- 12 (12) ANGELA DUKMAJIAN,
- 13 (13) ARMAN DANIELIAN,
- 14 (14) ASATOUR MAGZANYAN,
- 15 (15) TIGRAN SARKISYAN,
- 16 (16) HRIPSIME KHACHTRYAN,
- 17 (17) LOUI ARTIN,
- 18 (18) HUGO MARQUEZ,
- 19 (19) ARMAN ZARGARYAN,
- 20 (20) DMITRIY KUSTOV, and
- 21 (21) DAVID MILLER

22 shall, pursuant to Title 18, United States Code, Section 1963, forfeit to the United States of America:

- 23 a. Any interest acquired and maintained in violation of section 1962;
- 24 b. Any interest in, security of, claim against, and property and contractual right of
- 25 any kind affording a source of influence over, any enterprise which the defendants established, operated,
- 26 controlled, conducted, and participated in the conduct of, in violation of section 1962; and
- 27 c. Any property constituting, and derived from, any proceeds obtained, directly and
- 28 indirectly, from racketeering activity and unlawful debt collection in violation of 1962.

1 64. Counts Two, Three, Five, and Eight through Twenty-One of this Indictment are
2 realleged, repeated, and incorporated by reference as though fully set forth herein for the purpose of
3 alleging forfeiture pursuant to the provisions of Title 18, United States Code, Sections 492,
4 982(a)(2)(B), 1028(b), and 1029(c)(1)(C).

5 65. Upon conviction of any of the offenses alleged in Counts Two, Three, Five, and Eight
6 through Twenty-One of this Indictment, defendants,

- 7 (1) ARA KARAPEDYAN,
- 8 (2) MIHRAN STEPANYAN,
- 9 (3) ARTUR STEPANYAN,
- 10 (4) GEVORK TER-MKRTCHYAN,
- 11 (5) KHACHIG GEUYDIJIAN,
- 12 (6) ARMAN PETROYSAN,
- 13 (7) LANNA KARAPEDYAN,
- 14 (8) MAXWELL STARKY,
- 15 (9) SEVAK GHARGHANI,
- 16 (10) JEAN DUKMAJIAN,
- 17 (11) KARINE DUKMAJIAN,
- 18 (12) ANGELA DUKMAJIAN,
- 19 (13) ARMAN DANIELIAN,
- 20 (14) ASATOUR MAGZANYAN,
- 21 (15) TIGRAN SARKISYAN,
- 22 (16) HRIPSIME KHACHTRYAN,
- 23 (17) LOUI ARTIN,
- 24 (18) HUGO MARQUEZ,
- 25 (19) ARMAN ZARGARYAN,
- 26 (20) DMITRIY KUSTOV, and
- 27 (21) DAVID MILLER,

28 shall forfeit to the United States all property constituting and derived from or traceable to any proceeds

1 the defendant obtained, directly or indirectly, as a result of said violations, any conveyance, including
2 any vessel, vehicle, or aircraft used in the commission of the offense of which the person is convicted,
3 any forged coins or obligations or other securities of the United States, and any property, real or
4 personal, that is used to facilitate, or is intended to be used to facilitate, the commission of the offenses.

5 66. Counts Four and Six of this Indictment are realleged, repeated, and incorporated by
6 reference as though fully set forth herein for the purpose of alleging forfeiture pursuant to the provisions
7 of Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

8 67. Upon conviction of any of the offenses alleged in Counts Four and Six of this Indictment,
9 the defendants,

- 10 (1) ARA KARAPEDYAN,
- 11 (2) MIHRAN STEPANYAN,
- 12 (3) ARTUR STEPANYAN,
- 13 (4) GEVORK TER-MKRTCHYAN,
- 14 (5) KHACHIG GEUYDIJIAN,
- 15 (6) ARMAN PETROYSAN,
- 16 (7) LANNA KARAPEDYAN,
- 17 (8) MAXWELL STARKY,
- 18 (9) SEVAK GHARGHANI,
- 19 (10) JEAN DUKMAJIAN,
- 20 (11) KARINE DUKMAJIAN,
- 21 (12) ANGELA DUKMAJIAN,
- 22 (13) ARMAN DANIELIAN,
- 23 (14) ASATOUR MAGZANYAN,
- 24 (15) TIGRAN SARKISYAN,
- 25 (16) HRIPSIME KHACHTRYAN,
- 26 (17) LOUI ARTIN,
- 27 (18) HUGO MARQUEZ,
- 28 (19) ARMAN ZARGARYAN,

