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17 UNITED STATES OF AMERICA

18 UNITED STATES DISTRICT COURT

19 FOR THE CENTRAL DISTRICT OF CALIFORNIA

20 UNITED STATES OF AMERICA,

21 Plaintiff,

22 v.

23 ARMAN HAYRAPETYAN,

24 Defendant.

No. CR 20-00579(A)-SVW-6

GOVERNMENT'S SENTENCING POSITION FOR
DEFENDANT ARMAN HAYRAPETYAN; PROOF
OF SERVICE

Date: September 20, 2021

Time: 11:00 a.m.

Location: Courtroom of the Hon.
Stephen V. Wilson

26 Plaintiff United States of America, by and through its counsel
27 of record, the Acting United States Attorney for the Central District
28 of California, Assistant United States Attorneys Scott Paetty,

1 Catherine Ahn, and Brian Faerstein, and Department of Justice Trial
2 Attorney Christopher Fenton, hereby files its sentencing position
3 regarding defendant Arman Hayrapetyan.

4 The government's sentencing position is based upon the attached
5 memorandum of points and authorities, the presentence investigation
6 report, the files and records in this case, and any other evidence or
7 argument that the Court may wish to consider at the time of
8 sentencing.

9 The government reserves the right to file any supplemental
10 sentencing position(s) that may be necessary.¹

11 Dated: September 13, 2021

Respectfully submitted,

12 TRACY L. WILKISON
Acting United States Attorney

13 SCOTT M. GARRINGER
14 Assistant United States Attorney
Chief, Criminal Division

15 _____
/s/
16 SCOTT PAETTY
17 CATHERINE AHN
18 BRIAN FAERSTEIN
Assistant United States Attorneys
CHRISTOPHER FENTON
Department of Justice Trial Attorney

19 Attorneys for Plaintiff
20 UNITED STATES OF AMERICA
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26 _____
27 ¹ The government notes that on September 13, 2021, defendant
28 Hayrapetyan's counsel filed an unopposed motion to continue
sentencing from September 20 to October 11, 2021. (ECF 960). As of
the time of this filing, that motion has yet to be decided.

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MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

The government respectfully submits this sentencing position to advise the Court of its sentencing recommendation regarding defendant Arman Hayrapetyan ("defendant"), who has pleaded guilty to conspiracy to commit money laundering. The government agrees with the United States Probation and Pretrial Services Office's (the "USPO") recommendation of a 10-month term of custody, representing the low end of the advisory Guidelines range. However, defendant should serve the full term in prison and not the split sentence (5 months' prison, 5 months' home confinement) recommended by the USPO. The government also agrees with the USPO's recommendation of two years of supervised release, but recommends additional conditions reasonably related to defendant's underlying offense conduct. The government does not take a position on defendant's ability to pay a fine, which the USPO recommends waiving, but concurs with the USPO's findings that no identifiable restitution is owed by defendant at this time under the circumstances of this case and that defendant must pay the mandatory \$100 special assessment.

II. RELEVANT PROCEDURAL HISTORY

On March 11, 2021, a grand jury returned a first superseding indictment against defendant and seven codefendants, charging defendant with conspiracy to commit wire fraud and bank fraud, multiple counts of wire fraud and bank fraud, aggravated identity theft, and conspiracy to commit money laundering. (ECF 154.) On May 28, 2021, defendant initially entered a plea agreement with the government, agreeing to plead guilty to money laundering conspiracy, in violation of 18 U.S.C. § 1956(h). (ECF 377.) However, during a

1 change of plea hearing on June 4, 2021, the Court did not accept
2 defendant's guilty plea. (ECF 448.) On June 21, 2021, while four
3 codefendants were in the midst of trial in this proceeding, defendant
4 entered a guilty plea pursuant to a subsequent plea agreement to the
5 same count of money laundering conspiracy (Count 26), which the Court
6 accepted. (ECF 567.)

7 On August 13, 2021, the USPO filed a Presentence Investigation
8 Report (the "PSR") in which it calculated a total offense level of 12
9 and a Criminal History Category I, resulting in an advisory
10 Guidelines range of 10 to 16 months' imprisonment. (ECF 869.) The
11 USPO recommends that defendant be sentenced to a split term of five
12 months in prison and five months of home detention as a condition of
13 supervised release, two years of supervised release, no fine or
14 restitution, and a \$100 mandatory special assessment. (ECF 868.)

