

EXHIBIT A

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES
SPECIAL STATEWIDE GRAND JURY

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

1. TAMARA DADYAN, (DOB 10/31/1981),
a/k/a "Tammy,"
2. RICHARD AYVAZYAN, (DOB 08/02/1978),
a/k/a "Richard Ayvazian,"
a/k/a "Rich,"
a/k/a "Richo,"
3. ARTUR AYVAZYAN, (DOB 02/09/1980),
a/k/a "Arthur,"
a/k/a "Art,"
4. GRIGOR TATOIAN, (DOB 07/16/1970),
a/k/a "Greg,"
5. ANDRANIK PETROSYAN, (DOB 01/15/1975)
a/k/a "Andy,"
a/k/a "Ando,"
6. ARSHAK BARTOUMIAN (07/26/1972),
7. ARTASHES MARTIROSYAN, (DOB 08/30/1977),
a/k/a "Art,"
8. LILIT MALYAN, (DOB 04/08/1982),
a/k/a "Lilo,"
9. LUBIA CARRILLO (DOB 08/26/1980),
10. ROSA ZARATE, (DOB 11/07/1971),
a/k/a "Roza Avakian,"
11. ESTEPHANIE REYNOSO (DOB 12/04/1989),
12. VANESSA BELL (05/20/1960),

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ORIGINAL FILED
Superior Court of California
County of Los Angeles

APR 26 2021

Sherri R. Carter, Executive Officer/Clerk of Court
By: B. Perez, Deputy

INDICTMENT

Defendants.

1 A Special Statewide Grand Jury of the County of Los Angeles, State of California, accuses
2 the following defendants of committing, in the Counties of Los Angeles, Riverside, and Ventura,
3 before the finding of this indictment, of the following crimes:

4 COUNT 1

5 CONSPIRACY TO COMMIT GRAND THEFT (Re: Anthony A.)

6 On or about and between May 1, 2015, and October 7, 2019, in the COUNTY of LOS
7 ANGELES, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony,
8 was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN,
9 ARTASHES MARTIROSYAN, GRIGOR TATOIAN, ESTEPHANIE REYNOSO, and ROSA
10 ZARATE, who did willfully and unlawfully conspire together with another person or persons
11 whose identity is known or unknown to commit the crime of GRAND THEFT BY FALSE
12 PRETENSES, 487(a), of the California Penal Code, a felony, pursuant to and for the purpose of
13 carrying out the objects and purposes of the aforesaid conspiracy, Defendants committed the
14 following overt act(s):

15 OVERT ACT 1

16 On or about April 12, 2016, Tamara DADYAN emailed Grigor TATOIAN with the subject
17 "Anthony DL copy and no he dosent have account at wells his the Corp president have your friend
18 open one for him," attaching a driver's license in Anthony A's name.

19 OVERT ACT 2

20 On or about April 15, 2016, Tamara DADYAN emailed Grigor TATOIAN with the subject
21 "Here u go Anthony Andrew," and attached California Driver's Licenses in the names of Anthony
22 A. and Andrew A.

23 OVERT ACT 3

24 On or about May 26, 2016, Artur AYVAZYAN posed as Anthony A. and signed a Deed of
25 Trust for a \$1.84 million loan from the Bleecker Family Trust, secured by the property located at
26 5141 Genesta Avenue in Encino, California.

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1 OVERT ACT 4

2 On or about July 5, 2016, Richard AYVAZYAN posed as Anthony A. via email in order to
3 obtain \$218,597 from Ygrene Energy Fund for purported improvements to his home at 5141
4 Genesta.

5 OVERT ACT 5

6 On or about July 5, 2016, Richard AYVAZYAN emailed Tamara DADYAN with the subject
7 line, "List of other repairs that YGRENE will finance."

8 OVERT ACT 6

9 On or about November 3, 2016, Richard AYVAZYAN emailed Tamara DADYAN with the
10 subject, "INVENTORY OF ALL PROJECTS," and attached a spreadsheet that detailed the status
11 of Ygrene and Renew funding as to different addresses and names, including Anthony A.

12 OVERT ACT 7

13 On or about November 22, 2016, Richard AYVAZYAN emailed Tamara DADYAN, using
14 Anthony A.'s name, with the subject, "TIN REQUEST," writing, "TAM, I FILLED OUT THE
15 FORM. WE JUST NEED TO FAX IT. I DON'T HAVE A FAX AT THE OFFICE. ALSO, I USED
16 THE LITHUANIA ADDRESS, MAKE SURE WE CAN STILL GET MAIL THERE."
17 AYVAZYAN attached an Employer Identification Number application in the name of Andrew A.
18 and SAVS Enterprise.

19 OVERT ACT 8

20 On or about December 5, 2016, Rosa ZARATE used a U.S. Bank ATM to access the account
21 ending in -9086, held in Anthony A.'s name.

22 OVERT ACT 9

23 On or about December 21, 2016, Richard AYVAZYAN sent Tamara DADYAN statements
24 from a U.S. Bank account ending in -9086 held in the name of Anthony A.

25 OVERT ACT 10

26 On or about April 4, 2017, Richard AYVAZYAN posed as Anthony A. to obtain \$21,900
27 from Renew Funding for purported improvements to 22330 Victory Blvd., Unit No. 303 in
28 Woodland Hills.

1 OVERT ACT 11

2 On or about April 4, 2017, Richard AYVAZIAN posed as Anthony A. to obtain \$24,800
3 from Ygrene Energy Fund for purported improvements to 22330 Victory Blvd., Unit No. 303.

4 OVERT ACT 12

5 On or about May 7, 2017, Richard AYVAZIAN posed as Anthony A. via email in order to
6 obtain \$199,940 from Renew Funding for purported improvements to his home at 5141 Genesta.

7 OVERT ACT 13

8 On or about June 15, 2017, Richard AYVAZIAN posed as Anthony A. via email in order to
9 obtain a \$1,500,000 loan from EastWest Bank for his Genesta home.

10 OVERT ACT 14

11 On or about August 16, 2017, Artur AYVAZIAN posed as Anthony A. and signed a grant
12 deed to Susanna M. for the 5141 Genesta property.

13 OVERT ACT 15

14 On or about April 5, 2018, Richard AYVAZIAN emailed Tamara DADYAN a recorded
15 "Notice of Default" on a loan taken out in Anthony A.'s name for the property located at 22330
16 Victory Blvd., #303, in Woodland Hills, and asked her, "How do we stop the sale?"

17 OVERT ACT 16

18 On or about June 5, 2018, Tamara DADYAN emailed Artashes MARTIROSYAN a
19 document titled, "14808 Aztec Family Trust," that listed Anthony A. as a Successor Trustee and
20 was purportedly notarized by Pauline S. on February 8, 2018.

21 OVERT ACT 17

22 On or about June 20, 2018, Richard AYVAZIAN emailed Tamara DADYAN, using
23 Anthony A.'s name, regarding a Ygrene Energy Fund representative's requests.

24 OVERT ACT 18

25 On or about July 18, 2018, Richard AYVAZIAN emailed Vanessa BELL, using Anthony
26 A.'s name, and told BELL to email another PACE company "saying that you would like to cancel
27 the project with the current Contractor."

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COUNT 2

UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Anthony A.)

On or about May 7, 2017, in the COUNTY of LOS ANGELES, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, ARTASHES MARTIROSYAN, GRIGOR TATOIAN, ESTEPHANIE REYNOSO, and ROSA ZARATE, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey the personal identifying information of another person, to wit: ANTHONY A.'S NAME ON A RENEW FUNDING AGREEMENT TO PAY ASSESSMENT AND FINANCE IMPROVEMENTS AS TO 5141 GENESTA AVENUE IN ENCINO, CALIFORNIA.

COUNT 3

GRAND THEFT (Re: Anthony A.)

On or about and between February 1, 2017, and June 28, 2017, in the COUNTY of LOS ANGELES, the crime of GRAND THEFT in violation of Penal Code section 487(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, ARTASHES MARTIROSYAN, GRIGOR TATOIAN, ESTEPHANIE REYNOSO, and ROSA ZARATE, who did knowingly and designedly, by a false or fraudulent representation or pretense, obtain money, or real property by fraud from RENEW FUNDING, SPECIFICALLY, \$199,940 FOR 5141 GENESTA AVENUE IN ENCINO, CALIFORNIA, which had a value exceeding nine hundred fifty dollars (\$950).

COUNT 4

MORTGAGE FRAUD (Re: Anthony A.)

On or about and between March 29, 2017, and July 31, 2017, in the COUNTY of LOS ANGELES, the crime of MORTGAGE FRAUD in violation of Penal Code section 532f(a)(2), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, ARTASHES MARTIROSYAN, GRIGOR TATOIAN, ESTEPHANIE REYNOSO, and ROSA ZARATE, who did unlawfully and deliberately use or facilitate the use of a misstatement, misrepresentation, or omission, with the knowledge it contained a misstatement,

misrepresentation, or omission, during the mortgage lending process, with the intention that it be relied upon by a mortgage lender, borrower, or other party to the mortgage lending process, to wit: EAST WEST BANK. It is further alleged, pursuant to Penal Code section 532f(j), that the value of the fraud exceeds \$950.

COUNT 5

GRAND THEFT (Re: Anthony A.)

On or about and between March 8, 2017, and August 23, 2017, in the COUNTY of LOS ANGELES, the crime of GRAND THEFT in violation of Penal Code section 487(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, ARTASHES MARTIROSYAN, GRIGOR TATOIAN, ESTEPHANIE REYNOSO, and ROSA ZARATE, who did knowingly and designedly, by a false or fraudulent representation or pretense, obtain money, labor or real and personal property by fraud from EAST WEST BANK, SPECIFICALLY, A \$1,500,000 LOAN FOR 5141 GENESTA AVENUE IN ENCINO, CALIFORNIA, which had a value exceeding nine hundred fifty dollars (\$950).

COUNT 6

UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Anthony A.)

On or about July 13, 2017, in the COUNTY of LOS ANGELES, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, ARTASHES MARTIROSYAN, GRIGOR TATOIAN, ESTEPHANIE REYNOSO, and ROSA ZARATE, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey the personal identifying information of another person, to wit: ANTHONY A.'S NAME ON RECORDED DOCUMENT NO. 20170862745, A \$1,500,000 EAST WEST BANK DEED OF TRUST FOR 5141 GENESTA AVENUE IN ENCINO, CALIFORNIA.

COUNT 7

PROCURING OR OFFERING FALSE OR FORGED INSTRUMENT (Re: Anthony A.)

On or about July 13, 2017, in the COUNTY of LOS ANGELES, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT in violation of Penal Code section

1 115(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR
2 AYVAZYAN, ARTASHES MARTIROSYAN, GRIGOR TATOIAN, ESTEPHANIE
3 REYNOSO, and ROSA ZARATE, who did unlawfully and knowingly procure or offer a false or
4 forged instrument to be filed, registered, or recorded in a public office in California, which
5 instrument, if genuine, might be filed, registered, or recorded under a law of California or the United
6 States, to wit: RECORDED DOCUMENT NO. 20170862745, EAST WEST BANK DEED OF
7 TRUST FOR 5141 GENESTA AVENUE.

8 **COUNT 8**

9 **MORTGAGE FRAUD EXCEEDING \$950: FILING A FRAUDULENT DOCUMENT**

10 **(Re: Anthony A.)**

11 On or about July 13, 2017, in the COUNTY of LOS ANGELES, the crime of FILING A
12 FRAUDULENT DOCUMENT in violation of Penal Code section 532f(a)(4), a felony, was
13 committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN,
14 ARTASHES MARTIROSYAN, GRIGOR TATOIAN, ESTEPHANIE REYNOSO, and ROSA
15 ZARATE, who did with the intent to defraud, file or cause to be filed with the recorder of any
16 county in connection with a mortgage loan transaction, a document with the knowledge the
17 document contains a deliberate misstatement, misrepresentation, or omission, to wit: RECORDED
18 DOCUMENT NO. 20170862745, EAST WEST BANK DEED OF TRUST FOR 5141 GENESTA
19 AVENUE. It is further alleged that the value of the fraud exceeds nine hundred fifty dollars (\$950),
20 within the meaning of Penal Code section 532f(j).

21 **COUNT 9**

22 **UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Anthony A.)**

23 On or about July 27, 2017, in the COUNTY of LOS ANGELES, the crime of IDENTITY
24 THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA
25 DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, ARTASHES MARTIROSYAN,
26 GRIGOR TATOIAN, ESTEPHANIE REYNOSO, and ROSA ZARATE, who did willfully and
27 unlawfully with the intent to defraud sell, transfer, or convey the personal identifying information
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1 of another person, to wit: ANTHONY A.'S NAME THROUGH THE USE OF THE "LOGIC360"
2 EMAIL ACCOUNT.

3 **COUNT 10**

4 **UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Anthony A.)**

5 On or about August 16, 2017, in the COUNTY of LOS ANGELES, the crime of IDENTITY
6 THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA
7 DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, ARTASHES MARTIROSYAN,
8 GRIGOR TATOIAN, ESTEPHANIE REYNOSO, and ROSA ZARATE, who did willfully and
9 unlawfully with the intent to defraud sell, transfer, or convey the personal identifying information
10 of another person, to wit: ANTHONY A.'S NAME ON RECORDED DOCUMENT NO.
11 20170956081, GRANT DEED FOR 5141 GENESTA.

12 **COUNT 11**

13 **PROCURING OR OFFERING FALSE OR FORGED INSTRUMENT (Re: Anthony A.)**

14 On or about August 16, 2017, in the COUNTY of LOS ANGELES, the crime of
15 PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT in violation of Penal
16 Code section 115(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN,
17 ARTUR AYVAZYAN, ARTASHES MARTIROSYAN, GRIGOR TATOIAN, ESTEPHANIE
18 REYNOSO, and ROSA ZARATE, who did unlawfully and knowingly procure or offer a false or
19 forged instrument to be filed, registered, or recorded in a public office in California, which
20 instrument, if genuine, might be filed, registered, or recorded under a law of California or the United
21 States, to wit: RECORDED DOCUMENT NO. 20170956081, GRANT DEED FOR 5141
22 GENESTA.

23 **COUNT 12**

24 **MORTGAGE FRAUD EXCEEDING \$950: FILING A FRAUDULENT DOCUMENT**

25 **(Re: Anthony A.)**

26 On or about August 16, 2017, in the COUNTY of LOS ANGELES, the crime of FILING A
27 FRAUDULENT DOCUMENT in violation of Penal Code section 532f(a)(4), a felony, was
28 committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN,

ARTASHES MARTIROSYAN, GRIGOR TATOIAN, ESTEPHANIE REYNOSO, and ROSA ZARATE, who did with the intent to defraud, file or cause to be filed with the recorder of any county in connection with a mortgage loan transaction, a document with the knowledge the document contains a deliberate misstatement, misrepresentation, or omission, to wit: RECORDED DOCUMENT NO. 20170956081, GRANT DEED FOR 5141 GENESTA. It is further alleged that the value of the fraud exceeds nine hundred fifty dollars (\$950), within the meaning of Penal Code section 532f(j).

COUNT 13

PROCURING OR OFFERING FALSE OR FORGED INSTRUMENT (Re: John W.)

On or about October 7, 2019, in the COUNTY of LOS ANGELES, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a felony, was committed by RICHARD AYVAZYAN, TAMARA DADYAN, ARTUR AYVAZYAN, ARTASHES MARTIROSYAN, GRIGOR TATOIAN, ESTEPHANIE REYNOSO, and ROSA ZARATE, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: GRANT DEED, RECORDED DOCUMENT NO. 20200120383.

COUNT 14

CONSPIRACY TO COMMIT GRAND THEFT

(Re: Andrew A., Sarkis B., & Says Enterprise)

On or about and between January 31, 2014, and October 14, 2019, in the COUNTY of LOS ANGELES, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, LILIT MALYAN, GRIGOR TATOIAN, ARTASHES MARTIROSYAN, ROSA ZARATE, ESTEPHANIE REYNOSO, LUBIA CARRILLO, and VANESSA RAY BELL, who did willfully and unlawfully conspire together with another person or persons whose identity is known or unknown to commit the crime of GRAND THEFT BY FALSE PRETENSES, 487(a), of the

1 California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects and
2 purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

3 OVERT ACT 1

4 On or about March 23, 2016, Tamara DADYAN and Estephanie REYNOSO created a Yahoo
5 email account using the name of Sarkis B. and the related business, SAVS Enterprise.

6 OVERT ACT 2

7 On or about April 12, 2016, Vanessa BELL provided Evidence of Insurance in Andrew A.'s
8 name for the property located at 3946 Knobhill Drive in Sherman Oaks.

9 OVERT ACT 3

10 On or about April 29, 2016, Tamara DADYAN emailed Grigor TATOIAN with the subject,
11 "Contractor that's licensed," and attached images of a Contractors State License Board (CSLB)
12 card in the name of "SAVS ENTERPRISES" as well as a business tax certificate for Sarkis B.,
13 SAVS Enterprises, and a driver's license in the name of Sarkis B.

14 OVERT ACT 4

15 On or about May 6, 2016, Tamara DADYAN used Andrew A.'s name to obtain \$993,670.41
16 in proceeds from a Banc of California loan for the property located at 3946 Knobhill in Sherman
17 Oaks, California.

18 OVERT ACT 5

19 On or about July 25, 2016, Tamara DADYAN emailed Grigor TATOIAN a Fictitious
20 Business Name Statement (FBN) for "SAVS ENTERPRISE" that listed Andrew A. as the
21 registered owner.

22 OVERT ACT 6

23 On or about July 26, 2016, Grigor TATOIAN replied to DADYAN's email regarding the
24 "SAVS ENTERPRISE" FBN and asked, "Whats this? New account needed?" to which DADYAN
25 replied, "Yes."

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1 OVERT ACT 7

2 On or about July 29, 2016, Richard AYVAZYAN used a Bank of America account ending
3 in -6529, held in Andrew A.'s name "DBA SAVS ENTERPRISE", to obtain \$218,597 from Ygrene
4 Energy Fund for purported improvements to his home at 5141 Genesta Avenue, Encino, California.

5 OVERT ACT 8

6 On or about August 1, 2016, Richard AYVAZYAN used the Bank of America account ending
7 in -6529 held in Andrew A.'s name to transfer \$210,000 of the Ygrene proceeds to a Bank of
8 America account ending in -6898 that he controlled in Vahan T.'s name.

9 OVERT ACT 9

10 On or about September 16, 2016, Richard AYVAZYAN used the Bank of America account
11 ending in -6529 held in Andrew A.'s name to obtain \$86,627 from Ygrene Energy Fund for
12 purported improvements to a property in Melanya A.'s name located at 6556 Andasol Avenue in
13 Van Nuys.

14 OVERT ACT 10

15 On or about September 19, 2016, Richard AYVAZYAN, Estephanie REYNOSO, and Rosa
16 ZARATE used the Bank of America account ending in -6529 held in Andrew A.'s name to transfer
17 \$40,000 to an account ending in -0865 held in the name of "Tammy DADYAN Investments."

18 OVERT ACT 11

19 On or about September 19, 2016, Richard AYVAZYAN, Estephanie REYNOSO, and Rosa
20 ZARATE used the Bank of America account ending in -6529 held in Andrew A.'s name to transfer
21 \$5,000 to a U.S. Bank account ending in -6086 held in Osbaldo V.'s name.