1 (20) DMITRIY KUSTOV,

2 (21) MICHAEL INMAN,

3 (22) ARAXIA NAZARYIAN,

4 (23) ALEXANDER SOLIMAN,

5 (24) CHERYL BARNDT,

6 (25) ERIC FIGUEROA,

7 (26) MARC ASHEGHIAN,

8 (27) MICHAEL ASHEGHIAN,

9 (28) DAVID MILLER,

10 (29) JAMES RUSSO,

11 (30) JEANNETTE COUCH,

12 (31) MARIE POLICHETTI,

13 (32) BERNARDO GUILLEN, and

14 (33) JAVIER RAMIREZ,

15 shall, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), forfeit to the United States any
16 property, real or personal, which constitutes or is derived from proceeds traceable to said offense, or a
17 conspiracy to commit said offense, including but not limited to:

18 a. approximately \$3,017,888.30 seized from Bank of Manhattan account number
19 208948807, held in the name of Sky Atlantic Capital Group, Inc. on or about 24-Feb-15;

20 b. approximately \$7,983,151.78 seized from Bank of Manhattan account number
21 285126789 held in the name of Sky Atlantic Capital Group, Inc. on or about 24-Feb-15;

22 c. approximately \$1,926,579.42 seized from Associated Bank account number
23 2283283550 held in the name of Minnesota Independent Cooperative, Inc. on or about 25-Feb-15;

24 d. approximately \$340,645.48 seized from Merchant Bank account number
25 70050342 held in the name of Minnesota Independent Cooperative, Inc. on or about 27-Feb-15;

26 e. approximately \$716,539.66 seized from Citibank account number 205851595
27 held in the name of Nationwide Payment Solutions, Inc. on or about 12-Mar-15;

28 f. approximately \$2,362.80 seized from Citibank account number 205851587 held

1 in the name of Nationwide Payment Solutions, Inc. on or about 12-Mar-15;

2 g. approximately \$1,910.00 seized from Citibank account number 205851280 held
3 in the name of Westprime Systems Inc. on or about 12-Mar-15;

4 h. approximately \$8,839.18 seized from Citibank account number 205851298 held
5 in the name of Westprime Systems Inc. on or about 12-Mar-15;

6 i. approximately \$4,934,463.32 held to settle the un-negotiated cashier's check
7 number 254492 made payable to Sky Atlantic Capital Group, Inc., and originally funded by Comerica
8 Bank account number 1894966892, held in the name of Sky Atlantic seized on or about 4-Mar-15;

9 j. approximately \$1,241,680.82 from Comerica Bank held to settle the un-
10 negotiated cashier's check number 254491 made payable to Sky Atlantic Capital Group, Inc., and
11 originally funded by Comerica Bank account number 1894966884, held in the name of Sky Atlantic
12 seized on or about 4-Mar-15;

13 k. approximately \$451,741.61 seized from Banco Santander account no.
14 3004892983, held in the name of FMC Distributors, Inc. on or about 5-Mar-15;

15 l. Real Property and Improvements located at 1634 La Lorna Drive, Santa Ana,
16 California 92705 (APN 502-011-038);

17 m. Real Property and Improvements located at 213 34th Street, Newport Beach,
18 California 92663 (APN 423-351-18); and

19 n. Real Property and Improvements located at 1422 Edinger Avenue, Suite 230,
20 Tustin, California 92780 (APN 939-651-30, alternate APN 430-261-32).

21 68. Count Five of this Indictment is realleged, repeated, and incorporated by reference as
22 though fully set forth herein for the purpose of alleging forfeiture pursuant to the provisions of Title 18,
23 United States Code, Section 982(a)(1).

24 69. Upon conviction of the offense alleged in Count Five of this Indictment, the defendants,