15 The government agrees with the USPO's offense level and criminal
16 history calculations as well as its recommendation of an overall 10-
17 month custodial sentence at the low-end of the advisory Guidelines
18 range, consistent with the parties' plea agreement.¹ However, for
19 the reasons described below, the government disagrees with the USPO's
20 recommended split sentence, and instead believes a 10-month term of
21 imprisonment is appropriate in this case. The government also
22 addresses the other components of defendant's sentence below.

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24
25
26 ¹ At the time of the USPO's filing of its initial PSR, the
27 government informed the USPO by email, copying defense counsel, that
28 it did not have any substantive objections to the PSR other than
certain corrections as to dates and other information not impacting
the advisory Guidelines calculations in this case.

1 **III. DEFENDANT'S OFFENSE CONDUCT**

2 Defendant first met Manuk Grigoryan ("Grigoryan"), one of his
3 codefendants in this case, in late 2019 and began opening bank
4 accounts at Grigoryan's direction in the names of construction
5 companies. (PSR ¶¶ 31-32.) Among other things, in consultation with
6 Grigoryan, defendant opened business checking accounts at J.P. Morgan
7 Chase Bank in the names of "Arman Hayrapetyan DBA [S.] Construction"
8 and "Arman Hayrapetyan DBA [H.] Construction Co." in late 2019 and
9 early 2020, having never met the actual owners (D.S. and M.H.) of
10 these actual businesses. (Id. ¶¶ 32, 34.) These stolen business
11 entities - S. Construction and H. Construction - were later used by
12 defendant's co-conspirators (including Grigoryan) to cause the
13 submission of fraudulent Paycheck Protection Program ("PPP") and
14 Economic Injury Disaster Loan ("EIDL") program loan applications in
15 May 2020 and thereafter.² (Id. ¶¶ 37, 38.)

16 When defendant first opened these bank accounts, he purportedly
17 believed from discussions with Grigoryan that they would be partners
18 in a large construction company, and defendant's duties would
19 include, among other things, overseeing employees and depositing
20 checks into the construction company bank accounts. (Id. ¶ 31.)
21 However, defendant never supervised any employees, visited any
22 construction sites, or met the owners of S. Construction or H.

24 ² The loan applications fraudulently submitted on behalf of
25 these stolen company names shared certain hallmarks of the larger
26 underlying wire fraud and bank fraud conspiracy. For instance, one
27 of the loan applications submitted on behalf of the supposed company
28 S. Construction included a purported "Gusto" payroll report that was
virtually identical in substance as a fraudulent payroll report
submitted in support of a PPP loan application for Fadehaus
Barbershop, which defendant Grigoryan caused to be submitted. (See
PSR ¶ 38; ECF 436 (Grigoryan plea agreement) at 16.)

1 Construction. (Id. ¶¶ 34, 35.) Defendant's actual duties amounted
2 to little more than initially depositing checks into the accounts and
3 withdrawing large sums of money. (Id. ¶ 33.) Later, after the bank
4 accounts defendant had opened began receiving large wire transfers,
5 defendant principally made routine large cash withdrawals without
6 corresponding deposits. (Id. ¶¶ 33, 35.) In all cases, at
7 Grigoryan's direction, defendant would provide the large sums of cash
8 to an associate of Grigoryan's and take a 5% cut of the transactions
9 for himself. (Id. ¶¶ 33, 35.) Defendant soon came to realize that
10 the purported construction company partnership was a sham. (Id.
11 ¶ 34.) Despite this realization, defendant carried on with the
12 scheme. (Id. ¶ 36.)

13 By April 2020, defendant knew or was at least aware of a high
14 probability that the construction company bank accounts from which he
15 withdrew large sums of cash were being used to launder proceeds of
16 unlawful activity. (Id. ¶ 34.) As noted above, these accounts were
17 ultimately used to funnel the proceeds of fraudulent PPP and EIDL
18 loans starting in or around May 2020. (Id. ¶¶ 37, 38.) By the time
19 defendant made two \$10,000 cash withdrawals from the "Arman
20 Hayrapetyan DBA [S.] Construction" on May 19 and 20, 2020,
21 respectively, this money was directly traceable to a fraudulent
22 \$182,637 PPP loan in the name of S. Construction that defendant's co-
23 conspirators caused to be obtained from Webbank in May 2020. (Id.
24 ¶ 38.) Defendant agreed with Grigoryan that he would make this
25 aggregate withdrawal of \$20,000 in cash and provide it to Grigoryan's
26 associate. (Id. ¶ 39.) Defendant knew, or deliberately avoided
27 learning the truth despite all the red flags described above, that in
28

1 so doing, he was conducting financial transactions involving proceeds
2 of criminal activity in order to conceal or disguise the true nature
3 of those proceeds. (Id. ¶¶ 37-39.)