22 OVERT ACT 12

23 On or about September 19, 2016, Richard AYVAZYAN, Estephanie REYNOSO, and Rosa
24 ZARATE used the Bank of America account ending in -6529 held in Andrew A.'s name to transfer
25 \$5,050 to a Wells Fargo account ending in -3333 held in Andrew A.'s name.

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1 OVERT ACT 13

2 On or about September 19, 2016, Richard AYVAZYAN, Estephanie REYNOSO, and Rosa
3 ZARATE used the Bank of America account ending in -6529 held in Andrew A.'s name to transfer
4 \$36,100 to a Bank of America account ending in -3470 held in Andrew A.'s name.

5 OVERT ACT 14

6 On or about September 20, 2016, Richard AYVAZYAN, Estephanie REYNOSO, and Rosa
7 ZARATE used the Bank of America account ending in -3470 held in Andrew A.'s name to transfer
8 \$20,434.23 to a Wells Fargo account ending in -1754 held in the name of "Secureline Realty and
9 Funding," Tamara DADYAN's business.

10 OVERT ACT 15

11 On or about September 28, 2016, Richard AYVAZYAN used the Bank of America account
12 ending in -6529 held in Andrew A.'s name to obtain \$31,565 from Ygrene Energy Fund for
13 purported improvements to a property in Suzanne B.'s name located at 4915 Bellaire Avenue in
14 Valley Village.

15 OVERT ACT 16

16 On or about September 30, 2016, Richard AYVAZYAN used Andrew A.'s name to privately
17 register the website domain "savsenterprise.com."

18 OVERT ACT 17

19 On or about October 3, 2016, Rosa ZARATE withdrew \$500 from the Bank of America
20 account ending in -6529 held in Andrew A.'s name.

21 OVERT ACT 18

22 On or about October 4, 2016, Richard AYVAZYAN used the Bank of America account
23 ending in -6529 held in Andrew A.'s name to pay \$1,091 for the rent of an office located at 5525
24 Oakdale Avenue in Woodland Hills.

25 OVERT ACT 19

26 On or about October 5, 2016, Richard AYVAZYAN used the Bank of America account
27 ending in -6529 held in Andrew A.'s name to obtain \$91,035 from Ygrene Energy Fund for
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1 purported improvements to a property in Suzanne B.'s name located at 4915 Bellaire Avenue in
2 Valley Village.

3 OVERT ACT 20

4 On or about October 14, 2016, Richard AYVAZYAN used the Bank of America account
5 ending in -6529 held in Andrew A.'s name to obtain \$63,200 from Ygrene Energy Fund for
6 purported improvements to a property in Grigor G.'s name located at 12607 Willard Street in North
7 Hollywood.

8 OVERT ACT 21

9 On or about October 18, 2016, Richard AYVAZYAN, Estephanie REYNOSO, and Rosa
10 ZARATE used the Bank of America account ending in -6529 held in Andrew A.'s name to transfer
11 \$6,300 to a Bank of America account ending in -8003 that he controlled in Andrew A.'s name.

12 OVERT ACT 22

13 On or about October 20, 2016, Richard AYVAZYAN, Estephanie REYNOSO, and Rosa
14 ZARATE used the Bank of America account ending in -6529 held in Andrew A.'s name to wire
15 \$60,000 to a Bank of America account ending in -4312 that was held in Suzanne B.'s name.

16 OVERT ACT 23

17 On or about November 1, 2016, Richard AYVAZYAN used the Bank of America account
18 ending in -6529 held in Andrew A.'s name to obtain \$69,880 from Ygrene Energy Fund for
19 purported improvements to a property in Mykhailo D.'s name located at 1124 S. Normandie in Los
20 Angeles.

21 OVERT ACT 24

22 On or about November 14, 2016, Richard AYVAZYAN used the Bank of America account
23 ending in -6529 held in Andrew A.'s name to obtain \$64,495 from Ygrene Energy Fund for
24 purported improvements to a property in Grigor G.'s name located at 12607 Willard in North
25 Hollywood.

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1 OVERT ACT 25

2 On or about November 18, 2016, Richard AYVAZYAN used the Bank of America account
3 ending in -6529 held in Andrew A.'s name to obtain \$82,395 from Ygrene Energy Fund for
4 purported improvements to a property in Peter R.'s name located at 17359 Victory in Van Nuys.

5 OVERT ACT 26

6 On or about November 22, 2016, Richard AYVAZYAN emailed Tamara DADYAN, using
7 Anthony A.'s name, with the subject, "TIN REQUEST," writing, "TAM, I FILLED OUT THE
8 FORM. WE JUST NEED TO FAX IT. I DON'T HAVE A FAX AT THE OFFICE. ALSO, I USED
9 THE LITHUANIA ADDRESS, MAKE SURE WE CAN STILL GET MAIL THERE."
10 AYVAZYAN attached an Employer Identification Number application in the name of Andrew A.
11 and SAVS Enterprise.

12 OVERT ACT 27

13 On or about November 23, 2016, Richard AYVAZYAN used the Bank of America account
14 ending in -6529 held in Andrew A.'s name to obtain \$79,155 from Renew Funding for purported
15 improvements to a property in Peter R.'s name located at 17359 Victory in Van Nuys.

16 OVERT ACT 28

17 On or about November 28, 2016, Richard AYVAZYAN used the Bank of America account
18 ending in -6529 held in Andrew A.'s name to obtain \$62,175 from Renew Funding for purported
19 improvements to a property in Anastasia A.'s name located at 15203 Leadwell in Van Nuys.

20 OVERT ACT 29

21 On or about November 30, 2016, Richard AYVAZYAN used the Bank of America account
22 ending in -6529 held in Andrew A.'s name to obtain \$59,125 from Ygrene Energy Fund for
23 purported improvements to a property in Anastasia A.'s name located at 15203 Leadwell in Van
24 Nuys.

25 OVERT ACT 30

26 On or about December 12, 2016, Richard AYVAZYAN emailed Tamara DADYAN with the
27 subject, "Need Financials for Savs," writing "Send this to Razmik," listing "Savs Enterprise –
28 General Contractor," an address on Lithuania Drive in Granada Hills, and a phone number ending

1 in -0801. Richard AYVAZYAN also wrote, "Need to show Gross sales of \$2,080,030 up to date.
2 Show about 15% net profit from the Gross."

3 OVERT ACT 31

4 On or about January 17, 2017, Richard AYVAZYAN emailed Tamara DADYAN with the
5 subject "SAVS Info for new account" and attached a Federal Employee Identification Number
6 (EIN) ending in -1495 for the business SAVS ENTERPRISE, as well as a Fictitious Business Name
7 Statement for SAVS ENTERPRISE filed and signed in Andrew A.'s name with the Los Angeles
8 County Clerk.

9 OVERT ACT 32

10 On or about January 17, 2017, Tamara DADYAN forwarded Richard AYVAZYAN's email
11 regarding "SAVS Info for new account" to Grigor TATOIAN.

12 OVERT ACT 33

13 On or about January 24, 2017, Richard AYVAZYAN used the U.S. Bank account ending in
14 -2662 held in Andrew A.'s name to obtain \$119,145 from Renew Funding for purported
15 improvements to a property in Larisa K.'s name located at 13546 Sarah Street in Sherman Oaks.

16 OVERT ACT 34

17 On or about January 25, 2017, Rosa ZARATE deposited a \$10,000 check from the U.S. Bank
18 account ending in -2662 held in Andrew A.'s name to a U.S. Bank account ending in -0458 held in
19 the name of Egia K.

20 OVERT ACT 35

21 On or about January 31, 2017, Richard AYVAZYAN used the U.S. Bank account ending in
22 -2662 held in Andrew A.'s name to obtain \$134,275 from Renew Funding for purported
23 improvements to a property in Tetiana V.'s located at 4050 Camino de la Cumbre in Los Angeles.

24 OVERT ACT 36

25 On or about February 27, 2017, Richard AYVAZYAN used the U.S. Bank account ending
26 in -2662 held in Andrew A.'s name to obtain \$88,550 from Renew Funding for purported
27 improvements to a property in Liudmyla K.'s name located at 8400 Natalie Lane in West Hills.

28 //

1 OVERT ACT 37

2 On or about March 7, 2017, Richard AYVAZYAN used the U.S. Bank account ending in -
3 2662 held in Andrew A.'s name to obtain \$56,550 from Ygrene Energy Fund for purported
4 improvements to a property in Anna P.'s name located at 14808 Aztec Street in Sylmar.

5 OVERT ACT 38

6 On or about March 10, 2017, Richard AYVAZYAN used the U.S. Bank account ending in -
7 2662 held in Andrew A.'s name to obtain \$60,000 from Ygrene Energy Fund for purported
8 improvements to a property in Susanna M.'s name located at 8937 Haskell Avenue in North Hills.

9 OVERT ACT 39

10 On or about March 10, 2017, Richard AYVAZYAN used the U.S. Bank account ending in -
11 2662 held in Andrew A.'s name to obtain \$131,700 from Renew Funding for purported
12 improvements to a property in Fatima J.'s name located at 12334 Longacre Avenue in Granada
13 Hills.

14 OVERT ACT 40

15 On or about March 10, 2017, Richard AYVAZYAN, Estephanie REYNOSO, and Rosa
16 ZARATE deposited a \$37,500 check made to "Cash" from the U.S. Bank account ending in -2662
17 held in Andrew A.'s name to the Bank of America account ending in -6898 held in Vahan T.'s
18 name that Richard AYVAZYAN controlled.

19 OVERT ACT 41

20 On or about March 16, 2017, Richard AYVAZYAN, Estephanie REYNOSO, and Rosa
21 ZARATE deposited a \$9,600 check made to "Cash" from the U.S. Bank account ending in -2662
22 held in Andrew A.'s name to the Bank of America account ending in -4999 held in Vahan T.'s
23 name that Richard AYVAZYAN controlled.

24 OVERT ACT 42

25 On or about March 17, 2017, Richard AYVAZYAN used the U.S. Bank account ending in -
26 2662 held in Andrew A.'s name to obtain \$74,300 from Ygrene Energy Fund for purported
27 improvements to a property in Liudmyla K.'s name located at 8400 Natalie Lane in West Hills.

28 //

1 OVERT ACT 43

2 On or about March 20, 2017, Richard AYVAZIAN used the U.S. Bank account ending in -
3 2662 held in Andrew A.'s name to obtain \$70,150 from Renew Funding for purported
4 improvements to a property in Susanna M.'s name located at 8937 Haskell Avenue in North Hills.

5 OVERT ACT 44

6 On or about March 20, 2017, Rosa ZARATE deposited a \$66,870 check to "Cash" from the
7 U.S. Bank account ending in -2662 held in Andrew A.'s name to a Bank of America account ending
8 in -4408.

9 OVERT ACT 45

10 On or about March 22, 2017, Richard AYVAZIAN used the U.S. Bank account ending in -
11 2662 held in Andrew A.'s name to obtain \$24,800 from Ygrene Energy Fund for purported
12 improvements to a property in Anthony A.'s name located at 22330 Victory Boulevard, No. 303,
13 in Woodland Hills.

14 OVERT ACT 46

15 On or about April 7, 2017, Richard AYVAZIAN used the U.S. Bank account ending in -
16 2662 held in Andrew A.'s name to obtain \$21,900 from Renew Funding for purported
17 improvements to a property in Anthony A.'s name located at 22330 Victory Boulevard, No. 303,
18 in Woodland Hills.

19 OVERT ACT 47

20 On or about April 28, 2017, Richard AYVAZIAN used the U.S. Bank account ending in -
21 2662 held in Andrew A.'s name to obtain \$103,600 from Renew Funding for purported
22 improvements to a property in Lilit MALYAN's name located at 11633 Spy Glass in Northridge.

23 OVERT ACT 48

24 On or about May 1, 2017, Richard AYVAZIAN used the U.S. Bank account ending in -
25 2662 held in Andrew A.'s name to obtain \$43,260 from Renew Funding for purported
26 improvements to a property in Melanya A.'s name located at 3520 Ridgeford in Westlake Village.

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1 OVERT ACT 49

2 On or about May 3, 2017, Richard AYVAZYAN used the U.S. Bank account ending in -
3 2662 held in Andrew A.'s name to obtain \$72,600 from Renew Funding for purported
4 improvements to a property in Armen I.'s name located at 2080 Riverbirch Drive in Simi Valley.

5 OVERT ACT 50

6 On or about May 5, 2017, Richard AYVAZYAN used the U.S. Bank account ending in -
7 2662 held in Andrew A.'s name to obtain \$68,000 from Ygrene Energy Fund for purported
8 improvements to a property in Aram S.'s name located at 8112 Crosnoe Avenue in Panorama City.

9 OVERT ACT 51

10 On or about May 9, 2017, Richard AYVAZYAN used the U.S. Bank account ending in -
11 2662 held in Andrew A.'s name to obtain \$81,360 from Renew Funding for purported
12 improvements to a property in Liudmyla K.'s name located at 2162 Rohner Avenue in Simi Valley.

13 OVERT ACT 52

14 On or about May 10, 2017, Richard AYVAZYAN used the U.S. Bank account ending in -
15 2662 held in Andrew A.'s name to obtain \$113,625 from Ygrene Energy Fund for purported
16 improvements to a property located at 12334 Longacre Avenue in Granada Hills.

17 OVERT ACT 53

18 On or about May 19, 2017, Lubia CARRILLO accepted a \$50,000 check issued from the
19 U.S. Bank account ending in -2662 held in Andrew A.'s name.

20 OVERT ACT 54

21 On or about May 25, 2017, Richard AYVAZYAN used the U.S. Bank account ending in -
22 2662 held in Andrew A.'s name to obtain \$70,200 from Renew Funding for purported
23 improvements to a property located at 8112 Crosnoe Avenue in Panorama City.

24 OVERT ACT 55

25 On or about May 30, 2017, Richard AYVAZYAN used the U.S. Bank account ending in -
26 2662 held in Andrew A.'s name to obtain \$100,940 from Renew Funding for purported
27 improvements to a property located at 3520 Ridgeford in Westlake Village.

28 //

1 OVERT ACT 56

2 On or about June 13, 2017, Richard AYVAZIAN used the U.S. Bank account ending in -
3 2662 held in Andrew A.'s name to obtain \$47,000 from Ygrene Energy Fund for purported
4 improvements to a property located at 15821 Kingsbury in Granada Hills.

5 OVERT ACT 57

6 On or about June 23, 2017, Richard AYVAZIAN used the U.S. Bank account ending in -
7 2662 held in Andrew A.'s name to obtain \$115,000 from Ygrene Energy Fund for purported
8 improvements to a property located at 14212 Chandler Boulevard in Los Angeles.

9 OVERT ACT 58

10 On or about June 27, 2017, Richard AYVAZIAN used the U.S. Bank account ending in -
11 2662 held in Andrew A.'s name to obtain \$53,500 from Renew Funding for purported
12 improvements to a property located at 15821 Kingsbury Street in Granada Hills.

13 OVERT ACT 59

14 On or about June 28, 2017, Richard AYVAZIAN used the U.S. Bank account ending in -
15 2662 held in Andrew A.'s name to obtain \$139,958 from Renew Funding for purported
16 improvements to his home located at 5141 Genesta Avenue in Encino.

17 OVERT ACT 60

18 On or about July 3, 2017, Richard AYVAZIAN used the U.S. Bank account ending in -2662
19 held in Andrew A.'s name to obtain \$78,960 from Renew Financial for purported improvements to
20 a property located at 14212 Chandler Boulevard in Los Angeles.

21 OVERT ACT 61

22 On or about August 2, 2017, Richard AYVAZIAN used a key to open the office located at
23 5525 Oakdale, and he, along with Rosa ZARATE and Estephanie REYNOSO, entered the office.

24 OVERT ACT 62

25 On or about August 2, 2017, Rosa ZARATE left the 5525 Oakdale office and drove to
26 17450 Weddington Street, Tamara DADYAN's residence.

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28 //

1 OVERT ACT 63

2 On or about August 15, 2017, Richard AYVAZYAN used the U.S. Bank account ending in
3 -2662 held in Andrew A.'s name to obtain \$73,200 from Ygrene Energy Fund for purported
4 improvements to a property located at 7106 Jellico Avenue in Van Nuys.

5 OVERT ACT 64

6 On or about September 6, 2017, Richard AYVAZYAN used a U.S. Bank account ending in
7 -2287 held in Andrew A.'s name to obtain \$86,400 from Ygrene Energy Fund for purported
8 improvements to a property located at 8150 Day Street in Sunland.

9 OVERT ACT 65

10 On or about July 19, 2018, Tamara DADYAN stated under sworn testimony that Andrew
11 A. was a client.

12 OVERT ACT 66

13 On or about October 14, 2019, Grigor TATOIAN emailed a lease dated July 1, 2018, that
14 was purportedly signed by Andrew A. as the landlord of 1603 New York Drive in Altadena.

15 **COUNT 15**

16 **GRAND THEFT (Re: Andrew A.)**

17 On or about and between March 22, 2017, and May 3, 2017, in the COUNTIES of LOS
18 ANGELES and VENTURA, the crime of GRAND THEFT in violation of Penal Code section
19 487(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR
20 AYVAZYAN, LILIT MALYAN, GRIGOR TATOIAN, ROSA ZARATE, ESTEPHANIE
21 REYNOSO, LUBIA CARRILLO, and VANESSA RAY BELL, who did knowingly and
22 designedly, by a false or fraudulent representation or pretense, obtain money, labor or real and
23 personal property by fraud from RENEW FUNDING, SPECIFICALLY, \$72,600 FOR 2080
24 RIVERBIRCH, which had a value exceeding nine hundred fifty dollars (\$950).

25 **COUNT 16**

26 **GRAND THEFT (Re: Andrew A.)**

27 On or about and between March 14, 2017, and May 5, 2017, in the COUNTY of LOS
28 ANGELES, the crime of GRAND THEFT in violation of Penal Code section 487(a), a felony, was

1 committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, LILIT
2 MALYAN, GRIGOR TATOIAN, ROSA ZARATE, ESTEPHANIE REYNOSO, LUBIA
3 CARRILLO, and VANESSA RAY BELL, who did knowingly and designedly, by a false or
4 fraudulent representation or pretense, obtain money by fraud from YGRENE ENERGY FUND,
5 SPECIFICALLY, \$68,000 FOR 8112 CROSNOE, which had a value exceeding nine hundred fifty
6 dollars (\$950).

7 **COUNT 17**

8 **UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Sarkis B.)**

9 On or about May 4, 2017, in the COUNTIES of LOS ANGELES and VENTURA, the crime
10 of IDENTITY THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by
11 TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, LILIT MALYAN,
12 GRIGOR TATOIAN, ROSA ZARATE, ESTEPHANIE REYNOSO, LUBIA CARRILLO, and
13 VANESSA RAY BELL, who did willfully and unlawfully with the intent to defraud sell, transfer,
14 or convey the personal identifying information of another person, to wit: SARKIS B.'S NAME
15 ON A RENEW FUNDING COMPLETION CERTIFICATE FOR 2162 ROHNER.