25 (1) ARA KARAPEDYAN,

26 (2) MIHRAN STEPANYAN,

27 (3) ARTUR STEPANYAN,

28 (4) GEVORK TER-MKRTCHYAN,

- 1 (5) KHACHIG GEUYDIJIAN,
- 2 (6) ARMAN PETROYSAN,
- 3 (7) LANNA KARAPEDYAN,
- 4 (8) MAXWELL STARSKY,
- 5 (9) SEVAK GHARGHANI,
- 6 (10) JEAN DUKMAJIAN,
- 7 (11) KARINE DUKMAJIAN,
- 8 (12) ANGELA DUKMAJIAN,
- 9 (13) ARMAN DANIELIAN,
- 10 (14) ASATOUR MAGZANYAN,
- 11 (15) TIGRAN SARKISYAN,
- 12 (16) HRIPSIME KHACHTRYAN,
- 13 (17) LOUI ARTIN,
- 14 (18) HUGO MARQUEZ,
- 15 (19) ARMAN ZARGARYAN,
- 16 (20) DMITRIY KUSTOV,
- 17 (21) ARAXIA NAZARYIAN,
- 18 (22) ALEXANDER SOLIMAN,
- 19 (23) CHERYL BARNDT,
- 20 (24) MARC ASHEGHIAN,
- 21 (25) MICHAEL ASHEGHIAN,
- 22 (26) DAVID MILLER,
- 23 (27) JAMES RUSSO,
- 24 (28) JEANNETTE COUCH, and
- 25 (29) MARIE POLICHETTI,

26 shall, pursuant to 18 U.S.C. § 982(a)(1), forfeit to the United States any property, real and personal,
27 involved in said violations, and any property traceable to such property including, but not limited to the
28 following:

- 1 a. approximately \$3,017,888.30 seized from Bank of Manhattan account number
- 2 208948807, held in the name of Sky Atlantic Capital Group, Inc. on or about 24-Feb-15;
- 3 b. approximately \$7,983,151.78 seized from Bank of Manhattan account number
- 4 285126789 held in the name of Sky Atlantic Capital Group, Inc. on or about 24-Feb-15;
- 5 c. approximately \$1,926,579.42 seized from Associated Bank account number
- 6 2283283550 held in the name of Minnesota Independent Cooperative, Inc. on or about 25-Feb-15;
- 7 d. approximately \$340,645.48 seized from Merchant Bank account number
- 8 70050342 held in the name of Minnesota Independent Cooperative, Inc. on or about 27-Feb-15;
- 9 e. approximately \$716,539.66 seized from Citibank account number 205851595
- 10 held in the name of Nationwide Payment Solutions, Inc. on or about 12-Mar-15;
- 11 f. approximately \$2,362.80 seized from Citibank account number 205851587 held
- 12 in the name of Nationwide Payment Solutions, Inc. on or about 12-Mar-15;
- 13 g. approximately \$1,910.00 seized from Citibank account number 205851280 held
- 14 in the name of Westprime Systems Inc. on or about 12-Mar-15;
- 15 h. approximately \$8,839.18 seized from Citibank account number 205851298 held
- 16 in the name of Westprime Systems Inc. on or about 12-Mar-15;
- 17 i. approximately \$4,934,463.32 held to settle the un-negotiated cashier's check
- 18 number 254492 made payable to Sky Atlantic Capital Group, Inc., and originally funded by Comerica
- 19 Bank account number 1894966892, held in the name of Sky Atlantic seized on or about 4-Mar-15;
- 20 j. approximately \$1,241,680.82 from Comerica Bank held to settle the un-
- 21 negotiated cashier's check number 254491 made payable to Sky Atlantic Capital Group, Inc., and
- 22 originally funded by Comerica Bank account number 1894966884, held in the name of Sky Atlantic
- 23 seized on or about 4-Mar-15;
- 24 k. approximately \$451,741.61 seized from Banco Santander account no.
- 25 3004892983, held in the name of FMC Distributors, Inc. on or about 5-Mar-15;
- 26 l. Real Property and Improvements located at 1634 La Lorna Drive, Santa Ana,
- 27 California 92705 (APN 502-011-038);
- 28 m. Real Property and Improvements located at 213 34th Street, Newport Beach,

1 California 92663 (APN 423-351-18); and

2 n. Real Property and Improvements located at 1422 Edinger Avenue, Suite 230,
3 Tustin, California 92780 (APN 939-651-30, alternate APN 430-261-32).

4 70. Count Seven of this Indictment is realleged, repeated, and incorporated by reference as
5 though fully set forth herein for the purpose of alleging forfeiture pursuant to the provisions of Title 18,
6 United States Code, Section 982(a)(7) and Title 21, United States Code, Section 853.