4 **IV. ADVISORY SENTENCING GUIDELINES CALCULATION**

5 Applying the November 1, 2018 Guidelines, and taking into
6 account relevant conduct that was reasonably foreseeable to
7 defendant, the USPO calculated defendant's total offense level as 12
8 based on the following calculations: base offense level of 12 under
9 U.S.S.G. §§ 2S1.1(a)(2), 2B1.1(b)(1)(C) (consisting of 8 plus 4
10 additional levels for laundered funds of more than \$15,000); a 2-
11 level enhancement under U.S.S.G. § 2S1.1(b)(2)(B) for defendant's
12 conviction for conspiracy under 18 U.S.C. § 1956(h) with 18 U.S.C.
13 § 1956(a)(1)(B)(i) as one of the objects of the conspiracy; and a 2-
14 level reduction for acceptance of responsibility under U.S.S.G.
15 § 3E1.1(a). (PSR ¶¶ 43-56.) In addition, the USPO determined that
16 defendant has zero criminal history points, resulting in a Criminal
17 History Category of I.³ (See id. ¶¶ 58-61.) With a total offense
18 level of 12 and a Criminal History Category I, defendant's advisory
19 Guidelines range is 10-16 months' imprisonment.

20 **V. SECTION 3553(a) FACTORS**

21 The Court should impose a sentence sufficient, but not greater
22 than necessary, to reflect the purposes of sentencing identified in
23 18 U.S.C. § 3553(a). United States v. Carty, 520 F.3d 984, 991 (9th
24 Cir. 2008). The advisory Guidelines range provides the "starting
25 point and . . . initial benchmark" for this Court's consideration of

26 ³ The government notes that defendant first arrived in the
27 United States in early 2019 and the government does not have any
28 information about defendant's prior criminal history, if any, before
moving to this country.

1 an appropriate sentence. Molina-Martinez v. United States, 136 S.Ct.
2 1338, 1345 (2016) (quoting Gall v. United States, 552 U.S. 38, 49
3 (2007)). Although the Guidelines are not binding, they “reflect a
4 rough approximation of sentences that might achieve section 3553(a)’s
5 objectives.” United States v. Rita, 551 U.S. 338, 350 (2007).

6 Under 18 U.S.C. § 3553(a), in arriving at the appropriate
7 sentence, the Court should consider, among other factors, the nature
8 and circumstances of the offense and the history and characteristics
9 of the defendant, § 3553(a)(1); the need for the sentence imposed to
10 reflect the seriousness of the offense, to promote respect for the
11 law, and to provide just punishment for the offense, § 3553(a)(2)(A);
12 the need for the sentence imposed to afford adequate deterrence to
13 criminal conduct, § 3553(a)(2)(B); the need for the sentence imposed
14 to protect the public from further crimes of the defendant,
15 § 3553(a)(2)(C); the kinds of sentences available, § 3553(a)(3); and
16 the need to avoid unwarranted sentence disparities, § 3553(a)(6).

17 **VI. GOVERNMENT’S SENTENCING RECOMMENDATION**

18 **A. Term of Custody**

19 In light of the relevant 18 U.S.C. § 3553(a) factors, a low-end
20 Guidelines sentence of 10 months in prison is sufficient, but not
21 greater than necessary, to achieve the goals of sentencing here.

22 1. Nature and Circumstances of the Offense and History 23 and Characteristics of the Defendant (18 U.S.C. § 3553(a)(1))

24 Defendant played an important role in enabling what, in the
25 grand scheme, was a massive conspiracy to launder the proceeds of
26 millions of dollars of fraudulently-obtained PPP and EIDL loans.
27 Defendant was complicit in this money laundering conspiracy, whether
28

1 or not he knew at the very outset in December 2019 that the bank
2 accounts he opened would be used to launder some of the proceeds of
3 fraud. Even in opening these bank accounts, defendant brazenly used
4 his own name (e.g., "Arman Hayrapetyan DBA S. Construction") when he
5 had never met the owners or employees of the purported construction
6 businesses nor seen any evidence of actual ongoing work. And
7 defendant very quickly learned there was nothing legitimate about the
8 purported construction company partnership he entered with Grigoryan
9 and Grigoryan's associate. He made the conscious decision to
10 continue playing an integral role in the conspiracy, however,
11 withdrawing large sums of cash for distribution to co-conspirators
12 even after the bank accounts became flush with money from
13 fraudulently-obtained PPP and EIDL loans.