16 **COUNT 18**

17 **GRAND THEFT (Re: Andrew A.)**

18 On or about and between March 21, 2017, and May 9, 2017, in the COUNTIES of LOS
19 ANGELES and VENTURA, the crime of GRAND THEFT in violation of Penal Code section
20 487(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR
21 AYVAZYAN, LILIT MALYAN, GRIGOR TATOIAN, ROSA ZARATE, ESTEPHANIE
22 REYNOSO, LUBIA CARRILLO, and VANESSA RAY BELL, who did knowingly and
23 designedly, by a false or fraudulent representation or pretense, obtain money by fraud from
24 RENEW FUNDING, SPECIFICALLY, \$81,360, FOR 2162 ROHNER, which had a value
25 exceeding nine hundred fifty dollars (\$950).

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COUNT 19

UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Sarkis B.)

On or about May 8, 2017, in the COUNTY of LOS ANGELES, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZIAN, ARTUR AYVAZIAN, LILIT MALYAN, GRIGOR TATOIAN, ROSA ZARATE, ESTEPHANIE REYNOSO, LUBIA CARRILLO, and VANESSA RAY BELL, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey the personal identifying information of another person, to wit: SARKIS B.'S NAME FOR A YGRENE ENERGY FUND COMPLETION CERTIFICATE FOR 12334 LONGACRE.

COUNT 20

GRAND THEFT (Re: Andrew A.)

On or about and between March 24, 2017, and May 10, 2017, in the COUNTY of LOS ANGELES, the crime of GRAND THEFT in violation of Penal Code section 487(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZIAN, ARTUR AYVAZIAN, LILIT MALYAN, GRIGOR TATOIAN, ROSA ZARATE, ESTEPHANIE REYNOSO, LUBIA CARRILLO, and VANESSA RAY BELL, who did knowingly and designedly, by a false or fraudulent representation or pretense, obtain money, labor or real and personal property by fraud from YGRENE ENERGY FUND, SPECIFICALLY, \$113,625, FOR 12334 LONGACRE, which had a value exceeding nine hundred fifty dollars (\$950).

COUNT 21

UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Sarkis B.)

On or about May 23, 2017, in the COUNTY of LOS ANGELES, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZIAN, ARTUR AYVAZIAN, LILIT MALYAN, GRIGOR TATOIAN, ROSA ZARATE, ESTEPHANIE REYNOSO, LUBIA CARRILLO, and VANESSA RAY BELL, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey the personal identifying information of another person, to wit: SARKIS B.'S NAME FOR A RENEW FUNDING COMPLETION CERTIFICATE FOR 8112 CROSNOE.

COUNT 22

GRAND THEFT (Re: Andrew A.)

On or about and between April 13, 2017, and May 25, 2017, in the COUNTY of LOS ANGELES, the crime of GRAND THEFT in violation of Penal Code section 487(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, LILIT MALYAN, GRIGOR TATOIAN, ROSA ZARATE, ESTEPHANIE REYNOSO, LUBIA CARRILLO, and VANESSA RAY BELL, who did knowingly and designedly, by a false or fraudulent representation or pretense, obtain money, labor or real and personal property by fraud from RENEW FUNDING, SPECIFICALLY, \$70,200, FOR 8112 CROSNOW, which had a value exceeding nine hundred fifty dollars (\$950).

COUNT 23

MONEY LAUNDERING (Re: Andrew A.)

On or about and between May 2, 2017, and May 25, 2017, in the COUNTY of LOS ANGELES, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, LILIT MALYAN, GRIGOR TATOIAN, ROSA ZARATE, ESTEPHANIE REYNOSO, LUBIA CARRILLO, and VANESSA RAY BELL, who did unlawfully conduct transactions involving monetary instruments of a value exceeding \$25,000, through a financial institution knowing that the monetary instruments represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit: \$276,862.22 TOTAL THROUGH AT LEAST 13 TRANSACTIONS, AS DETAILED IN THE TABLE BELOW. It is further alleged, pursuant to Penal Code section 186.10(c)(1)(B), that the value of the transaction or transactions exceeds one hundred fifty thousand dollars (\$150,000) but is less than one million dollars (\$1,000,000).

DATE	AMOUNT	TRANSACTION
5/2/17	\$20,000	U.S. Bank -2662 check to U.S. Bank -9086
5/2/17	\$32,000	U.S. Bank -2662 check to Bank of America -6898

5/4/17	\$10,000	U.S. Bank -2662 check to Bank of America -0440
5/5/17	\$16,282.22	U.S. Bank -2662 payment to White Glass Lending
5/7/17	\$6,500	U.S. Bank -2662 check to Bank of America -4999
5/11/17	\$18,000	U.S. Bank -2662 check to Bank of America -9473
5/11/17	\$1,400	U.S. Bank -2662 check to U.S. Bank -9649
5/17/17	\$11,000	U.S. Bank -2662 check to Bank of America -0440
5/17/17	\$40,680	U.S. Bank -2662 check to U.S. Bank -2961
5/17/17	\$50,000	U.S. Bank -2662 check to Matadors Community Credit Union -7500
5/19/17	\$60,000	U.S. Bank -2662 check to Bank of America -6898
5/19/17	\$2,000	U.S. Bank -2662 check to Wells Fargo -7847
5/22/17	\$9,000	U.S. Bank -2662 check to Bank of America -0559

COUNT 24

UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Sarkis B.)

On or about May 23, 2017, in the COUNTY of LOS ANGELES, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, LILIT MALYAN, GRIGOR TATOIAN, ROSA ZARATE, ESTEPHANIE REYNOSO, LUBIA CARRILLO, and VANESSA RAY BELL, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey the personal identifying information of another person, to wit: SARKIS B.'S NAME FOR A RENEW FUNDING COMPLETION CERTIFICATE FOR 3520 RIDGEFORD.

COUNT 25

GRAND THEFT (Re: Andrew A.)

On or about and between March 2, 2017 and May 30, 2017, in the COUNTY of LOS ANGELES, the crime of GRAND THEFT in violation of Penal Code section 487(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, LILIT MALYAN, GRIGOR TATOIAN, ROSA ZARATE, ESTEPHANIE REYNOSO, LUBIA CARRILLO, and VANESSA RAY BELL, who did knowingly and designedly, by a false or

fraudulent representation or pretense, obtain money, labor or real and personal property by fraud from RENEW FUNDING, SPECIFICALLY, \$144,200, FOR 3520 RIDGEFORD, which had a value exceeding nine hundred fifty dollars (\$950).

COUNT 26

MONEY LAUNDERING (Re: Andrew A.)

On or about and between May 30, 2017, and June 27, 2017, in the COUNTY of LOS ANGELES, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, LILIT MALYAN, GRIGOR TATOIAN, ROSA ZARATE, ESTEPHANIE REYNOSO, LUBIA CARRILLO, and VANESSA RAY BELL, who did unlawfully conduct transactions involving monetary instruments of a value exceeding \$25,000, through a financial institution knowing that the monetary instruments represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit: \$185,560 TOTAL THROUGH AT LEAST FIVE TRANSACTIONS AS DETAILED IN THE TABLE BELOW. It is further alleged, pursuant to Penal Code section 186.10(c)(1)(B), that the value of the transaction or transactions exceeds one hundred fifty thousand dollars (\$150,000) but is less than one million dollars (\$1,000,000).

DATE	AMOUNT	TRANSACTION
6/1/17	\$76,000	U.S. Bank -2662 check to Bank of America -5068
6/1/17	\$9,500	U.S. Bank -2662 check to Bank of America -4999
6/1/17	\$50,000	U.S. Bank -2662 check to Bank of America -6898
6/13/17	\$4,500	U.S. Bank -2662 payment to Bank of America -9473
6/23/17	\$45,560	U.S. Bank -2662 check to Bank of America -4999

COUNT 27

UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Sarkis B.)

On or about June 20, 2017, in the COUNTY of LOS ANGELES, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA

1 DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, LILIT MALYAN, GRIGOR
2 TATOIAN, ROSA ZARATE, ESTEPHANIE REYNOSO, LUBIA CARRILLO, and VANESSA
3 RAY BELL, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey
4 the personal identifying information of another person, to wit: SARKIS B.'S NAME FOR A
5 YGRENE ENERGY FUND COMPLETION CERTIFICATE FOR 14212 CHANDLER.

6 **COUNT 28**

7 **GRAND THEFT (Re: Andrew A.)**

8 On or about and between May 15, 2017, and June 23, 2017, in the COUNTY of LOS
9 ANGELES, the crime of GRAND THEFT in violation of Penal Code section 487(a), a felony, was
10 committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, LILIT
11 MALYAN, GRIGOR TATOIAN, ROSA ZARATE, ESTEPHANIE REYNOSO, LUBIA
12 CARRILLO, and VANESSA RAY BELL, who did knowingly and designedly, by a false or
13 fraudulent representation or pretense, obtain money by fraud from YGRENE ENERGY FUND,
14 SPECIFICALLY, \$115,000, FOR 14212 CHANDLER, which had a value exceeding nine hundred
15 fifty dollars (\$950).

16 **COUNT 29**

17 **UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Sarkis B.)**

18 On or about June 8, 2017, in the COUNTY of LOS ANGELES, the crime of IDENTITY
19 THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA
20 DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, LILIT MALYAN, GRIGOR
21 TATOIAN, ROSA ZARATE, ESTEPHANIE REYNOSO, LUBIA CARRILLO, and VANESSA
22 RAY BELL, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey
23 the personal identifying information of another person, to wit: SARKIS B.'S NAME FOR A
24 YGRENE ENERGY FUND COMPLETION CERTIFICATE FOR 15821 KINGSBURY.

25 **COUNT 30**

26 **GRAND THEFT (Re: Andrew A.)**

27 On or about and between May 8, 2017, and June 13, 2017, in the COUNTY of LOS
28 ANGELES, the crime of GRAND THEFT in violation of Penal Code section 487(a), a felony, was

1 committed by TAMARA DADYAN, RICHARD AYVAZIAN, ARTUR AYVAZIAN, LILIT
2 MALYAN, GRIGOR TATOIAN, ROSA ZARATE, ESTEPHANIE REYNOSO, LUBIA
3 CARRILLO, and VANESSA RAY BELL, who did knowingly and designedly, by a false or
4 fraudulent representation or pretense, obtain money, labor or real and personal property by fraud
5 from YGRENE ENERGY FUND, SPECIFICALLY, \$47,000, FOR 15821 KINGSBURY, which
6 had a value exceeding nine hundred fifty dollars (\$950).

7 **COUNT 31**

8 **UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Sarkis B.)**

9 On or about June 23, 2017, in the COUNTY of LOS ANGELES, the crime of IDENTITY
10 THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA
11 DADYAN, RICHARD AYVAZIAN, ARTUR AYVAZIAN, LILIT MALYAN, GRIGOR
12 TATOIAN, ROSA ZARATE, ESTEPHANIE REYNOSO, LUBIA CARRILLO, and VANESSA
13 RAY BELL, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey
14 the personal identifying information of another person, to wit: SARKIS B.'S NAME FOR A
15 RENEW FUNDING COMPLETION CERTIFICATE FOR 5141 GENESTA.

16 **COUNT 32**

17 **GRAND THEFT (Re: Andrew A.)**

18 On or about and between January 26, 2017, and June 28, 2017, in the COUNTY of LOS
19 ANGELES, the crime of GRAND THEFT in violation of Penal Code section 487(a), a felony, was
20 committed by TAMARA DADYAN, RICHARD AYVAZIAN, ARTUR AYVAZIAN, LILIT
21 MALYAN, GRIGOR TATOIAN, ROSA ZARATE, ESTEPHANIE REYNOSO, LUBIA
22 CARRILLO, and VANESSA RAY BELL, who did knowingly and designedly, by a false or
23 fraudulent representation or pretense, obtain money, labor or real and personal property by fraud
24 from RENEW FUNDING, SPECIFICALLY, \$139,958, FOR 5141 GENESTA, which had a value
25 exceeding nine hundred fifty dollars (\$950).

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COUNT 33

MONEY LAUNDERING (Re: Andrew A.)

On or about and between June 28, 2017, and July 24, 2017, in the COUNTY of LOS ANGELES, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, LILIT MALYAN, GRIGOR TATOIAN, ROSA ZARATE, ESTEPHANIE REYNOSO, LUBIA CARRILLO, and VANESSA RAY BELL, who did unlawfully conduct transactions involving monetary instruments of a value exceeding \$25,000, through a financial institution knowing that the monetary instruments represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit: \$165,900 TOTAL THROUGH AT LEAST EIGHT TRANSACTIONS AS DETAILED IN THE TABLE BELOW. It is further alleged, pursuant to Penal Code section 186.10(c)(1)(B), that the value of the transaction or transactions exceeds one hundred fifty thousand dollars (\$150,000) but is less than one million dollars (\$1,000,000).

DATE	AMOUNT	TRANSACTION
6/30/17	\$44,000	U.S. Bank -2662 check to Bank of America -6898
7/1/17	\$20,000	U.S. Bank -2662 check to Bank of America -9473
7/3/17	\$26,000	U.S. Bank -2662 check to Bank of America -6898
7/5/17	\$1,200	U.S. Bank -2662 check to Bank of America -6898
7/10/17	\$48,700	U.S. Bank -2662 check to Bank of America -9418
7/21/17	\$1,000	U.S. Bank -2662 check to Bank of America -6898
7/24/17	\$5,000	U.S. Bank -2662 check to Bank of America -4999
7/24/17	\$20,000	U.S. Bank -2662 check to Bank of America -6898

COUNT 34

UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Sarkis B.)

On or about August 15, 2017, in the COUNTY of LOS ANGELES, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA

1 DADYAN, RICHARD AYVAZIAN, ARTUR AYVAZIAN, LILIT MALYAN, GRIGOR
2 TATOIAN, ROSA ZARATE, ESTEPHANIE REYNOSO, LUBIA CARRILLO, and VANESSA
3 RAY BELL, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey
4 the personal identifying information of another person, to wit: SARKIS B.'S NAME FOR A
5 YGRENE ENERGY FUND COMPLETION CERTIFICATE FOR 7106 JELICO.

6 **COUNT 35**

7 **GRAND THEFT (Re: Andrew A.)**

8 On or about and between July 25, 2017, and August 15, 2017, in the COUNTY of LOS
9 ANGELES, the crime of GRAND THEFT in violation of Penal Code section 487(a), a felony, was
10 committed by TAMARA DADYAN, RICHARD AYVAZIAN, ARTUR AYVAZIAN, LILIT
11 MALYAN, GRIGOR TATOIAN, ROSA ZARATE, ESTEPHANIE REYNOSO, LUBIA
12 CARRILLO, and VANESSA RAY BELL, who did knowingly and designedly, by a false or
13 fraudulent representation or pretense, obtain money, labor or real and personal property by fraud
14 from YGRENE ENERGY FUND, SPECIFICALLY, \$73,200, FOR 7106 JELICO, which had a
15 value exceeding nine hundred fifty dollars (\$950).

16 **COUNT 36**

17 **MONEY LAUNDERING (Re: Andrew A.)**

18 On or about and between August 1, 2017, and August 16, 2017, in the COUNTY of LOS
19 ANGELES, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a
20 felony, was committed by TAMARA DADYAN, RICHARD AYVAZIAN, ARTUR
21 AYVAZIAN, LILIT MALYAN, GRIGOR TATOIAN, ROSA ZARATE, ESTEPHANIE
22 REYNOSO, LUBIA CARRILLO, and VANESSA RAY BELL, who did unlawfully conduct
23 transactions involving monetary instruments of a value exceeding \$25,000, through a financial
24 institution knowing that the monetary instruments represented the proceeds of, and was derived
25 directly or indirectly from the proceeds of, criminal activity, to wit: \$80,000 TOTAL THROUGH
26 AT LEAST FOUR TRANSACTIONS AS DETAILED IN THE TABLE BELOW. It is further
27 alleged, pursuant to Penal Code section 186.10(c)(1)(A), that the value of the transaction or
28

1 transactions exceeds fifty thousand dollars (\$50,000) but is less than one hundred fifty thousand
2 dollars (\$150,000).

3 DATE	AMOUNT	TRANSACTION
4 8/1/17	\$20,000	U.S. Bank -2662 check to Bank of America -6898
5 8/15/17	\$10,000	U.S. Bank -2662 check to Bank of America -4999
6 8/15/17	\$30,000	U.S. Bank -2662 check to Bank of America -6898
7 8/16/17	\$20,000	U.S. Bank -2662 check to Bank of America -9473

8
9 **COUNT 37**

10 **UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Sarkis B.)**

11 On or about August 29, 2017, in the COUNTY of LOS ANGELES, the crime of IDENTITY
12 THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA
13 DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, LILIT MALYAN, GRIGOR
14 TATOIAN, ROSA ZARATE, ESTEPHANIE REYNOSO, LUBIA CARRILLO, and VANESSA
15 RAY BELL, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey
16 the personal identifying information of another person, to wit: SARKIS B.'S NAME FOR A
17 YGRENE ENERGY FUND COMPLETION CERTIFICATE FOR 8150 DAY.

18 **COUNT 38**

19 **GRAND THEFT (Re: Andrew A.)**

20 On or about and between August 7, 2017, and September 6, 2017, in the COUNTY of LOS
21 ANGELES, the crime of GRAND THEFT in violation of Penal Code section 487(a), a felony, was
22 committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, LILIT
23 MALYAN, GRIGOR TATOIAN, ROSA ZARATE, ESTEPHANIE REYNOSO, LUBIA
24 CARRILLO, and VANESSA RAY BELL, who did knowingly and designedly, by a false or
25 fraudulent representation or pretense, obtain money, labor or real and personal property by fraud
26 from YGRENE ENERGY FUND, SPECIFICALLY, \$86,400, FOR 8150 DAY, which had a value
27 exceeding nine hundred fifty dollars (\$950).

28 //

COUNT 39

CONSPIRACY TO COMMIT GRAND THEFT (Re: Liudmyla K.)

On or about and between June 16, 2015, and February 4, 2020, in the COUNTY of LOS ANGELES, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, LILIT MALYAN, ARTASHES MARTIROSYAN, GRIGOR TATOIAN, ARSHAK BARTOUMIAN, ROSA ZARATE, ESTEPHANIE REYNOSO, and VANESSA RAY BELL, who did willfully and unlawfully conspire together with another person or persons whose identity is known or unknown to commit the crime of GRAND THEFT BY FALSE PRETENSES, 487(a), of the California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

OVERT ACT 1

On or about June 16, 2015, Richard AYVAZYAN, Rosa ZARATE, and ESTEPHANIE REYNOSO, created a Yahoo email address with the user name "lkdesign15" using the name of "Liudmyla K."

OVERT ACT 2

On or about August 31, 2015, Tamara DADYAN created a Residential Purchase Agreement using Liudmyla K.'s name for the property located at 2162 Rohner Avenue in Simi Valley.

OVERT ACT 3

On or about October 9, 2015, Vanessa BELL created an Evidence of Insurance document using the name of Liudmyla K. for the property located 2162 Rohner Avenue in Simi Valley.

OVERT ACT 4

On or about October 16, 2015, Tamara DADYAN used Liudmyla K.'s name to obtain a \$535,128 loan from the Banc of California for the property located 2162 Rohner Avenue in Simi Valley.

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1 OVERT ACT 5

2 On or about October 20, 2016, Tamara DADYAN used Liudmyla K.'s name on a Deed of
3 Trust for a \$635,500 loan from the Banc of California for the property located at 11633 Spy Glass
4 Drive in Northridge.

5 OVERT ACT 6

6 On or about October 21, 2016, Tamara DADYAN emailed Richard AYVAZYAN images of
7 a driver's license and social security card in Liudmyla K.'s name.