7 71. Upon conviction of the offense alleged in Count Seven of this Indictment, the defendants,

8 (1) ARA KARAPEDYAN,

9 (2) MIHRAN STEPANYAN,

10 (3) ARTUR STEPANYAN,

11 (4) GEVORK TER-MKRTCHYAN,

12 (5) MAXWELL STARKY,

13 (6) SEVAK GHARGHANI,

14 (7) ARMAN DANIELIAN,

15 (8) HUGO MARQUEZ,

16 (9) ARMAN ZARGARYAN,

17 (10) ARAXIA NAZARYIAN,

18 (11) ALEXANDER SOLIMAN,

19 (12) CHERYL BARNDT,

20 (13) ERIC FIGUEROA,

21 (14) MARC ASHEGHIAN,

22 (15) MICHAEL ASHEGHIAN,

23 (16) DAVID MILLER,

24 (17) JAMES RUSSO,

25 (18) JEANNETTE COUCH,

26 (19) MARIE POLICHETTI,

27 (20) BERNARDO GUILLEN, and

28 (21) JAVIER RAMIREZ,

1 shall, pursuant to 21 U.S.C. § 853(a)(1) and (2), forfeit to the United States all right, title, and interest in
2 property constituting and derived from any proceeds defendants obtained, directly or indirectly, as a
3 result of said violations, and any property used, or intended to be used, in any manner or part, to commit,
4 or to facilitate the commission of the said violations, or any property traceable to such property,
5 including but not limited to:

6 a. approximately \$3,017,888.30 seized from Bank of Manhattan account number
7 208948807, held in the name of Sky Atlantic Capital Group, Inc. on or about 24-Feb-15;

8 b. approximately \$7,983,151.78 seized from Bank of Manhattan account number
9 285126789 held in the name of Sky Atlantic Capital Group, Inc. on or about 24-Feb-15;

10 c. approximately \$1,926,579.42 seized from Associated Bank account number
11 2283283550 held in the name of Minnesota Independent Cooperative, Inc. on or about 25-Feb-15;

12 d. approximately \$340,645.48 seized from Merchant Bank account number
13 70050342 held in the name of Minnesota Independent Cooperative, Inc. on or about 27-Feb-15;

14 e. approximately \$716,539.66 seized from Citibank account number 205851595
15 held in the name of Nationwide Payment Solutions, Inc. on or about 12-Mar-15;

16 f. approximately \$2,362.80 seized from Citibank account number 205851587 held
17 in the name of Nationwide Payment Solutions, Inc. on or about 12-Mar-15;

18 g. approximately \$1,910.00 seized from Citibank account number 205851280 held
19 in the name of Westprime Systems Inc. on or about 12-Mar-15;

20 h. approximately \$8,839.18 seized from Citibank account number 205851298 held
21 in the name of Westprime Systems Inc. on or about 12-Mar-15;

22 i. approximately \$4,934,463.32 held to settle the un-negotiated cashier's check
23 number 254492 made payable to Sky Atlantic Capital Group, Inc., and originally funded by Comerica
24 Bank account number 1894966892, held in the name of Sky Atlantic seized on or about 4-Mar-15;

25 j. approximately \$1,241,680.82 from Comerica Bank held to settle the un-
26 negotiated cashier's check number 254491 made payable to Sky Atlantic Capital Group, Inc., and
27 originally funded by Comerica Bank account number 1894966884, held in the name of Sky Atlantic
28 seized on or about 4-Mar-15;

1 k. approximately \$451,741.61 seized from Banco Santander account no.
2 3004892983, held in the name of FMC Distributors, Inc. on or about 5-Mar-15;

3 l. Real Property and Improvements located at 1634 La Lorna Drive, Santa Ana,
4 California 92705 (APN 502-011-038);

5 m. Real Property and Improvements located at 213 34th Street, Newport Beach,
6 California 92663 (APN 423-351-18); and

7 n. Real Property and Improvements located at 1422 Edinger Avenue, Suite 230,
8 Tustin, California 92780 (APN 939-651-30, alternate APN 430-261-32).

9 All in violation of Title 18, United States Code, Sections 492, 981(a)(1)(A), 981(a)(1)(C),
10 982(a)(1), 982(a)(2)(B), 982(a)(7), and 1963; Title 21, United States Code, Section 853; Title 28, United
11 States Code, Section 2461(c), and Rule 32.2 of the Federal Rules of Criminal Procedure.

12 DATED:


A TRUE BILL.

13 7/7/15

14 
15 _____
FOREPERSON

16 MELINDA HAAG
United States Attorney

17 
18 DAVID R. CALLAWAY
19 Chief, Criminal Division

20
21 (Approved as to form: 
22 W.S. WILSON LEUNG
23 DAMALI A. TAYLOR
24 DAVID B. COUNTRYMAN
Assistant United States Attorneys