14 Defendant had the knowledge and ability to understand the
15 seriousness of the illegal conduct in which he engaged. According to
16 defendant, he obtained the equivalent of a juris doctorate in Armenia
17 in 2017. (PSR ¶ 78.) Prior to that, defendant represented to the
18 USPO that he was an officer in the Armenian Army for fifteen years,
19 served in NATO forces, and grew up with a father in law enforcement.
20 (Id. ¶¶ 66, 82.) Despite this upbringing and training - and within
21 his first year of emigrating to and seeking asylum within the United
22 States - defendant chose to break the law. He conspired with those
23 he knew to be engaged in illegal financial transactions and furthered
24 their unlawful ends, motivated by a 5% cut of the money he helped
25 launder.

26 Defendant was not an unsophisticated new arrival swindled into
27 illegal conduct. He knew right from wrong, chose the unlawful path,
28

1 and continued down it for months, even as the full scope of the
2 laundering scheme in which he was engaged became apparent. A
3 Guidelines sentence of 10 months in prison is appropriate based on an
4 individualized assessment of this defendant and the circumstances of
5 his volitional involvement in conduct he knew to be wrong.

6 2. Seriousness of the Offense, Respect for the Law, and
7 Just Punishment (18 U.S.C. § 3553(a) (2) (A))

8 A custodial sentence within the advisory Guidelines range is
9 also needed in this case to reflect the seriousness of the offense,
10 promote respect for the law, and provide just punishment for the
11 offense. The money laundering conspiracy in which defendant
12 participated arose out of and sought to conceal the proceeds of a
13 vast conspiracy to steal COVID-19 disaster relief loan funds. Those
14 funds were earmarked for legitimate small businesses and their
15 employees that desperately needed them in 2020 to survive as the
16 COVID-19 pandemic paralyzed the economy. While a large swath of the
17 population was struggling to make ends meet, defendant was
18 withdrawing substantial sums of cash that ultimately derived, in some
19 or large part, from fraudulently obtained PPP and EIDL proceeds.

20 Although defendant may not have known the details of the
21 PPP/EIDL wire and bank fraud scheme, his direct and recurring
22 involvement in the corresponding money laundering conspiracy cannot
23 be divorced from the reality of the COVID-19 disaster relief loan
24 fraud that it serviced. Defendant's involvement in laundering those
25 funds, and conspiring with others to do so, reflects very serious
26 conduct necessitating just punishment in this case. As the COVID-19
27 pandemic continues and additional opportunities arise for the
28

1 criminal-minded to exploit this ongoing disaster, a significant
2 sentence is further needed to promote respect for the law during this
3 exceptional time. Nonetheless, defendant expressed a willingness to
4 accept responsibility relatively early in the course of his
5 involvement in this case. A low-end Guidelines sentence of 10 months
6 in prison here is sufficient but not greater than necessary to strike
7 the right balance of achieving the goals of sentencing in this case.

8 3. Affording Adequate Deterrence and Protecting the
9 Public from Further Crimes of the Defendant (18 U.S.C.
§ 3553(a)(2)(B) and (C))

10 The sentence here should also serve as an adequate deterrent not
11 only to defendant but also to those in society who may consider
12 engaging in similar conduct in the future. As the USPO recognizes,
13 the Sentencing Commission sought to ensure that for white-collar
14 crimes, "the definite prospect of prison, even though the term may be
15 short, will serve as a significant deterrent, particularly when
16 compared to pre-guidelines practice where probation, not prison, was
17 the norm." (ECF 868 (quoting U.S.S.G. § 1A1.4(d)).) Similar to the
18 need to promote respect for the law, a low-end Guidelines sentence in
19 a case such as this will signal to other potential wrongdoers that
20 there are significant consequences for exploiting a national
21 emergency such as that brought on by the COVID-19 pandemic.