8 OVERT ACT 7

9 On or about November 1, 2016, Rosa ZARATE deposited \$6,451.92 and withdrew \$900 via
10 ATM from a U.S. Bank account ending in -6908 in the name of Liudmyla K.

11 OVERT ACT 8

12 On or about November 28, 2016, Tamara DADYAN emailed Lilit MALYAN documents for
13 the \$653,500 loan from the Banc of California for the property located at 11633 Spy Glass Drive
14 in Northridge, in the name of Liudmyla K., and stated, "Keep this docs payment due your house
15 dec 1 remind me."

16 OVERT ACT 9

17 On or about December 14, 2016, Tamara DADYAN used Liudmyla K.'s name on a Deed of
18 Trust for a \$604,000 loan from the Banc of California for the property located at 8400 Natalie Lane
19 in West Hills.

20 OVERT ACT 10

21 On or about December 29, 2016, Tamara DADYAN used Liudmyla K.'s name to open a U.S.
22 Bank account ending in -2506, doing business as "Canon Builders."

23 OVERT ACT 11

24 On or about January 12, 2017, Tamara DADYAN emailed Richard AYVAZYAN a credit
25 report in Liudmyla K.'s name linked to 11633 Spy Glass Drive in Northridge, California.

26 OVERT ACT 12

27 On or about January 20, 2017, Tamara DADYAN used Liudmyla K.'s name on a Grant Deed
28 transferring the property at 11633 Spy Glass Drive in Northridge to Lilit MALYAN.

1 OVERT ACT 13

2 On or about February 9, 2017, Richard AYVAZYAN, Estephanie REYNOSO, and ROSA
3 ZARATE submitted a Ygrene Energy Fund completion certificate in the name of Liudmyla K. and
4 Aida M., in the amount of \$74,300, for 8400 Natalie Lane in West Hills.

5 OVERT ACT 14

6 On or about February 17, 2017, Richard AYVAZYAN, Estephanie REYNOSO, and ROSA
7 ZARATE submitted a Renew Funding completion certificate in the name of Liudmyla K. and Aida
8 M., in the amount of \$88,550, for 8400 Natalie Lane in West Hills.

9 OVERT ACT 15

10 On or about March 14, 2017, Artur AYVAZYAN filed a bankruptcy petition in Liudmyla
11 K.'s name in the Central District of California in Case No. 17-10641-MT.

12 OVERT ACT 16

13 On or about May 4, 2017, Richard AYVAZYAN, Estephanie REYNOSO, and ROSA
14 ZARATE submitted a Renew Funding completion certificate in the name of Liudmyla K., in the
15 amount of \$81,360, for 2162 Rohner Avenue in Simi Valley.

16 OVERT ACT 17

17 On or about September 3, 2017, Tamara DADYAN emailed Richard AYVAZYAN with the
18 subject, "Roghner sold grant deed if u need to send to cal first," and attached a Grant Deed
19 transferring the property at 2162 Rohner Avenue in Simi Valley from Liudmyla K. to Naira A.

20 OVERT ACT 18

21 On or about October 10, 2017, Arshak BARTOUMIAN emailed Tamara DADYAN with the
22 subject, "BK WAS DISMISSED ON THE CASE MATEO I GUESS SO THAT MAY BE THE
23 PROBLEM WE NEED A NEW ONE CARLOS IS A BK WE HAVE BUT THIS PROPERTY
24 NOT IN IT," and attached a faxed document regarding bankruptcies filed in the names of Liudmyla
25 K. and Mateo J.

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1 OVERT ACT 19

2 On or about July 24, 2018, Tamara DADYAN emailed Romana Cias with the subject "Sign
3 copy for [Liudmyla K.] sign the package u got in the mail they keep calling from the mortgage they
4 need that back" and attached an image of a handwritten signature.

5 OVERT ACT 20

6 On or about January 25, 2019, Tamara DADYAN emailed Lilit MALYAN and wrote, "I
7 send another email for a bofa girl can you email her this tell her to open business acc for canon
8 builders," attaching the Fictitious Business Name Statement for Canon Builders that was filed in
9 Liudmyla K.'s name.

10 COUNT 40

11 UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Liudmyla K.)

12 On or about May 4, 2017, in the COUNTY of LOS ANGELES, the crime of IDENTITY
13 THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA
14 DADYAN, RICHARD AYVAZIAN, ARTUR AYVAZIAN, LILIT MALYAN, ARTASHES
15 MARTIROSYAN, GRIGOR TATOIAN, ROSA ZARATE, ESTEPHANIE REYNOSO, LUBIA
16 CARRILLO, and VANESSA RAY BELL, who did willfully and unlawfully with the intent to
17 defraud sell, transfer, or convey the personal identifying information of another person, to wit:
18 LIUDMYLA K.'S NAME ON A RENEW FUNDING COMPLETION CERTIFICATE FOR 2162
19 ROHNER IN SIMI VALLEY.

20 COUNT 41

21 UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION

22 (Re: Liudmyla K. & Erwin N.)

23 On or about September 3, 2017, in the COUNTY of LOS ANGELES, the crime of
24 IDENTITY THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by
25 TAMARA DADYAN, RICHARD AYVAZIAN, ARTUR AYVAZIAN, LILIT MALYAN,
26 ARTASHES MARTIROSYAN, GRIGOR TATOIAN, ROSA ZARATE, ESTEPHANIE
27 REYNOSO, and VANESSA RAY BELL, who did willfully and unlawfully with the intent to
28 defraud sell, transfer, or convey the personal identifying information of another person, to wit:

LIUDMYLA K.'S NAME, AND ERWIN N.'S NAME AND NOTARY STAMP ON A GRANT DEED FOR 2162 ROHNER AVENUE IN SIMI VALLEY FROM LIUDMYLA K. TO NAIRA A.

COUNT 42

UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION

(Re: Liudmyla K. & Roy D.)

On or about February 4, 2020, in the COUNTY of LOS ANGELES, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZIAN, ARTUR AYVAZIAN, LILIT MALYAN, ARTASHES MARTIROSYAN, GRIGOR TATOIAN, ARSHAK BARTOUMIAN, ROSA ZARATE, ESTEPHANIE REYNOSO, and VANESSA RAY BELL, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey the personal identifying information of another person, to wit: LIUDMYLA K.'S NAME AND ROY D.'S NAME ON LOS ANGELES COUNTY RECORDED DOCUMENT NO. 20200139370.

COUNT 43

FORGERY RELATING TO IDENTITY THEFT (Re: Roy D.)

On or about February 4, 2020, in the COUNTY of LOS ANGELES, the crime of FORGERY in violation of Penal Code section 470(b), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZIAN, ARTUR AYVAZIAN, LILIT MALYAN, ARTASHES MARTIROSYAN, GRIGOR TATOIAN, ARSHAK BARTOUMIAN, ROSA ZARATE, ESTEPHANIE REYNOSO, and VANESSA RAY BELL, who with the intent to defraud, counterfeited and/or forged the seal or handwriting of another in or on LOS ANGELES COUNTY RECORDED DOCUMENT NO. 20200139370 IN THE NAME OF ROY D. Furthermore, the Defendants are charged in COUNT 42 with identity theft, as defined in Penal Code section 530.5.

COUNT 44

PROCURING OR OFFERING FALSE OR FORGED INSTRUMENT (Re: Liudmyla K.)

On or about February 4, 2020, in the COUNTY of LOS ANGELES, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT in violation of Penal

1 Code section 115(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN,
2 ARTUR AYVAZYAN, LILIT MALYAN, ARTASHES MARTIROSYAN, GRIGOR TATOIAN,
3 ARSHAK BARTOUMIAN, ROSA ZARATE, ESTEPHANIE REYNOSO, and VANESSA RAY
4 BELL, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed,
5 registered, or recorded in a public office in California, which instrument, if genuine, might be filed,
6 registered, or recorded under a law of California or the United States, to wit: LOS ANGELES
7 COUNTY RECORDED DOCUMENT NO. 20200139370.

8 **COUNT 45**

9 **CONSPIRACY TO COMMIT GRAND THEFT (Re: Susanna M.)**

10 On or about and between June 1, 2016, and October 1, 2019, in the COUNTY of LOS
11 ANGELES, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony,
12 was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN,
13 ROSA ZARATE, ESTEPHANIE REYNOSO, and VANESSA RAY BELL, who did willfully and
14 unlawfully conspire together with another person or persons whose identity is known or unknown
15 to commit the crime of GRAND THEFT BY FALSE PRETENSES, 487(a), of the California Penal
16 Code, a felony, pursuant to and for the purpose of carrying out the objects and purposes of the
17 aforesaid conspiracy, Defendants committed the following overt act(s):

18 **OVERT ACT 1**

19 On or about June 9, 2016, Richard AYVAZYAN and Estephanie REYNOSO created the
20 Yahoo account, "Susanna644," using Susanna M.'s name.

21 **OVERT ACT 2**

22 On or about August 5, 2016, Richard AYVAZYAN used the "Susanna644" Yahoo account
23 to register an internet domain in the name of "FiberOneMedia."

24 **OVERT ACT 3**

25 On or about September 6, 2016, Richard AYVAZYAN used the "Susanna644" Yahoo
26 account to create an email account in the name of "Osbaldo V." linked to the internet domain of
27 "FiberOneMedia."

28 //

1 OVERT ACT 4

2 On or about September 6, 2016, Richard AYVAZYAN used a Bank of America account
3 ending in -0559, held in Susanna M.'s name, to order checks shipped to 22615 Mariano St. in
4 Woodland Hills.

5 OVERT ACT 5

6 On or about November 16, 2016, Tamara DADYAN emailed Richard AYVAZYAN and
7 attached paystubs for Susanna's purported employment through "Fiber One Media."

8 OVERT ACT 6

9 On or about January 10, 2017, Richard AYVAZYAN used the "Susanna644" Yahoo account
10 to send financial documents in Susanna M.'s name to a Bourns Employee Federal Credit Union
11 (EFCU) representative, including statements for the Bank of America account ending in -0559 that
12 showed the balance inflated by \$56,756.96.

13 OVERT ACT 7

14 On or about January 20, 2017, Richard AYVAZYAN used Susanna M.'s name to obtain a
15 \$513,000 loan from Bourns FCU for the property located at 8937 Haskell.

16 OVERT ACT 8

17 On or about February 8, 2017, Richard AYVAZYAN used Anthony A.'s name to email
18 Tamara DADYAN with the subject, "Need A Favor," writing, "Can you ask Romana to fix this
19 Hud. I want the loan amount to be 413,000 instead of 513,000," and attached a Buyer's Final
20 Settlement Statement in Susanna M.'s name for the 8937 Haskell property that showed a \$513,000
21 trust deed from Bourns EFCU.

22 OVERT ACT 9

23 On or about February 9, 2017, Tamara DADYAN emailed Richard AYVAZYAN with the
24 subject, "See if good," and attached a Buyer's Final Settlement Statement in Susanna M.'s name
25 that showed a \$413,000 trust deed from Bourns EFCU.

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1 OVERT ACT 10

2 On or about March 29, 2017, Richard AYVAZYAN, Tamara DADYAN, and Artur
3 AYVAZYAN used Susanna M.'s name on a grant deed for the property located at 5141 Genesta in
4 Encino, California, where Richard AYVAZYAN lived.

5 OVERT ACT 11

6 On or about April 24, 2017, Richard AYVAZYAN used the "Susanna644" Yahoo account
7 to send a U.S. Bank representative images of a driver's license in Susanna M.'s name as well as a
8 utility bill in her name.

9 OVERT ACT 12

10 On or about July 13, 2017, Richard AYVAZYAN used Susanna M.'s name to obtain a
11 \$1,500,000 loan from East West Bank for the 5141 Genesta property.

12 OVERT ACT 13

13 On or about August 2, 2017, Richard AYVAZYAN, Estephanie REYNOSO, and Rosa
14 ZARATE deposited a \$3,500 check from the U.S. Bank account ending in -3701, held in Susanna
15 M.'s name, to the Bank of America account ending in -9473, held in Susanna M.'s name as DBA
16 Fiber One Media.

17 OVERT ACT 14

18 On or about August 16, 2017, Richard AYVAZYAN, Estephanie REYNOSO, and Rosa
19 ZARATE deposited a \$20,000 check from the U.S. Bank account ending in -2662, held in Andrew
20 A.'s name DBA SAVS Enterprise, to the Bank of America account ending in -9473, held in Susanna
21 M.'s name as DBA Fiber One Media.

22 OVERT ACT 15

23 On or about August 17, 2017, Richard AYVAZYAN, Estephanie REYNOSO, and Rosa
24 ZARATE used a Bank of America account ending in -9473, held in Susanna M.'s name doing
25 business as "Fiber One Media," to transfer \$20,000 to the Bank of America account ending in -
26 0559, held in Susanna M.'s name.

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28 //

1 OVERT ACT 16

2 On or about August 17, 2017, Richard AYVAZYAN, Estephanie REYNOSO, and Rosa
3 ZARATE used the Bank of America account ending in -0559, held in Susanna M.'s name, to
4 transfer \$2,000 to a bank account held in the name of Richard AYVAZYAN's wife, Marietta Ter-
5 Abelian.

6 OVERT ACT 17

7 On or about August 24, 2017, Richard AYVAZYAN, Rosa ZARATE, and Estephanie
8 REYNOSO used the Bank of America account ending in -0559, held in Susanna M.'s name, to
9 transfer \$3,500 to a bank account held in the name of Richard AYVAZYAN's wife, Marietta Ter-
10 Abelian.

11 OVERT ACT 18

12 On or about September 17, 2018, Richard AYVAZYAN used the Bank of America account
13 ending in -0559 held in Susanna M.'s name to obtain \$273,343.39 in proceeds from the purported
14 sale of AYVAZYAN's home located at 5141 Genesta Avenue in Encino.

15 COUNT 46

16 MORTGAGE FRAUD (Re: Susanna M.)

17 On or about and between March 29, 2017, and July 31, 2017, in the COUNTY of LOS
18 ANGELES, the crime of MORTGAGE FRAUD in violation of Penal Code section 532f(a)(2), a
19 felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR
20 AYVAZYAN, ROSA ZARATE, ESTEPHANIE REYNOSO, and VANESSA RAY BELL, who
21 did unlawfully and deliberately use or facilitate the use of a misstatement, misrepresentation, or
22 omission, with the knowledge it contained a misstatement, misrepresentation, or omission, during
23 the mortgage lending process, with the intention that it be relied upon by a mortgage lender,
24 borrower, or other party to the mortgage lending process, to wit: EAST WEST BANK. It is further
25 alleged, pursuant to Penal Code section 532f(j), that the value of the fraud exceeds \$950.

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COUNT 47

23

UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Susanna M.)

On or about July 13, 2017, in the COUNTY of LOS ANGELES, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, ROSA ZARATE, ESTEPHANIE REYNOSO, and VANESSA RAY BELL, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey the personal identifying information of another person, to wit: SUSANNA M.'S NAME ON AN EAST WEST BANK DEED OF TRUST FOR 5141 GENESTA, RECORDED DOCUMENT NO. 20170862745.

COUNT 48

23

MONEY LAUNDERING (Re: Susanna M.)

On or about and between August 16, 2017, and August 17, 2017, in the COUNTY of LOS ANGELES, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, ROSA ZARATE, ESTEPHANIE REYNOSO, and VANESSA RAY BELL, who did unlawfully conduct transactions involving monetary instruments of a value exceeding \$5,000, within a seven-day period, through a financial institution knowing that the monetary instruments represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit: \$20,000 FROM U.S. BANK ACCOUNT ENDING IN -2662 TO BANK OF AMERICA ACCOUNT ENDING IN -9473 TO BANK OF AMERICA ACCOUNT ENDING IN -0559, AS DETAILED IN THE TABLE BELOW:

DATE	AMOUNT	TRANSACTION
8/16/17	\$20,000	U.S. Bank -2662 check to Bank of America -9473
8/17/17	\$20,000	Bank of America -9473 transfer to Bank of America -0559

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COUNT 49

13

CONSPIRACY TO COMMIT GRAND THEFT (Re: Fatima J.)

On or about and between May 19, 2016, and December 13, 2018, in the COUNTY of LOS ANGELES, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was committed by TAMARA DADYAN, RICHARD AYVAZIAN, GRIGOR TATOIAN, ANDRANIK PETROSYAN, LILIT MALYAN, ARTASHES MARTIROSYAN, LUBIA CARRILLO, ARSHAK BARTOUMIAN, ROSA ZARATE, ESTEPHANIE REYNOSO, and VANESSA RAY BELL, who did willfully and unlawfully conspire together with another person or persons whose identity is known or unknown to commit the crime of GRAND THEFT BY FALSE PRETENSES, 487(a), of the California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

OVERT ACT 1

On or about May 19, 2016, Tamara DADYAN emailed Andranik PETROSYAN with the subject, "Your offer," and attached a purchase agreement in the name of Fatima J., offering \$1.4 million for the property located at 12334 Longacre Avenue in Granada Hills.

OVERT ACT 2

On or about May 20, 2016, Andranik PETROSYAN emailed the purchase agreement from Tamara DADYAN to the agent representing the sellers of the 12334 Longacre property.

OVERT ACT 3

On or about June 15, 2016, Tamara DADYAN emailed Andranik PETROSYAN and a Banc of California representative, attaching paystubs in the name of "Fatima J." that were purportedly from "Urban Solutions Services LLC."

OVERT ACT 4

On or about July 26, 2016, Tamara DADYAN emailed Lilit MALYAN with the subject "Need to do this [sic] transcripts" and attached a tax return in the name of Fatima J. that included her social security number.

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1 OVERT ACT 5

2 On or about August 23, 2016, Vanessa BELL emailed a Tower Escrow officer and attached
3 an Evidence of Insurance document in the name of Fatima J.

4 OVERT ACT 6

5 On or about September 7, 2016, Tamara DADYAN used Fatima J.'s name and the notary
6 stamp of Jon B. on a Deed of Trust for a \$1,099,000.00 loan from the Banc of California for the
7 property located at 12334 Longacre Ave. in Granada Hills.

8 OVERT ACT 7

9 On or about September 28, 2016, Tamara DADYAN used Fatima J.'s name and the notary
10 stamp of Erwin N. on a Deed of Trust for a \$170,000.00 loan from Bodega S&L for the property
11 located at 12334 Longacre Avenue in Granada Hills.

12 OVERT ACT 8

13 On or about October 20, 2016, Tamara DADYAN emailed Andranik PETROSYAN and
14 attached an image of a driver's license in the name of Fatima J. that included her date of birth.

15 OVERT ACT 9

16 On or about December 11, 2016, Tamara DADYAN emailed Richard AYVAZYAN with the
17 subject "Don't forget apply for his too" and attached the Real Estate Purchase Agreement in Fatima
18 J.'s name from the Banc of California loan for 12334 Longacre.

19 OVERT ACT 10

20 On or about January 11, 2017, Tamara DADYAN forwarded Lilit MALYAN an email with
21 Fatima J.'s Banc of California loan documents attached and wrote, "This is the property she now
22 owns see if we can get that loan that we're trying to get that Arus gets but first look at the credit
23 let's see."

24 OVERT ACT 11

25 On or about January 26, 2017, Estephanie REYNOSO used Fatima J.'s name to create a
26 Yahoo email account.

27 //

28 //

1 OVERT ACT 12

2 On or about February 3, 2017, Richard AYVAZIAN used the Fatima J. Yahoo account to
3 apply for funding from Renew Funding.

4 OVERT ACT 13

5 On or about February 3, 2017, Richard AYVAZIAN emailed Tamara DADYAN with the
6 subject "Fatima Approval" and included a screenshot of the Renew Funding application.

7 OVERT ACT 14

8 On or about March 8, 2017, Richard AYVAZIAN submitted a Renew Funding completion
9 certificate in the name of Fatima J., in the amount of \$131,700, for the property at 12334
10 Longacre Avenue in Granada Hills.

11 OVERT ACT 15

12 On or about April 18, 2017, Tamara DADYAN emailed Richard AYVAZIAN with the
13 subject, "Pending that I remember," and a list of names and streets, including Longacre.

14 OVERT ACT 16

15 On or about May 8, 2017, Richard AYVAZIAN, Estephanie REYNOSO, and Rosa
16 ZARATE submitted a Ygrene Energy Fund completion certificate in the name of Fatima J., in the
17 amount of \$113,625, for the property at 12334 Longacre Avenue in Granada Hills.

18 OVERT ACT 17

19 On or about July 14, 2017, Tamara DADYAN used Fatima J.'s name on a Deed of Trust for
20 a \$149,000 loan from the Valdez Family Trust for the property located at 12334 Longacre in
21 Granada Hills, California.

22 OVERT ACT 18

23 On or about March 25, 2018, Tamara DADYAN emailed Andranik PETROSYAN with the
24 subject "Need to get dl ss with karine pic for ur house" and attached an image of a driver's license
25 in the name of Fatima J. and a social security card in her name.

26 //

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1 OVERT ACT 19

2 On or about June 8, 2018, Lubia CARRILLO emailed Tamara DADYAN with the subject,
3 "LONGACRE FORECLOSURE," attaching a Notice of Trustee's Sale requested by Dennis
4 Valdez.

5 OVERT ACT 20

6 On or about June 13, 2018, Tamara DADYAN emailed Arshak BARTOUMIAN with the
7 subject "Long acre deed of trust I put trustee as your legal firm," attaching a purported Deed of
8 Trust with Fatima J. as the trustor, "Legal Works, Etc" as the trustee, and Larissa K. as the
9 beneficiary, to which BARTOUMIAN replied, "Ok."

10 OVERT ACT 21

11 On or about June 14, 2018, Tamara DADYAN emailed Arshak BARTOUMIAN a copy of a
12 Trustee's Deed Upon Sale for Dennis Valdez as to the 12334 Longacre property, writing "Save this
13 till I call u."

14 OVERT ACT 22

15 On or about June 14, 2018, Tamara DADYAN emailed Lubia CARRILLO and Golie
16 Ghoreishi, attached the Deed of Trust purportedly signed by Fatima J. and told Ghoreishi to email
17 the attachments to CARRILLO and ask for her help with getting payoff information.

18 OVERT ACT 23

19 On or about June 29, 2018, Tamara DADYAN emailed Artashes MARTIROSYAN with the
20 subject, "Stamp goes on page 2 dates need to match date there," and DADYAN attached the Deed
21 of Trust with Fatima J.'s purported signature.

22 OVERT ACT 24

23 On or about July 17, 2018, Andranik PETROSYAN emailed Tamara DADYAN with the
24 subject "Longacre" and attached an image of an unlawful detainer (eviction) action brought by the
25 Valdez Family Trust.

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1 OVERT ACT 25

2 On or about July 27, 2018, Grigor TATOIAN emailed Tamara DADYAN a motion to strike
3 complaint for unlawful detainer with Andranik PETROSYAN's name for the 12334 Longacre
4 property.

5 OVERT ACT 26

6 On or about July 31, 2018, Grigor TATOIAN emailed Tamara DADYAN with the subject
7 "Longacre" and said, "You call and tell him if he shows up to change the locks tomorrow tenant
8 will call the cops. Theres no judgment against tenant for a lockout. He should fuck off with his
9 locksmith."

10 OVERT ACT 27

11 On or about August 5, 2018, Grigor TATOIAN emailed Tamara DADYAN with the subject,
12 "Rescission for Ando," and attached a purported "Notice of Rescission" as to the Dennis Valdez
13 Trustee's Deed Upon Sale for the 12334 Longacre property that was filed on June 6, 2018.

14 OVERT ACT 28

15 On or about November 27, 2018, Grigor TATOIAN emailed Andranik PETROSYAN a court
16 complaint prepared using Fatima J.'s name as plaintiff regarding the Valdez Family Trust loan for
17 the 12334 Longacre property.

18 OVERT ACT 29

19 On or about December 13, 2018, Grigor TATOIAN emailed Tamara DADYAN, "I served
20 Dennis today the law suit. Lol," and attached a picture of a man holding a manila envelope.

21 COUNT 50

22 UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Fatima J.)

23 On or about May 8, 2017, in the COUNTY of LOS ANGELES, the crime of IDENTITY
24 THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA
25 DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, LILIT MALYAN, GRIGOR
26 TATOIAN, ROSA ZARATE, ESTEPHANIE REYNOSO, LUBIA CARRILLO, and VANESSA
27 RAY BELL, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey
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1 the personal identifying information of another person, to wit: FATIMA J.'S NAME ON A
2 YGRENE ENERGY FUND COMPLETION CERTIFICATE FOR 12334 LONGACRE.

3 **COUNT 51**

4 **MORTGAGE FRAUD (Re: Fatima J.)**

5 On or about and between June 12, 2017, and July 14, 2017, in the COUNTY of LOS
6 ANGELES, the crime of MORTGAGE FRAUD in violation of Penal Code section 532f(a)(2), a
7 felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ANDRANIK
8 PETROSYAN, LILIT MALYAN, ARTASHES MARTIROSYAN, ARSHAK BARTOUMIAN,
9 ROSA ZARATE, LUBIA CARRILLO, ESTEPHANIE REYNOSO, and VANESSA RAY BELL,
10 who did unlawfully and deliberately use or facilitate the use of a misstatement, misrepresentation,
11 or omission, with the knowledge it contained a misstatement, misrepresentation, or omission,
12 during the mortgage lending process, with the intention that it be relied upon by a mortgage lender,
13 borrower, or other party to the mortgage lending process, to wit: THE VALDEZ FAMILY TRUST.
14 It is further alleged, pursuant to Penal Code section 532f(j), that the value of the fraud exceeds
15 \$950.

16 **COUNT 52**

17 **GRAND THEFT (Re: Fatima J.)**

18 On or about and between June 12, 2017, and July 14, 2017, in the COUNTY of LOS
19 ANGELES, the crime of GRAND THEFT in violation of Penal Code section 487(a), a felony, was
20 committed by TAMARA DADYAN, RICHARD AYVAZYAN, ANDRANIK PETROSYAN,
21 LILIT MALYAN, ARTASHES MARTIROSYAN, ARSHAK BARTOUMIAN, ROSA ZARATE,
22 LUBIA CARRILLO, ESTEPHANIE REYNOSO, and VANESSA RAY BELL, who did
23 knowingly and designedly, by a false or fraudulent representation or pretense, obtain money, or
24 real property by fraud from THE VALDEZ FAMILY TRUST, SPECIFICALLY, A \$149,000
25 LOAN FOR 12334 LONGACRE AVENUE, which had a value exceeding nine hundred fifty
26 dollars (\$950).

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COUNT 53

123

UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION

(Re: Fatima J. & Erwin N.)

On or about July 24, 2017, in the COUNTY of LOS ANGELES, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZIAN, ANDRANIK PETROSYAN, LILIT MALYAN, ARTASHES MARTIROSYAN, ARSHAK BARTOUMIAN, ROSA ZARATE, LUBIA CARRILLO, ESTEPHANIE REYNOSO, and VANESSA RAY BELL, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey the personal identifying information of another person, to wit: FATIMA J.'S NAME AND ERWIN N.'S NAME ON A LOS ANGELES COUNTY RECORDED DOCUMENT NO. 20170826251, DEED OF TRUST.

COUNT 54

123

FORGERY RELATING TO IDENTITY THEFT (Re: Fatima J.)

On or about July 14, 2017, in the COUNTY of LOS ANGELES, the crime of FORGERY in violation of Penal Code section 470(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZIAN, ANDRANIK PETROSYAN, LILIT MALYAN, ARTASHES MARTIROSYAN, ARSHAK BARTOUMIAN, ROSA ZARATE, LUBIA CARRILLO, ESTEPHANIE REYNOSO, and VANESSA RAY BELL, who with the intent to defraud, signed the name of another person or of a fictitious person to convey any real property, specifically RECORDED DOCUMENT NO. 20170826251, DEED OF TRUST IN THE NAME OF FATIMA J., knowing that they had no authority to do so. Furthermore, the Defendants are charged in COUNT 53 with Identity Theft, as defined in Penal Code section 530.5.

COUNT 55

123

FORGERY RELATING TO IDENTITY THEFT (Re: Erwin N.)

On or about July 24, 2017, in the COUNTY of LOS ANGELES, the crime of FORGERY in violation of Penal Code section 470(b), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZIAN, ANDRANIK PETROSYAN, LILIT MALYAN, ARTASHES MARTIROSYAN, ARSHAK BARTOUMIAN, ROSA ZARATE, LUBIA CARRILLO,

1 ESTEPHANIE REYNOSO, and VANESSA RAY BELL, who with the intent to defraud,
2 counterfeited and/or forged the seal or handwriting of another in or on a RECORDED
3 DOCUMENT NO. 20170826251, DEED OF TRUST. Furthermore, the Defendants are charged in
4 COUNT 53 with identity theft, as defined in Penal Code section 530.5.

5 **COUNT 56**

6 **PROCURING OR OFFERING FALSE OR FORGED INSTRUMENT (Re: Fatima J.)**

7 On or about July 24, 2017, in the COUNTY of LOS ANGELES, the crime of PROCURING
8 OR OFFERING A FALSE OR FORGED INSTRUMENT in violation of Penal Code section
9 115(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZIAN,
10 ANDRANIK PETROSYAN, LILIT MALYAN, ARTASHES MARTIROSYAN, ARSHAK
11 BARTOUMIAN, ROSA ZARATE, LUBIA CARRILLO, ESTEPHANIE REYNOSO, and
12 VANESSA RAY BELL, who did unlawfully and knowingly procure or offer a false or forged
13 instrument to be filed, registered, or recorded in a public office in California, which instrument, if
14 genuine, might be filed, registered, or recorded under a law of California or the United States, to
15 wit: RECORDED DOCUMENT NO. 20170826251, DEED OF TRUST.

16 **COUNT 57**

17 **MORTGAGE FRAUD EXCEEDING \$950: FILING A FRAUDULENT DOCUMENT**

18 **(Re: Fatima J.)**

19 On or about July 24, 2017, in the COUNTY of LOS ANGELES, the crime of FILING A
20 FRAUDULENT DOCUMENT in violation of Penal Code section 532f(a)(4), a felony, was
21 committed by TAMARA DADYAN, RICHARD AYVAZIAN, ANDRANIK PETROSYAN,
22 LILIT MALYAN, ARTASHES MARTIROSYAN, ARSHAK BARTOUMIAN, ROSA ZARATE,
23 LUBIA CARRILLO, ESTEPHANIE REYNOSO, and VANESSA RAY BELL, who did with the
24 intent to defraud, file or cause to be filed with the recorder of any county in connection with a
25 mortgage loan transaction, a document with the knowledge the document contains a deliberate
26 misstatement, misrepresentation, or omission, to wit: RECORDED DOCUMENT NO.
27 20170826251, DEED OF TRUST. It is further alleged that the value of the fraud exceeds nine
28 hundred fifty dollars (\$950), within the meaning of Penal Code section 532f(j).

COUNT 58

UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION

(Re: Fatima J. & Silver D.V.)

On or about July 27, 2018, in the COUNTY of LOS ANGELES, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZIAN, GRIGOR TATOIAN, ANDRANIK PETROSYAN, LILIT MALYAN, ARTASHES MARTIROSYAN, ARSHAK BARTOUMIAN, ROSA ZARATE, LUBIA CARRILLO, ESTEPHANIE REYNOSO, and VANESSA RAY BELL, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey the personal identifying information of another person, to wit: THE NAMES OF FATIMA J. AND SILVER D.V. ON RECORDED DOCUMENT NO. 20180756418, NOTICE OF RESCISSION.

COUNT 59

FORGERY RELATING TO IDENTITY THEFT (Re: Silver D.V.)

On or about July 27, 2018, in the COUNTY of LOS ANGELES, the crime of FORGERY in violation of Penal Code section 470(b), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZIAN, GRIGOR TATOIAN, ANDRANIK PETROSYAN, LILIT MALYAN, ARTASHES MARTIROSYAN, ARSHAK BARTOUMIAN, ROSA ZARATE, LUBIA CARRILLO, ESTEPHANIE REYNOSO, and VANESSA RAY BELL, who with the intent to defraud, counterfeited and/or forged the seal or handwriting of another in or on RECORDED DOCUMENT NO. 20180756418, NOTICE OF RESCISSION in the name of Silver D.V. Furthermore, the Defendants are charged in COUNT 58 with identity theft, as defined in Penal Code section 530.5.

COUNT 60

PROCURING OR OFFERING FALSE OR FORGED INSTRUMENT (Re: Fatima J.)

On or about July 27, 2018, in the COUNTY of LOS ANGELES, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZIAN, GRIGOR TATOIAN, ANDRANIK PETROSYAN, LILIT MALYAN, ARTASHES MARTIROSYAN,

1 ARSHAK BARTOUMIAN, ROSA ZARATE, LUBIA CARRILLO, ESTEPHANIE REYNOSO,
2 and VANESSA RAY BELL, who did unlawfully and knowingly procure or offer a false or forged
3 instrument to be filed, registered, or recorded in a public office in California, which instrument, if
4 genuine, might be filed, registered, or recorded under a law of California or the United States, to
5 wit: RECORDED DOCUMENT NO. 20180756418, NOTICE OF RESCISSION.

6 **COUNT 61**

7 **CONSPIRACY TO COMMIT GRAND THEFT (Re: Walter C.)**

8 On or about and between December 2, 2016, and September 26, 2019, in the COUNTY of
9 LOS ANGELES, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a
10 felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, LILIT MALYAN,
11 LUBIA CARRILLO, ESTEPHANIE REYNOSO, and ROSA ZARATE who did willfully and
12 unlawfully conspire together with another person or persons whose identity is known or unknown
13 to commit the crime of GRAND THEFT BY FALSE PRETENSES, 487(a), of the California Penal
14 Code, a felony, pursuant to and for the purpose of carrying out the objects and purposes of the
15 aforesaid conspiracy, Defendants committed the following overt act(s):

16 **OVERT ACT 1**

17 On or about December 2, 2016, Lubia CARRILLO submitted a Residential Purchase
18 Agreement in the name of Walter C. to Caliber Home Loans for a loan on the property located at
19 15821 Kingsbury Street in Granada Hills.

20 **OVERT ACT 2**

21 On or about December 29, 2016, Tamara DADYAN emailed Richard AYVAZYAN with the
22 subject "Walter dl" and attached an image of a driver's license in the name of Walter C.

23 **OVERT ACT 3**

24 On or about March 3, 2017, Tamara DADYAN used Walter C.'s name and the notary stamp
25 of Carolyn S. on a Deed of Trust for a \$525,309 loan from Caliber Home Loans for the property at
26 15821 Kingsbury Street in Granada Hills.

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1 OVERT ACT 4

2 On or about March 21, 2017, Tamara DADYAN emailed Richard AYVAZYAN a closing
3 disclosure and stated, "Look befor u send out I can have romana fix the downpayment to show
4 more equity."

5 OVERT ACT 5

6 On or about April 18, 2017, Tamara DADYAN emailed Richard AYVAZYAN a list of
7 pending deals, including, "Walter kingsbury."

8 OVERT ACT 6

9 On or about May 8, 2017, Richard AYVAZYAN, Estephanie REYNOSO, and Rosa
10 ZARATE created a Gmail account using Walter C.'s name.

11 OVERT ACT 7

12 On or about May 8, 2017, Tamara DADYAN emailed Richard AYVAZYAN, copying a
13 different Gmail account in Walter C.'s name, and stated, "This is Walters email comes to my
14 phone."

15 OVERT ACT 8

16 On or about May 8, 2017, Tamara DADYAN emailed Richard AYVAZYAN a loan
17 application in the name of Walter C. for 15821 Kingsbury Street in Granada Hills and stated, "Here
18 is the 1003 but don't put his phone number on this 1003 put any other one."

19 OVERT ACT 9

20 On or about May 26, 2017, Tamara DADYAN emailed Richard AYVAZYAN a paystub and
21 W-2 purportedly from SAVS Enterprise in the name of Walter C.

22 OVERT ACT 10

23 On or about June 8, 2017, Richard AYVAZYAN, Estephanie REYNOSO, and Rosa
24 ZARATE submitted a Ygrene Energy Fund completion certificate in the name of Walter C., in the
25 amount of \$47,000, for 15821 Kingsbury Street in Granada Hills.

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1 OVERT ACT 11

2 On or about June 22, 2017, Richard AYVAZIAN, Estephanie REYNOSO, and Rosa
3 ZARATE submitted a Renew Funding completion certificate in the name of Walter C., in the
4 amount of \$53,500, for 15821 Kingsbury Street in Granada Hills.

5 OVERT ACT 12

6 On or about May 2, 2018, Tamara DADYAN emailed Lubia CARRILLO statements from a
7 Chase account ending in -9688 that was held in Walter C.'s name.

8 OVERT ACT 13

9 On or about May 4, 2018, Tamara DADYAN emailed Lubia CARRILLO Caliber Home Loan
10 documents, an earning statement, and a Form W-2 in the name of Walter C.

11 OVERT ACT 14

12 On or about May 14, 2018, Lubia CARRILLO emailed Tamara DADYAN, with the subject,
13 "walter updated stmt april," and stated, "Thank you. I submitted the package on line. Let's see
14 what happens."

15 OVERT ACT 15

16 On or about June 8, 2018, Lubia CARRILLO emailed Tamara DADYAN with the subject,
17 "Walter," and said, "Can I please get May bank statement."

18 OVERT ACT 16

19 On or about June 9, 2018, Tamara DADYAN forwarded Lubia CARRILLO's bank statement
20 request to Lilit MALYAN.

21 OVERT ACT 17

22 On or about September 26, 2019, Lubia CARRILLO filed a bankruptcy petition in Walter
23 C.'s name in the Central District of California in Case No. 19-12427-MT

24 COUNT 62

25 UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Walter C.)

26 On or about June 27, 2017, in the COUNTY of LOS ANGELES, the crime of IDENTITY
27 THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA
28 DADYAN, RICHARD AYVAZIAN, LILIT MALYAN, LUBIA CARRILLO, ESTEPHANIE

1 REYNOSO, and ROSA ZARATE, who did willfully and unlawfully with the intent to defraud sell,
2 transfer, or convey the personal identifying information of another person, to wit: WALTER C.'S
3 NAME FOR A YGRENE ENERGY FUND COMPLETION CERTIFICATE FOR 15821
4 KINGSBURY IN GRANADA HILLS.