22 While the Court is also required to consider the "kinds of
23 sentences available," 18 U.S.S.C. § 3553(a)(3), the government
24 disagrees with the USPO's recommendation of splitting the 10-month
25 custodial sentence between five months in prison and five months on
26 home detention. As previously explained, defendant's involvement in
27 the money laundering conspiracy helped enable the underlying PPP/EIDL
28

1 fraud conspiracy under exceptional circumstances for this country.
2 Defendant should have been especially attuned to the unlawfulness of
3 his conduct during an unprecedented time, given his self-reported
4 prior legal training and service in law enforcement in Armenia. A
5 split-sentence under these circumstances will undermine the overall
6 deterrent effect here - both as to defendant and society at large.

7 With these factors in mind, the government respectfully submits
8 that a low-end custodial sentence of 10 months in prison is
9 sufficient, but not greater than necessary, to achieve the goals of
10 sentencing in this case.

11 **B. Supervised Release**

12 The government concurs with the USPO's recommended term of two
13 years of supervised release following defendant's release from
14 prison, should he not be deported following his term of custody.⁴
15 The government recommends two additional special conditions of
16 supervised release in light of defendant's underlying financial
17 crimes and use of stolen individual and business names to open bank
18 accounts and engage in financial transactions. Specifically, the
19 government recommends that: (1) defendant shall be prohibited from
20 using any name other than his own legal name for any purpose,

21 ⁴ The Sentencing Guidelines advise that sentencing courts
22 ordinarily should not impose a term of supervised release for aliens
23 who are likely to be deported after a period of imprisonment. See
24 U.S.S.G. § 5D1.1(c). The commentary provides that "[t]he court
25 should, however, consider imposing a term of supervised release on
26 such a defendant if the court determines it would provide an added
27 measure of deterrence and protection based on the facts and
28 circumstances of a particular case." U.S.S.G. § 5D1.1, comment. n.5.
In this case, while the government understands defendant has been
granted asylum and may be deported following his federal term of
imprisonment, a two-year term of supervised release will provide an
added measure of deterrence and protection of the public based on
defendant's engaging in financial crimes only shortly after arriving
in the United States. See id.

1 including to open or access bank, brokerage or cryptocurrency
2 accounts; apply for loans or credit; and/or engage in any financial
3 transaction; and (2) defendant shall be prohibited from engaging in
4 any financial transaction in an amount of \$10,000 or greater unless
5 he obtains prior approval from the USPO. These conditions are
6 largely aimed at protecting the public from further financial and
7 identity theft crimes of defendant, which are reasonably related to
8 the sentencing factors described more fully above. U.S.S.G.
9 § 5D1.3(b).

10 **C. Fine, Restitution, and Mandatory Special Assessment**

11 The government takes no position on the imposition of a fine,
12 including the USPO's recommendation that the Court waive imposition
13 of a fine in this case. The government notes, however, that while
14 defendant reports to have limited assets or liquidity on a monthly
15 basis, he arranged to retain counsel in this case.

16 Consistent with the parties' plea agreement and the nature and
17 circumstances of defendant's money laundering offense of conviction
18 here, the government is not aware of compensable restitution that is
19 owed by defendant at this time.⁵

20 Finally, the government concurs with the USPO's recommendation
21 that defendant pay the \$100 special assessment, which is mandatory in
22 this case.

23 **VII. CONCLUSION**

24 For the reasons set forth above, the government respectfully

25 ⁵ Should further facts come to light supporting a compensable
26 restitution amount as to defendant as a result of the government's
27 ongoing efforts to follow the money in this case, the government
28 reserves the right to return to the Court to seek to modify the
sentence as to restitution at a later time, to the extent permitted
by governing law.

1 requests that defendant be sentenced as follows: (1) 10 months'
2 imprisonment; (2) a two-year period of supervised release to follow;
3 (3) a fine to be determined by the Court; (4) no restitution to be
4 ordered at this time; and (5) a mandatory special assessment of \$100.

PROOF OF SERVICE

I, Brian R. Faerstein, declare:

That I am a citizen of the United States and a resident of or employed in Los Angeles County, California; that my business address is the Office of the United States Attorney, 312 North Spring Street, Los Angeles, California 90012; that I am over the age of 18; and that I am not a party to the above-titled action;

That I am employed by the United States Attorney for the Central District of California, who is a member of the Bar of the United States District Court for the Central District of California, at whose direction I served a copy of:

GOVERNMENT'S SENTENCING POSITION FOR DEFENDANT ARMAN HAYRAPETYAN

upon United States Probation Officer Cristina Torres by way of email addressed to Cristina_Torres@cacp.uscourts.gov.

This Proof of Service is executed on September 13, 2021, at Los Angeles, California.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.



Brian R. Faerstein