5 COUNT 63

6 **UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Walter C.)**

7 On or about September 26, 2019, in the COUNTY of LOS ANGELES, the crime of
8 IDENTITY THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by
9 TAMARA DADYAN, RICHARD AYVAZIAN, LILIT MALYAN, LUBIA CARRILLO,
10 ESTEPHANIE REYNOSO, and ROSA ZARATE, who did willfully and unlawfully with the intent
11 to defraud sell, transfer, or convey the personal identifying information of another person, to wit:
12 WALTER C.'S NAME ON A DEBTOR'S PETITION IN CENTRAL DISTRICT OF
13 CALIFORNIA CASE NO. 19-12427-MT.

14 COUNT 64

15 **PROCURING OR OFFERING FALSE OR FORGED INSTRUMENT (Re: Walter C.)**

16 On or about September 26, 2019, in the COUNTY of LOS ANGELES, the crime of
17 PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT in violation of Penal
18 Code section 115(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZIAN,
19 LILIT MALYAN, LUBIA CARRILLO, ESTEPHANIE REYNOSO, and ROSA ZARATE, who
20 did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered,
21 or recorded in a public office in California, which instrument, if genuine, might be filed, registered,
22 or recorded under a law of California or the United States, to wit: DEBTOR'S PETITION IN
23 CENTRAL DISTRICT OF CALIFORNIA CASE NO. 19-12427-MT.

24 COUNT 65

25 **CONSPIRACY TO COMMIT GRAND THEFT (Re: Osbaldo V.)**

26 On or about and between December 14, 2016, and April 11, 2019, in the COUNTY of LOS
27 ANGELES, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1), a felony,
28 was committed by TAMARA DADYAN, RICHARD AYVAZIAN, ARTUR AYVAZIAN,

1 GRIGOR TATOIAN, ARTASHES MARTIROSYAN, ARSHAK BARTOUMIAN,
2 ESTEPHANIE REYNOSO, ROSA ZARATE, and ANDRANIK PETROSYAN, who did willfully
3 and unlawfully conspire together with another person or persons whose identity is known or
4 unknown to commit the crime of GRAND THEFT BY FALSE PRETENSES, 487(a), of the
5 California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects and
6 purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

7 OVERT ACT 1

8 On or about December 14, 2016, Richard AYVAZYAN emailed Tamara DADYAN with the
9 subject, "Co sign for Osbaldo," and included the information of Rogelio V. and Sava Enterprise.

10 OVERT ACT 2

11 On or about December 21, 2016, Tamara DADYAN, using Osbaldo V.'s name, emailed
12 Richard AYVAZYAN with the subject, "Copy of ID," and attached an image of a driver's license
13 in the name of Osbaldo V.

14 OVERT ACT 3

15 On or about December 28, 2016, Richard AYVAZYAN emailed Artur AYVAZYAN an
16 image of a driver's license in the name of Osbaldo V.

17 OVERT ACT 4

18 On or about January 25, 2017, Tamara DADYAN emailed Andranik PETROSYAN images
19 of a driver's license and social security card in the name of Osbaldo V., and asked, "Can u see if u
20 can open a bofa or wells or chase[?]"

21 OVERT ACT 5

22 On or about January 30, 2017, Tamara DADYAN emailed Grigor TATOIAN an image of a
23 social security card in the name of Osbaldo V., with the subject, "Osbaldo ssi use same address
24 Wells Fargo personal acc please," and exchanged a conversation about the account.

25 OVERT ACT 6

26 On or about April 19, 2017, Richard AYVAZYAN emailed Tamara DADYAN a Fiber One
27 Media letter confirming Osbaldo V. as a Chief Operations Officer, with a salary of \$420,000, and
28 stated, "Steph wanted this letter on the company letterhead. Here you go..."

1 OVERT ACT 7

2 On or about November 8, 2017, Tamara DADYAN faxed herself Form W-2's and a Form
3 1040 from Fiber One Media in the name of Osbaldo V.

4 OVERT ACT 8

5 On or about November 23, 2017, Razmik Galoosian faxed Tamara DADYAN payroll
6 statements from Fiber One Media in the name of Osbaldo V.

7 OVERT ACT 9

8 On or about December 5, 2017, Artashes MARTIROSYAN emailed Tamara DADYAN
9 images of a driver's license and debit card in the name of Osbaldo V. with the subject, "Osbaldo
10 V," and spoke about rent payments, deposits, and tax returns related to Osbaldo V.

11 OVERT ACT 10

12 On or about March 20, 2018, Tamara DADYAN emailed Andranik PETROSYAN, with the
13 subject, "Rojellio 1003," and attached a loan application for the property located at 5141 Genesta
14 Avenue, Encino, California in the name of Osbaldo V.

15 OVERT ACT 11

16 On or about April 9, 2018, Artashes MARTIROSYAN emailed Tamara DADYAN an
17 Attorney Certification containing the name of Osbaldo V., with the subject line, "Osbaldo," and
18 stated, "Corrected name."

19 OVERT ACT 12

20 On or about April 22, 2018, Grigor TATOIAN emailed Tamara DADYAN, with the subject,
21 "University RPA," and attached a Residential Purchase Agreement for the property at 931
22 University Avenue, Burbank, California in the name of Osbaldo V.

23 OVERT ACT 13

24 On or about April 30, 2018, Tamara DADYAN responded to an email that asked about re-
25 applying to the HERO Program.

26 OVERT ACT 14

27 On or about May 3, 2018, Artashes MARTIROSYAN emailed Tamara DADYAN with the
28 subject, "Extensions," and attached a Form 4868 request for extension to file a tax return in the

1 name and social security number of Osbaldo V.

2 OVERT ACT 15

3 On or about May 11, 2018, Artur AYVAZIAN paid for a SiriusXM subscription using a
4 debit card in the name of Osbaldo V.

5 OVERT ACT 16

6 On or about June 13, 2018, Artashes MARTIROSYAN emailed Tamara DADYAN with the
7 subject, "Osbaldo 2017 W2," and attached a Form W-2 in the name and social security number of
8 Osbaldo V.

9 OVERT ACT 17

10 On or about June 14, 2018, Tamara DADYAN emailed Artashes MARTIROSYAN Wells
11 Fargo bank statements in the name of Osbaldo V., and stated, "I need this to give to Todd for
12 longacre but we also need to give it to philip for university."

13 OVERT ACT 18

14 On or about June 19, 2018, Artashes MARTIROSYAN emailed Tamara DADYAN Wells
15 Fargo bank statements in the name of Osbaldo V., with the subject, "Osbaldo University."

16 OVERT ACT 19

17 On or about June 26, 2018, Tamara DADYAN emailed herself Letters of Explanations in the
18 name, date of birth, and social security number of Osbaldo V., and reminded herself, "You need to
19 re send her the transcripts for 2016 and the payroll checks."

20 OVERT ACT 20

21 On or about June 29, 2018, Tamara DADYAN emailed lending and escrow agents an
22 addendum for the property at 931 University Avenue, Burbank, California, indicating that the
23 buyer, Osbaldo V., and the seller agreed to "drop the purchase price to \$1,100,000."

24 OVERT ACT 21

25 On or about July 6, 2018, Grigor TATOIAN emailed Tamara DADYAN with the subject,
26 "Rent from Moso," and attached an image of a Cashier's Check in the name of Osbaldo V.

27 OVERT ACT 22

28 On or about July 10, 2018, Tamara DADYAN emailed a lender with the subject, "Here u go

1 babe,” and attached a request for verification of rent in the name of Osbaldo V.

2 OVERT ACT 23

3 On or about July 18, 2018, Artashes MARTIROSYAN emailed Tamara DADYAN, with the
4 subject, “Osbaldo,” and attached a Consumer Explanation Letter in the name of Osbaldo V. for
5 Supreme Lending.

6 OVERT ACT 24

7 On or about August 1, 2018, in response to a lender asking about Osbaldo V.’s disconnected
8 business and cellphone numbers, Artashes MARTIROSYAN, posing as Osbaldo V., stated, “I have
9 no idea what your talking about Todd. . . . What’s seems to be the problem?? You clearly can see
10 both myself and escrow and Tammy are here in our end to complete this loan process.”

11 OVERT ACT 25

12 On or about August 17, 2018, Tamara DADYAN emailed Artashes MARTIROSYAN, with
13 the subject, “My phone died I didn’t pay my bill,” and stated, “Art can u login to mykailo wells
14 [a]nd osbaldo wells[.] We need to make westhore [p]ayment.”

15 OVERT ACT 26

16 On or about December 10, 2018, Tamara DADYAN emailed Grigor TATOIAN an image of
17 a blank Wells Fargo check in the name of Osbaldo V.

18 COUNT 66



19 **UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Osbaldo V.)**

20 On or about December 5, 2017, in the COUNTY of LOS ANGELES, the crime of IDENTITY
21 THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA
22 DADYAN, RICHARD AYVAZIAN, ARTUR AYVAZIAN, GRIGOR TATOIAN,
23 ARTASHES MARTIROSYAN, ESTEPHANIE REYNOSO, ROSA ZARATE, and ANDRANIK
24 PETROSYAN, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey
25 the personal identifying information of another person, to wit: DRIVER’S LICENSE AND DEBIT
26 CARD IN OSBALDO V.’S NAME.

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COUNT 67

MORTGAGE FRAUD (Re: Osbaldo V.)

On or about and between March 20, 2018, and July 23, 2018, in the COUNTY of LOS ANGELES, the crime of MORTGAGE FRAUD in violation of Penal Code section 532f(a)(2), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, GRIGOR TATOIAN, ARTASHES MARTIROSYAN, ESTEPHANIE REYNOSO, ROSA ZARATE, and ANDRANIK PETROSYAN, who did unlawfully and deliberately use or facilitate the use of a misstatement, misrepresentation, or omission, with the knowledge it contained a misstatement, misrepresentation, or omission, during the mortgage lending process, with the intention that it be relied upon by a mortgage lender, borrower, or other party to the mortgage lending process, to wit: SUPREME LENDING. It is further alleged, pursuant to Penal Code section 532f(j), that the value of the fraud exceeds \$950.

COUNT 68

UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Osbaldo V.)

On or about March 20, 2018, in the COUNTY of LOS ANGELES, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, GRIGOR TATOIAN, ARTASHES MARTIROSYAN, ESTEPHANIE REYNOSO, ROSA ZARATE, and ANDRANIK PETROSYAN, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey the personal identifying information of another person, to wit: A LOAN APPLICATION IN THE NAME AND SOCIAL SECURITY NUMBER OF OSBALDO V.

COUNT 69

UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Osbaldo V.)

On or about April 22, 2018, in the COUNTY of LOS ANGELES, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, GRIGOR TATOIAN, ARTASHES MARTIROSYAN, ESTEPHANIE REYNOSO, ROSA ZARATE, and ANDRANIK PETROSYAN, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey

1 the personal identifying information of another person, to wit: A RESIDENTIAL PURCHASE
2 AGREEMENT IN THE NAME OF OSBALDO V.

3 **COUNT 70**

4 **FORGERY RELATING TO IDENTITY THEFT (Re: Osbaldo V.)**

5 On or about April 22, 2018, in the COUNTY of LOS ANGELES, the crime of FORGERY
6 in violation of Penal Code section 470(a), a felony, was committed by TAMARA DADYAN,
7 RICHARD AYVAZIAN, ARTUR AYVAZIAN, GRIGOR TATOIAN, ARTASHES
8 MARTIROSYAN, ESTEPHANIE REYNOSO, ROSA ZARATE, and ANDRANIK
9 PETROSYAN N, who with the intent to defraud, signed the name of another person or of a fictitious
10 person to A CONTRACT IN THE NAME OF OSBALDO V., SPECIFICALLY A RESIDENTIAL
11 PURCHASE AGREEMENT, knowing that they had no authority to do so. Furthermore, the
12 Defendants are charged in COUNT 69 with identity theft, as defined in Penal Code section 530.5.

13 **COUNT 71**

14 **UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Osbaldo V.)**

15 On or about June 13, 2018, in the COUNTY of LOS ANGELES, the crime of IDENTITY
16 THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA
17 DADYAN, RICHARD AYVAZIAN, ARTUR AYVAZIAN, GRIGOR TATOIAN,
18 ARTASHES MARTIROSYAN, ARSHAK BARTOUMIAN, ESTEPHANIE REYNOSO, ROSA
19 ZARATE, and ANDRANIK PETROSYAN, who did willfully and unlawfully with the intent to
20 defraud sell, transfer, or convey the personal identifying information of another person, to wit:
21 FORM W-2 IN THE NAME AND SOCIAL SECURITY NUMBER OF OSBALDO V.

22 **COUNT 72**

23 **UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Osbaldo V.)**

24 On or about June 19, 2018, in the COUNTY of LOS ANGELES, the crime of IDENTITY
25 THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA
26 DADYAN, RICHARD AYVAZIAN, ARTUR AYVAZIAN, GRIGOR TATOIAN,
27 ARTASHES MARTIROSYAN, ARSHAK BARTOUMIAN, ESTEPHANIE REYNOSO, ROSA
28 ZARATE, and ANDRANIK PETROSYAN, who did willfully and unlawfully with the intent to

defraud sell, transfer, or convey the personal identifying information of another person, to wit:
WELLS FARGO BANK STATEMENTS ENDING IN -0950 IN OSBALDO V.'S NAME.

COUNT 73

UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Osbaldo V.)

On or about June 29, 2018, in the COUNTY of LOS ANGELES, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZIAN, ARTUR AYVAZIAN, GRIGOR TATOIAN, ARTASHES MARTIROSYAN, ARSHAK BARTOUMIAN, ESTEPHANIE REYNOSO, ROSA ZARATE, and ANDRANIK PETROSYAN, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey the personal identifying information of another person, to wit: ADDENDUM TO A RESIDENTIAL PURCHASE AGREEMENT IN OSBALDO V.'S NAME.

COUNT 74

UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Osbaldo V.)

On or about July 10, 2018, in the COUNTY of LOS ANGELES, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZIAN, ARTUR AYVAZIAN, GRIGOR TATOIAN, ARTASHES MARTIROSYAN, ARSHAK BARTOUMIAN, ESTEPHANIE REYNOSO, ROSA ZARATE, and ANDRANIK PETROSYAN, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey the personal identifying information of another person, to wit: REQUEST FOR VERIFICATION OF RENT IN OSBALDO V.'S NAME.

COUNT 75

UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Osbaldo V.)

On or about July 18, 2018, in the COUNTY of LOS ANGELES, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZIAN, ARTUR AYVAZIAN, GRIGOR TATOIAN, ARTASHES MARTIROSYAN, ARSHAK BARTOUMIAN, ESTEPHANIE REYNOSO, ROSA ZARATE, and ANDRANIK PETROSYAN, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey the personal identifying information of another person, to wit:

1 CONSUMER EXPLANATION LETTER IN OSBALDO V.'S NAME.

2 **COUNT 76**

3 **UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Elizabeth W.)**

4 On or about July 23, 2018, in the COUNTY of LOS ANGELES, the crime of IDENTITY
5 THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA
6 DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, GRIGOR TATOIAN,
7 ARTASHES MARTIROSYAN, ARSHAK BARTOUMIAN, ESTEPHANIE REYNOSO, ROSA
8 ZARATE, and ANDRANIK PETROSYAN, who did willfully and unlawfully with the intent to
9 defraud sell, transfer, or convey the personal identifying information of another person, to wit:
10 RECORDED DOCUMENT NO. 2018073049, ORDER EXPUNGING NOTICE OF PENDENCY
11 IN THE NAME OF ELIZABETH W.

12 **COUNT 77**

13 **FORGERY RELATING TO IDENTITY THEFT (Re: Elizabeth W.)**

14 On or about July 23, 2018, in the COUNTY of LOS ANGELES, the crime of FORGERY in
15 violation of Penal Code section 470(b), a felony, was committed by TAMARA DADYAN,
16 RICHARD AYVAZYAN, ARTUR AYVAZYAN, GRIGOR TATOIAN, ARTASHES
17 MARTIROSYAN, ARSHAK BARTOUMIAN, ESTEPHANIE REYNOSO, ROSA ZARATE,
18 and ANDRANIK PETROSYAN, who with the intent to defraud, counterfeited and/or forged the
19 seal or handwriting of another in or on a RECORDED DOCUMENT NO. 2018073049, ORDER
20 EXPUNGING NOTICE OF PENDENCY IN THE NAME OF ELIZABETH W. Furthermore, the
21 Defendants are charged in COUNT 76 with identity theft, as defined in Penal Code section 530.5.

22 **COUNT 78**

23 **PROCURING OR OFFERING FALSE OR FORGED INSTRUMENT (Re: Elizabeth W.)**

24 On or about July 23, 2018, in the COUNTY of LOS ANGELES, the crime of PROCURING
25 OR OFFERING A FALSE OR FORGED INSTRUMENT in violation of Penal Code section
26 115(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR
27 AYVAZYAN, GRIGOR TATOIAN, ARTASHES MARTIROSYAN, ARSHAK
28 BARTOUMIAN, ESTEPHANIE REYNOSO, ROSA ZARATE, and ANDRANIK PETROSYAN,

1 who did unlawfully and knowingly procure or offer a false or forged instrument to be filed,
2 registered, or recorded in a public office in California, which instrument, if genuine, might be filed,
3 registered, or recorded under a law of California or the United States, to wit: RECORDED
4 DOCUMENT NO. 2018073049, ORDER EXPUNGING NOTICE OF PENDENCY.

5 **COUNT 79**

6 **UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Jean W. & Lori H.)**

7 On or about July 23, 2018, in the COUNTY of LOS ANGELES, the crime of IDENTITY
8 THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA
9 DADYAN, RICHARD AYVAZIAN, ARTUR AYVAZIAN, GRIGOR TATOIAN,
10 ARTASHES MARTIROSYAN, ARSHAK BARTOUMIAN, ESTEPHANIE REYNOSO, ROSA
11 ZARATE, and ANDRANIK PETROSYAN, who did willfully and unlawfully with the intent to
12 defraud sell, transfer, or convey the personal identifying information of another person, to wit:
13 RECORDED DOCUMENT NO. 2018073050, EXPUNGING PENDENCY OF ACTION IN THE
14 NAME OF JEAN W. AND LORI H.

15 **COUNT 80**

16 **FORGERY RELATING TO IDENTITY THEFT (Re: Jean W. & Lori H.)**

17 On or about July 23, 2018, in the COUNTY of LOS ANGELES, the crime of FORGERY in
18 violation of Penal Code section 470(a), a felony, was committed by TAMARA DADYAN,
19 RICHARD AYVAZIAN, ARTUR AYVAZIAN, GRIGOR TATOIAN, ARTASHES
20 MARTIROSYAN, ARSHAK BARTOUMIAN, ESTEPHANIE REYNOSO, ROSA ZARATE,
21 and ANDRANIK PETROSYAN, who with the intent to defraud, signed the name of another person
22 or of a fictitious person to a release or discharge of any suit or action in the name of Jean W. and
23 Lori H., specifically RECORDED DOCUMENT NO. 2018073050, EXPUNGING PENDENCY
24 OF ACTION IN THE NAME OF JEAN W. AND LORI H., knowing that they had no authority to
25 do so. Furthermore, the Defendants are charged in COUNT 79 with identity theft, as defined in
26 Penal Code section 530.5.

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COUNT 81

PROCURING OR OFFERING FALSE OR FORGED INSTRUMENT

(Re: Jean W. & Lori H.)

On or about July 23, 2018, in the COUNTY of LOS ANGELES, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZIAN, ARTUR AYVAZIAN, GRIGOR TATOIAN, ARTASHES MARTIROSYAN, ARSHAK BARTOUMIAN, ESTEPHANIE REYNOSO, ROSA ZARATE, and ANDRANIK PETROSYAN, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: RECORDED DOCUMENT NO. 2018073050, EXPUNGING PENDENCY OF ACTION IN THE NAME OF JEAN W. AND LORI H.

COUNT 82

GRAND THEFT (Re: Osbaldo V.)

On or about and between July 18, 2018, and July 23, 2018, in the COUNTY of LOS ANGELES, the crime of GRAND THEFT in violation of Penal Code section 487(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZIAN, ARTUR AYVAZIAN, GRIGOR TATOIAN, ARTASHES MARTIROSYAN, ARSHAK BARTOUMIAN, ESTEPHANIE REYNOSO, ROSA ZARATE, and ANDRANIK PETROSYAN, who did knowingly and designedly, by a false or fraudulent representation or pretense, obtain money by fraud from SUPREME LENDING, SPECIFICALLY \$990,000 FOR 931 UNIVERSITY AVENUE IN BURBANK, CALIFORNIA, which had a value exceeding nine hundred fifty dollars (\$950).

COUNT 83

PROCURING OR OFFERING FALSE OR FORGED INSTRUMENT (Re: Osbaldo V.)

On or about July 23, 2018, in the COUNTY of LOS ANGELES, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZIAN, ARTUR

1 AYVAZIAN, GRIGOR TATOIAN, ARTASHES MARTIROSYAN, ARSHAK
2 BARTOUMIAN, ESTEPHANIE REYNOSO, ROSA ZARATE, and ANDRANIK PETROSYAN,
3 who did unlawfully and knowingly procure or offer a false or forged instrument to be filed,
4 registered, or recorded in a public office in California, which instrument, if genuine, might be filed,
5 registered, or recorded under a law of California or the United States, to wit: RECORDED
6 DOCUMENT NO. 20180732053, DEED OF TRUST.

7 **COUNT 84**

8 **MORTGAGE FRAUD EXCEEDING \$950: FILING A FRAUDULENT DOCUMENT**

9 **(Re: Osbaldo V.)**

10 On or about July 23, 2018, in the COUNTY of LOS ANGELES, the crime of FILING A
11 FRAUDULENT DOCUMENT in violation of Penal Code section 532f(a)(4), a felony, was
12 committed by TAMARA DADYAN, RICHARD AYVAZIAN, ARTUR AYVAZIAN, GRIGOR
13 TATOIAN, ARTASHES MARTIROSYAN, ARSHAK BARTOUMIAN, ESTEPHANIE
14 REYNOSO, ROSA ZARATE, and ANDRANIK PETROSYAN who did with the intent to defraud,
15 file or cause to be filed with the recorder of any county in connection with a mortgage loan
16 transaction, a document with the knowledge the document contains a deliberate misstatement,
17 misrepresentation, or omission, to wit: RECORDED DOCUMENT NO. 20180732053, DEED OF
18 TRUST. It is further alleged that the value of the fraud exceeds nine hundred fifty dollars (\$950),
19 within the meaning of Penal Code section 532f(j).

20 **COUNT 85**

21 **CONSPIRACY TO COMMIT GRAND THEFT (Re: Rogelio V.)**

22 On or about and between April 4, 2016, and January 23, 2020, in the COUNTY of LOS
23 ANGELES, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony,
24 was committed by TAMARA DADYAN, RICHARD AYVAZIAN, ARTUR AYVAZIAN,
25 LILIT MALYAN, ARTASHES MARTIROSYAN, GRIGOR TATOIAN, ANDRANIK
26 PETROSYAN, ROSA ZARATE, and ESTEPHANIE REYNOSO, who did willfully and
27 unlawfully conspire together with another person or persons whose identity is known or unknown
28 to commit the crime of GRAND THEFT BY FALSE PRETENSES, 487(a), of the California Penal

Code, a felony, pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

OVERT ACT 1

On or about April 4, 2016, Tamara DADYAN emailed Victoria Akopyan with the subject, "Rojolio credit," and attached a credit report in the name of Rogelio V.

OVERT ACT 2

On or about July 21, 2016, Tamara DADYAN emailed Richard AYVAZYAN with the subject, "Did I give u this," and attached a credit report in the name of Rogelio V.

OVERT ACT 3

On or about September 16, 2016, Richard AYVAZYAN, Estephanie REYNOSO, and ROSA ZARATE created a Yahoo email account using the name of Rogelio V.

OVERT ACT 4

On or about October 7, 2016, Richard AYVAZYAN, Estephanie REYNOSO, and Rosa ZARATE opened a First Tech Federal Credit Union (FCU) account in the name of Rogelio V.

OVERT ACT 5

On or about December 5, 2016, Richard AYVAZYAN opened a U.S. Bank account in the name of Rogelio V.

OVERT ACT 6

On or about December 14, 2016, Richard AYVAZYAN emailed Tamara DADYAN Rogelio V.'s social security number and birthdate, asking Tamara DADYAN to have Razmik Galoosian "start the income docs" and to communicate with a Caliber Home Loans representative.

OVERT ACT 7

On or about December 14, 2016, Richard AYVAZYAN and Estephanie REYNOSO created the email address, "rog@savsenterprise.com" using Rogelio V.'s name.

OVERT ACT 8

On or about December 20, 2016, Tamara DADYAN emailed Richard AYVAZYAN tax forms in Rogelio V.'s name and told AYVAZYAN, "remind me to do the stolen identity paper for IRS for Walter oswaldo and rojolio it's a must rich."

1 OVERT ACT 9

2 On or about January 25, 2017, Tamara DADYAN emailed Lilit MALYAN with the subject,
3 "See if this is good," and attached W-2 statements and earning statements purportedly from SAVS
4 Enterprise in the name of Rogelio V.

5 OVERT ACT 10

6 On or about February 1, 2017, Richard AYVAZYAN, Estephanie REYNOSO, and Rosa
7 ZARATE deposited a \$2,500 check from the U.S. Bank account ending in -2662, held in the name
8 of SAVS Enterprise and Andrew A., to the First Tech FCU account held in Rogelio V.'s name.

9 OVERT ACT 11

10 On or about March 30, 2017, Richard AYVAZYAN emailed himself images of a driver's
11 license and social security card in the name of Rogelio V.

12 OVERT ACT 12

13 On or about July 20, 2017, Artur AYVAZYAN acted as Rogelio V. and signed a Deed of
14 Trust for a \$636,087 loan from Caliber Home Loans for the property located at 8150 Day Street in
15 Sunland, California.

16 OVERT ACT 13

17 On or about July 31, 2017, Tamara DADYAN emailed Richard AYVAZYAN and Artashes
18 MARTIROSYAN a copy of the Buyer/Borrower Statement for the 8150 Day loan in Rogelio V.'s
19 name.

20 OVERT ACT 14

21 On or about February 7, 2018, Estephanie REYNOSO used the Rogelio V. Yahoo account to
22 email an AJ Madison representative and attached a driver's license in the name of Rogelio V.

23 OVERT ACT 15

24 On or about March 20, 2018, Tamara DADYAN emailed Andranik PETROSYAN a credit
25 report in the name of Rogelio V.

26 OVERT ACT 16

27 On or about March 25, 2018, Tamara DADYAN emailed Andranik PETROSYAN a driver's
28 license and social security card in the name of Rogelio V.

1 OVERT ACT 17

2 On or about June 5, 2018, Tamara DADYAN emailed Greg TATOIAN a driver's license and
3 social security card in the name of Rogelio V.

4 OVERT ACT 18

5 On or about January 21, 2020, Tamara DADYAN and Artur AYVAZYAN exchanged drafts
6 of an amended complaint against Caliber Home Loans in the name of Rogelio V., which was
7 subsequently filed in Central District of California Case No. 2:19-cv-9897.

8 COUNT 86

9 UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Rogelio V.)

10 On or about June 5, 2017, in the COUNTY of LOS ANGELES, the crime of IDENTITY
11 THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA
12 DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, LILIT MALYAN, ARTASHES
13 MARTIROSYAN, ROSA ZARATE, and ESTEPHANIE REYNOSO, who did willfully and
14 unlawfully with the intent to defraud sell, transfer, or convey the personal identifying information
15 of another person, to wit: ROGELIO V.'S NAME THROUGH THE USE OF A U.S. BANK
16 ACCOUNT HELD IN HIS NAME.

17 COUNT 87

18 MORTGAGE FRAUD (Re: Rogelio V.)

19 On or about and between December 14, 2016, and July 31, 2017, in the COUNTY of LOS
20 ANGELES, the crime of MORTGAGE FRAUD in violation of Penal Code section 532f(a)(2), a
21 felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR
22 AYVAZYAN, LILIT MALYAN, ARTASHES MARTIROSYAN, GRIGOR TATOIAN, ROSA
23 ZARATE, and ESTEPHANIE REYNOSO, who did unlawfully and deliberately use or facilitate
24 the use of a misstatement, misrepresentation, or omission, with the knowledge it contained a
25 misstatement, misrepresentation, or omission, during the mortgage lending process, with the
26 intention that it be relied upon by a mortgage lender, borrower, or other party to the mortgage
27 lending process, to wit: CALIBER HOME LOANS. It is further alleged, pursuant to Penal Code
28 section 532f(j), that the value of the fraud exceeds \$950.

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COUNT 88

GRAND THEFT (Re: Rogelio V.)

On or about and between June 12, 2017, and July 31, 2017, in the COUNTY of LOS ANGELES, the crime of GRAND THEFT in violation of Penal Code section 487(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, LILIT MALYAN, ARTASHES MARTIROSYAN, GRIGOR TATOIAN, ROSA ZARATE, and ESTEPHANIE REYNOSO, who did knowingly and designedly, by a false or fraudulent representation or pretense, obtain money or real property by fraud from CALIBER HOME LOANS, SPECIFICALLY, A \$636,087 LOAN FOR 8150 DAY STREET IN SUNLAND, CALIFORNIA, which had a value exceeding nine hundred fifty dollars (\$950).

COUNT 89

UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Rogelio V.)

On or about June 20, 2017, in the COUNTY of LOS ANGELES, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, LILIT MALYAN, ARTASHES MARTIROSYAN, ROSA ZARATE, and ESTEPHANIE REYNOSO, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey the personal identifying information of another person, to wit: ROGELIO V.'S NAME, DEED OF TRUST, RECORDED DOCUMENT NO. 20170852148.

COUNT 90

FORGERY RELATING TO IDENTITY THEFT (Re: Rogelio V.)

On or about June 20, 2017, in the COUNTY of LOS ANGELES, the crime of FORGERY in violation of Penal Code section 470(b), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, LILIT MALYAN, ARTASHES MARTIROSYAN, ROSA ZARATE, and ESTEPHANIE REYNOSO, who with the intent to defraud, counterfeited or forged the seal or handwriting of another in or on DEED OF TRUST, RECORDED DOCUMENT NO. 20170852148. Furthermore, the Defendants are charged in COUNT 89 with identity theft, as defined in Penal Code section 530.5.

23

COUNT 91

PROCURING OR OFFERING FALSE OR FORGED INSTRUMENT (Re: Rogelio V.)

On or about June 20, 2017, in the COUNTY of LOS ANGELES, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, LILIT MALYAN, ARTASHES MARTIROSYAN, ROSA ZARATE, and ESTEPHANIE REYNOSO, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: DEED OF TRUST, RECORDED DOCUMENT NO. 20170852148.

23

COUNT 92

UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Rogelio V.)

On or about August 29, 2017, in the COUNTY of LOS ANGELES, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, LILIT MALYAN, ARTASHES MARTIROSYAN, GRIGOR TATOIAN, ROSA ZARATE, and ESTEPHANIE REYNOSO, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey the personal identifying information of another person, to wit: ROGELIO V.'S NAME FOR A YGRENE ENERGY FUND COMPLETION CERTIFICATE FOR 8150 DAY.

23

COUNT 93

UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Rogelio V.)

On or about February 7, 2018, in the COUNTY of LOS ANGELES, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, LILIT MALYAN, ARTASHES MARTIROSYAN, GRIGOR TATOIAN, ROSA ZARATE, and ESTEPHANIE REYNOSO, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey the personal identifying information of another person, to wit: ROGELIO V.'S NAME THROUGH THE USE OF A YAHOO ACCOUNT IN HIS NAME.

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COUNT 94

UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Rogelio V.)

On or about March 20, 2018, in the COUNTY of LOS ANGELES, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZIAN, ARTUR AYVAZIAN, ANDRANIK PETROSYAN, LILIT MALYAN, ARTASHES MARTIROSYAN, GRIGOR TATOIAN, ROSA ZARATE, and ESTEPHANIE REYNOSO, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey the personal identifying information of another person, to wit: ROGELIO V.'S NAME THROUGH THE TRANSFER OF CREDIT REPORT IN HIS NAME.

23

COUNT 95

UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Rogelio V.)

On or about March 25, 2018, in the COUNTY of LOS ANGELES, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZIAN, ARTUR AYVAZIAN, ANDRANIK PETROSYAN, LILIT MALYAN, ARTASHES MARTIROSYAN, GRIGOR TATOIAN, ROSA ZARATE, and ESTEPHANIE REYNOSO, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey the personal identifying information of another person, to wit: ROGELIO V.'S NAME THROUGH THE TRANSFER OF DRIVER'S LICENSE IN HIS NAME.

23

COUNT 96

UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Rogelio V.)

On or about June 5, 2018, in the COUNTY of LOS ANGELES, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZIAN, ARTUR AYVAZIAN, ANDRANIK PETROSYAN, LILIT MALYAN, ARTASHES MARTIROSYAN, GRIGOR TATOIAN, ROSA ZARATE, and ESTEPHANIE REYNOSO, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey the personal identifying information of another person, to wit: ROGELIO V.'S NAME THROUGH THE TRANSFER OF A DRIVER'S LICENSE IN HIS NAME.

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23
COUNT 97

UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Rogelio V.)

On or about January 23, 2020, in the COUNTY of LOS ANGELES, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, ANDRANIK PETROSYAN, LILIT MALYAN, ARTASHES MARTIROSYAN, GRIGOR TATOIAN, ROSA ZARATE, and ESTEPHANIE REYNOSO, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey the personal identifying information of another person, to wit: AMENDED COMPLAINT IN CENTRAL DISTRICT OF CALIFORNIA CASE NO. 2:19-CV-9897

23
COUNT 98

FORGERY RELATING TO IDENTITY THEFT (Re: Rogelio V.)

On or about January 23, 2020, in the COUNTY of LOS ANGELES, the crime of FORGERY in violation of Penal Code section 470(b), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, ANDRANIK PETROSYAN, LILIT MALYAN, ARTASHES MARTIROSYAN, ROSA ZARATE, and ESTEPHANIE REYNOSO, who with the intent to defraud, counterfeited or forged the seal or handwriting of another in or on AMENDED COMPLAINT IN CENTRAL DISTRICT OF CALIFORNIA CASE NO. 2:19-CV-9897. Furthermore, the Defendants are charged in COUNT 97 with identity theft, as defined in Penal Code section 530.5.

23
COUNT 99

PROCURING OR OFFERING FALSE OR FORGED INSTRUMENT (Re: Rogelio V.)

On or about January 23, 2020, in the COUNTY of LOS ANGELES, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, ANDRANIK PETROSYAN, LILIT MALYAN, ARTASHES MARTIROSYAN, GRIGOR TATOIAN, ROSA ZARATE, and ESTEPHANIE REYNOSO, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered,

1 or recorded under a law of California or the United States, to wit: AMENDED COMPLAINT IN
2 CENTRAL DISTRICT OF CALIFORNIA CASE NO. 2:19-CV-9897. 

3 **COUNT 100**

4 **CONSPIRACY TO COMMIT GRAND THEFT (Re: Melanva A.)**

5 On or about and between May 11, 2016 and December 20, 2019, in the COUNTY of LOS
6 ANGELES, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1), a felony,
7 was committed by TAMARA DADYAN, RICHARD AYVAZIAN, GRIGOR TATOIAN,
8 ARTASHES MARTIROSYAN, ARSHAK BARTOUMIAN, ESTEPHANIE REYNOSO, and
9 ROSA ZARATE, who did willfully and unlawfully conspire together with another person or
10 persons whose identity is known or unknown to commit the crime of GRAND THEFT BY FALSE
11 PRETENSES, 487(a), of the California Penal Code, a felony, pursuant to and for the purpose of
12 carrying out the objects and purposes of the aforesaid conspiracy, Defendants committed the
13 following overt act(s):

14 **OVERT ACT 1**

15 On or about May 11, 2016, Tamara DADYAN, posing as Melanya A., emailed Equity Fund
16 Financial, Inc. and stated "Here are the documents you requested," and attached a Wells Fargo bank
17 statement in the name of Melanya A., an image of a driver's license in the name of Melanya A.,
18 and an image of a social security number in the name of Melanya A.

19 **OVERT ACT 2**

20 On or about July 28, 2016, Tamara DADYAN emailed Grigor TATOIAN a 2016 Corporation
21 Estimated Tax and stated, "Can u do a Corp resolution ASAP for westlake please adding Melanya
22 a[.] and adeliya T[.] as both interest holders please say treasure and ceo something like that."

23 **OVERT ACT 3**

24 On or about July 28, 2016, Grigor TATOIAN replied to Tamara DADYAN's email regarding
25 the corporation resolution and asked, "Got it. Still using the same investors?"

26 **OVERT ACT 4**

27 On or about July 30, 2016, Grigor TATOIAN emailed Tamara DADYAN and attached a
28 "Corporate Resolution" listing Melanya A. as the director and secretary of Adeliya Timirova

1 Investments, Inc. in relation to the purchasing of 3520 Ridgeford Drive, Westlake Village,
2 California.

3 OVERT ACT 5

4 On or about September 6, 2016, Tamara DADYAN used Melanya A.'s name on a Grant Deed
5 transferring the property located at 3520 Ridgeford Drive, Westlake Village, California from AAA
6 Electronical Engineering, Inc. to Melanya A.

7 OVERT ACT 6

8 On or about September 9, 2016, Richard AYVAZYAN, Estephanie REYNOSO, and Rosa
9 ZARATE submitted a Ygrene Energy Fund completion certificate in the name of Melanya A. for
10 purported improvements to the property at 6556 Andasol Avenue, Van Nuys, California in the
11 amount of \$86,627.

12 OVERT ACT 7

13 On or about October 28, 2016, Richard AYVAZYAN, Estephanie REYNOSO, and Rosa
14 ZARATE submitted a Renew Funding completion certificate in the name of Melanya A. for
15 purported improvements to the property at 6556 Andasol Avenue in Van Nuys, California, in the
16 amount of \$47,356.

17 OVERT ACT 8

18 On or about December 11, 2016, Tamara DADYAN forwarded Richard AYVAZYAN an
19 email from Lubia CARRILLO with the subject, "a[.] loan docs," attached unsigned mortgage loan
20 documents in the name of Melanya A. and in the amount of \$800,000, for the property at 3520
21 Ridgeford Drive, Westlake Village, California, and stated, "Apply for this on a rush."

22 OVERT ACT 9

23 On or about February 2, 2017, Tamara DADYAN forwarded an email to Richard
24 AYVAZYAN with the subject, "Westlake melan Fwd: Ridgeford 1003," attached with a refinance
25 loan application containing Melanya A.'s name, date of birth, and social security number for the
26 property at 3520 Ridgeford Drive, Westlake Village, California 91361, and stated, "Her password
27 is Hopar1910 I get all her emails so u can give me heads up."

28 //

1 OVERT ACT 10

2 On or about March 20, 2017, Tamara DADYAN used Corrie S.'s name and notary stamp on
3 a Grant Deed transferring the property located at 6556 Andasol Avenue in Van Nuys, California
4 from Melanya A. to Andrew A., Trustee of the Andasol Family Trust.

5 OVERT ACT 11

6 On or about April 3, 2017, Tamara DADYAN emailed Richard AYVAZYAN with the
7 subject, "Keep in mind 6556 andasol is in her name only," and attached a credit report containing
8 Melanya A.'s name, date of birth, and social security number.

9 OVERT ACT 12

10 On or about April 7, 2017, Tamara DADYAN emailed Richard AYVAZYAN with the
11 subject, "A[,] Melanya DL And SSN," and attached images of a driver's license and a social
12 security number card in the name of Melanya A.

13 OVERT ACT 13

14 On or about April 18, 2017, Tamara DADYAN emailed Richard AYVAZYAN with the
15 subject, "Pending that I remember," and provided a list of pending deals, including "Melanya -
16 westlake."

17 OVERT ACT 14

18 On or about May 23, 2017, Richard AYVAZYAN, Estephanie REYNOSO, and Rosa
19 ZARATE submitted a Renew Funding completion certificate in the name of Melanya A. for
20 purported improvements to the property at 3520 Ridgeford Drive, Westlake Village, California in
21 the amount of \$144,200.

22 OVERT ACT 15

23 On or about November 1, 2017, Tamara DADYAN forwarded herself an email that was sent
24 from an escrow officer to a Mail.com email address in the name of Melanya A., requesting the
25 signature and completion of escrow documents in the name of Melanya A. for the property at 3520
26 Ridgeford Drive, Westlake Village, California, and a blank grant deed transferring the same
27 property from Melanya A. to Anna D.

28 //

1 OVERT ACT 16

2 On or about November 3, 2017, Grigor TATOIAN emailed Tamara DADYAN with the
3 subject, "Westlake NOD," and attached Notices of Default addressed to Melanya A. and for the
4 property at 3520 Ridgeford Drive, Westlake Village, California.

5 OVERT ACT 17

6 On or about November 27, 2017, Tamara DADYAN, posing as Melanya A., emailed Renew
7 Funding requesting transfer and release documents and attached a Notice of Assessment in the
8 name of Melanya A. for the property at 3520 Ridgeford Drive, Westlake Village, California.

9 OVERT ACT 18

10 On or about January 16, 2018, Artashes MARTIROSYAN emailed Tamara DADYAN
11 escrow and realty documents in the name of Melanya A. related to the sale of 3520 Ridgeford
12 Drive, Westlake Village, California, and stated, "For Ridgeford."

13 OVERT ACT 19

14 On or about January 17, 2018, Grigor TATOIAN emailed Tamara DADYAN with the
15 subject, "Received today Westlake," and attached a Motion for Relief from the Automatic Stay and
16 related documents for a bankruptcy case in the name of Melanya A.

17 OVERT ACT 20

18 On or about January 19, 2018, Tamara DADYAN forwarded the email from Grigor
19 TATOIAN regarding the Motion for Relief from the Automatic Stay to Arshak BARTOUMIAN
20 and asked, "What u think of this?"

21 OVERT ACT 21

22 On or about January 19, 2018, Arshak BARTOUMIAN replied to Tamara DADYAN's email
23 and stated, "Is it does the same thing that they filed already and sent over."

24 OVERT ACT 22

25 On or about January 24, 2018, Arshak BARTOUMIAN emailed Tamara DADYAN a
26 Bankruptcy Petition and a Notice of Dismissal in the name of Melanya A.

27 OVERT ACT 23

28 On or about January 26, 2018, Artashes MARTIROSYAN replied to Tamara DADYAN with

1 the subject, "Adamian – red'x.PDF," attached unsigned and not filed bankruptcy documents in the
2 name of Melanya A., and stated "ok here."

3 OVERT ACT 24

4 On or about January 29, 2018, Tamara DADYAN filed a Bankruptcy Petition in the name of
5 Melanya A.

6 OVERT ACT 25

7 On or about February 20, 2018, Artashes MARTIROSYAN emailed Tamara DADYAN with
8 the subject, "Ridgeford," and attached financial, realty, and escrow documents containing the
9 names and signatures of Melanya A. and Anna D.

10 OVERT ACT 26

11 On or about February 27, 2018, in response to Tamara DADYAN's email with the subject,
12 "Ridgeford," and stating, "Art u don't have January Wells Fargo," Artashes MARTIROSYAN
13 responded, "Sitting here for a week. Need to go over."

14 OVERT ACT 27

15 On or about March 20, 2018, Tamara DADYAN emailed Artashes MARTIROSYAN and
16 attached images of a driver's license and a social security number card in the name of Melanya A.

17 OVERT ACT 28

18 On or about March 23, 2018, Tamara DADYAN emailed escrow and lender officers with the
19 subject, "Here si q copy of the documents," and attached multiple documents containing Melanya
20 A.'s name, signatures, and initials.

21 OVERT ACT 29

22 On or about March 26, 2018, Tamara DADYAN emailed a lending group and a Mail.com
23 email address in the name of Melanya A., Renew Funding documents in the name and signature of
24 Melanya A., for 3520 Ridgeford Drive, Westlake Village, California, and stated, "This is what I
25 have the signed documents on ridgeford from seller."

26 OVERT ACT 30

27 On or about April 11, 2018, Tamara DADYAN emailed an escrow officer escrow documents
28 in the names and signatures of Melanya A. and Anna D., and for the property at 3520 Ridgeford

1 Drive, Westlake Village, California.

2 OVERT ACT 31

3 On or about April 11, 2018, Tamara DADYAN emailed Grigor TATOIAN a Short Form
4 Deed of Trust and Assignment of Rents in the name of Melanya A. and for the property at 3520
5 Ridgeford Drive, Westlake Village, California.

6 OVERT ACT 32

7 On or about June 7, 2018, Tamara DADYAN emailed Grigor TATOIAN a Trustee's Deed
8 Upon Sale for the sale of the property at 3520 Ridgeford Drive, Westlake Village, California, which
9 listed Melanya A. as the previous owner.

10 OVERT ACT 33

11 On or about March 21, 2019, Tamara DADYAN forwarded herself an email that she sent to
12 Renew Funding on November 28, 2017, posing as Melanya A., requesting transfer and release
13 documents attached with a Notice of Assessment in the name of Melanya A. for the property at
14 3520 Ridgeford Drive, Westlake Village, California.

15 OVERT ACT 34

16 On or about December 20, 2019, Tamara DADYAN used Adam S.'s name on a Grant Deed
17 transferring the property located at 3520 Ridgeford Drive, Westlake Village, California, from
18 Melanya A. to Anna D.

19 COUNT 101



20 **UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Melanya A.)**

21 On or about May 23, 2017, in the COUNTY of LOS ANGELES, the crime of IDENTITY
22 THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA
23 DADYAN, RICHARD AYVAZIAN, GRIGOR TATOIAN, ESTEPHANIE REYNOSO, and
24 ROSA ZARATE, who did willfully and unlawfully with the intent to defraud sell, transfer, or
25 convey the personal identifying information of another person, to wit: MELANYA A.'S NAME
26 ON A RENEW FUNDING COMPLETION CERTIFICATE FOR 3520 RIDGEFORD.

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COUNT 102

FORGERY RELATING TO IDENTITY THEFT (Re: Melanya A.)

On or about May 23, 2017, in the COUNTY of LOS ANGELES, the crime of FORGERY in violation of Penal Code section 470(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, GRIGOR TATOIAN, ESTEPHANIE REYNOSO, and ROSA ZARATE, who with the intent to defraud, signed the name of another person or of a fictitious person to A CONTRACT IN THE NAME OF MELANYA A., SPECIFICALLY A RENEW FUNDING COMPLETION CERTIFICATE, knowing that they had no authority to do so. Furthermore, the Defendants are charged in COUNT 101 with identity theft, as defined in Penal Code section 530.5.

COUNT 103

UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Melanya A.)

On or about December 1, 2017, in the COUNTY of LOS ANGELES, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, GRIGOR TATOIAN, ESTEPHANIE REYNOSO, and ROSA ZARATE, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey the personal identifying information of another person, to wit: BANKRUPTCY PETITION IN THE NAME OF MELANYA A.

COUNT 104

FORGERY RELATING TO IDENTITY THEFT (Re: Melanya A.)

On or about December 1, 2017, in the COUNTY of LOS ANGELES, the crime of FORGERY in violation of Penal Code section 470(b), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, GRIGOR TATOIAN, ESTEPHANIE REYNOSO, and ROSA ZARATE, who with the intent to defraud, counterfeited and/or forged the seal or handwriting of another in or on A BANKRUPTCY PETITION IN THE NAME OF MELANYA A. Furthermore, the Defendants are charged in COUNT 103 with identity theft, as defined in Penal Code section 530.5.

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COUNT 105

PROCURING OR OFFERING FALSE OR FORGED INSTRUMENT (Re: Melanya A.)

On or about December 1, 2017, in the COUNTY of LOS ANGELES, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, GRIGOR TATOIAN, ESTEPHANIE REYNOSO, and ROSA ZARATE, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: BANKRUPTCY PETITION IN THE NAME OF MELANYA A.

23

COUNT 106

UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Melanya A.)

On or about January 29, 2018, in the COUNTY of LOS ANGELES, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, GRIGOR TATOIAN, ARTASHES MARTIROSYAN, ARSHAK BARTOUMIAN, ESTEPHANIE REYNOSO, and ROSA ZARATE, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey the personal identifying information of another person, to wit: BANKRUPTCY PETITION IN THE NAME OF MELANYA A.

23

COUNT 107

FORGERY RELATING TO IDENTITY THEFT (Re: Melanya A.)

On or about January 29, 2018, in the COUNTY of LOS ANGELES, the crime of FORGERY in violation of Penal Code section 470(b), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, GRIGOR TATOIAN, ARTASHES MARTIROSYAN, ARSHAK BARTOUMIAN, ESTEPHANIE REYNOSO, and ROSA ZARATE, who with the intent to defraud, counterfeited and/or forged the seal or handwriting of another in or on a BANKRUPTCY PETITION IN THE NAME OF MELANYA A. Furthermore, the Defendants are charged in COUNT 106 with identity theft, as defined in Penal Code section 530.5.

23

COUNT 108

PROCURING OR OFFERING FALSE OR FORGED INSTRUMENT (Re: Melanya A.)

On or about January 29, 2018, in the COUNTY of LOS ANGELES, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZIAN, GRIGOR TATOIAN, ARTASHES MARTIROSYAN, ARSHAK BARTOUMIAN, ESTEPHANIE REYNOSO, and ROSA ZARATE, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: BANKRUPTCY PETITION IN THE NAME OF MELANYA A.

23

COUNT 109

UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Melanya A.)

On or about February 20, 2018, in the COUNTY of LOS ANGELES, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZIAN, GRIGOR TATOIAN, ARTASHES MARTIROSYAN, ARSHAK BARTOUMIAN, ESTEPHANIE REYNOSO, and ROSA ZARATE, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey the personal identifying information of another person, to wit: A RESIDENTIAL PURCHASE AGREEMENT IN THE NAME OF MELANYA A.

23

COUNT 110

FORGERY RELATING TO IDENTITY THEFT (Re: Melanya A.)

On or about February 20, 2018, in the COUNTY of LOS ANGELES, the crime of FORGERY in violation of Penal Code section 470(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZIAN, GRIGOR TATOIAN, ARTASHES MARTIROSYAN, ARSHAK BARTOUMIAN, ESTEPHANIE REYNOSO, and ROSA ZARATE, who with the intent to defraud, signed the name of another person or of a fictitious person to a contract to convey any real property, specifically A RESIDENTIAL PURCHASE AGREEMENT IN THE NAME OF MELANYA A., knowing that they had no authority to do so. Furthermore, the Defendants are

1 charged in COUNT 109 with identity theft, as defined in Penal Code section 530.5.

2 **COUNT 111**

3 **UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Melanva A.)**

4 On or about March 20, 2018, in the COUNTY of LOS ANGELES, the crime of IDENTITY
5 THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA
6 DADYAN, RICHARD AYVAZIAN, GRIGOR TATOIAN, ARTASHES MARTIROSYAN,
7 ARSHAK BARTOUMIAN, ESTEPHANIE REYNOSO, and ROSA ZARATE, who did willfully
8 and unlawfully with the intent to defraud sell, transfer, or convey the personal identifying
9 information of another person, to wit: A DRIVER'S LICENSE AND SOCIAL SECURITY CARD
10 IN THE NAME, DATE OF BIRTH, AND SOCIAL SECURITY NUMBER OF MELANYA A.

11 **COUNT 112**

12 **UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Melanya A.)**

13 On or about March 23, 2018, in the COUNTY of LOS ANGELES, the crime of IDENTITY
14 THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA
15 DADYAN, RICHARD AYVAZIAN, GRIGOR TATOIAN, ARTASHES MARTIROSYAN,
16 ARSHAK BARTOUMIAN, ESTEPHANIE REYNOSO, and ROSA ZARATE, who did willfully
17 and unlawfully with the intent to defraud sell, transfer, or convey the personal identifying
18 information of another person, to wit: MELANYA A.'S NAME ON A GRANT DEED FOR 3520
19 RIDGEFORD DRIVE, WESTLAKE VILLAGE, CALIFORNIA, FROM AAA ELECTRONICAL
20 ENGINEERING, INC. TO MELANYA A.

21 **COUNT 113**

22 **UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Melanya A.)**

23 On or about March 26, 2018, in the COUNTY of LOS ANGELES, the crime of IDENTITY
24 THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA
25 DADYAN, RICHARD AYVAZIAN, GRIGOR TATOIAN, ARTASHES MARTIROSYAN,
26 ARSHAK BARTOUMIAN, ESTEPHANIE REYNOSO, and ROSA ZARATE, who did willfully
27 and unlawfully with the intent to defraud sell, transfer, or convey the personal identifying
28 information of another person, to wit: A RENEW FUNDING CONTRACT IN THE NAME OF

1 MELANYA A.

2 **COUNT 114**

3 **UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Melanya A.)**

4 On or about April 11, 2018, in the COUNTY of LOS ANGELES, the crime of IDENTITY
5 THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA
6 DADYAN, RICHARD AYVAZYAN, GRIGOR TATOIAN, ARTASHES MARTIROSYAN,
7 ARSHAK BARTOUMIAN, ESTEPHANIE REYNOSO, and ROSA ZARATE, who did willfully
8 and unlawfully with the intent to defraud sell, transfer, or convey the personal identifying
9 information of another person, to wit: FEDERAL ESCROW, INC. DOCUMENTS IN THE NAME
10 OF MELANYA A.

11 **COUNT 115**

12 **FORGERY RELATING TO IDENTITY THEFT (Re: Melanya A.)**

13 On or about April 11, 2018, in the COUNTY of LOS ANGELES, the crime of FORGERY
14 in violation of Penal Code section 470(a), a felony, was committed by TAMARA DADYAN,
15 RICHARD AYVAZYAN, GRIGOR TATOIAN, ARTASHES MARTIROSYAN, ARSHAK
16 BARTOUMIAN, ESTEPHANIE REYNOSO, and ROSA ZARATE, who with the intent to
17 defraud, signed the name of another person or of a fictitious person to ESCROW DOCUMENTS
18 TO CONVEY ANY REAL PROPERTY, SPECIFICALLY FEDERAL ESCROW, INC.
19 DOCUMENTS IN THE NAME OF MELANYA A., knowing that they had no authority to do so.
20 Furthermore, the Defendants are charged in COUNT 114 with identity theft, as defined in Penal
21 Code section 530.5.

22 **COUNT 116**

23 **UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Melanya A.)**

24 On or about December 20, 2019, in the COUNTY of LOS ANGELES, the crime of
25 IDENTITY THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by
26 TAMARA DADYAN, RICHARD AYVAZYAN, GRIGOR TATOIAN, ARTASHES
27 MARTIROSYAN, ARSHAK BARTOUMIAN, ESTEPHANIE REYNOSO, and ROSA
28 ZARATE, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey the

personal identifying information of another person, to wit: RECORDED DOCUMENT NO. 20191423545 IN THE NAME OF MELANYA A.

COUNT 117

FORGERY RELATING TO IDENTITY THEFT (Re: Melanya A.)

On or about December 20, 2019, in the COUNTY of LOS ANGELES, the crime of FORGERY in violation of Penal Code section 470(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZIAN, GRIGOR TATOIAN, ARTASHES MARTIROSYAN, ARSHAK BARTOUMIAN, ESTEPHANIE REYNOSO, and ROSA ZARATE, who with the intent to defraud, signed the name of another person or of a fictitious person to CONVEY ANY REAL PROPERTY, SPECIFICALLY RECORDED DOCUMENT NO. 20191423545 IN THE NAME OF MELANYA A., knowing that they had no authority to do so. Furthermore, the Defendants are charged in COUNT 116 with identity theft, as defined in Penal Code section 530.5.

COUNT 118

PROCURING OR OFFERING FALSE OR FORGED INSTRUMENT (Re: Melanya A.)

On or about December 20, 2019, in the COUNTY of LOS ANGELES, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZIAN, GRIGOR TATOIAN, ARTASHES MARTIROSYAN, ARSHAK BARTOUMIAN, ESTEPHANIE REYNOSO, and ROSA ZARATE, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: RECORDED DOCUMENT NO. 20191423545 IN THE NAME OF MELANYA A.

COUNT 119

CONSPIRACY TO COMMIT GRAND THEFT (Re: Vahan T.)

On or about and between February 6, 2015 and August 27, 2018, in the COUNTY of LOS ANGELES, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZIAN, ARTUR AYVAZIAN,

1 ESTEPHANIE REYNOSO, and ROSA ZARATE, who did willfully and unlawfully conspire
2 together with another person or persons whose identity is known or unknown to commit the crime
3 of GRAND THEFT BY FALSE PRETENSES, 487(a), of the California Penal Code, a felony,
4 pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy,
5 Defendants committed the following overt act(s):

6 OVERT ACT 1

7 On or about February 6, 2015, Artur AYVAZYAN appeared as Vahan T. for a notarization
8 of a Deed of Trust for \$341,600 requested by Val-Chris Investments, Inc.

9 OVERT ACT 2

10 On or about January 5, 2016, Richard AYVAZYAN, posing as Vahan T., emailed a
11 homeowners association and stated, "Please change the mailing address of my account . . . New
12 Address: 22330 Victory Blvd #303, Woodland Hills, CA 91367."

13 OVERT ACT 3

14 On or about February 3, 2016, in response to a funding specialist, Richard AYVAZYAN,
15 posing as Vahan T., emailed Bank of America account statements ending in -6898 and a funding
16 application in the names of Vahan T.

17 OVERT ACT 4

18 On or about February 8, 2016, Richard AYVAZYAN, posing as Vahan T., emailed a lender
19 a credit report in the name of Vahan T. and stated, "Please see my credit report attached."

20 OVERT ACT 5

21 On or about February 24, 2016, in response to the lender, Richard AYVAZYAN, posing as
22 Vahan T., emailed a credit report in the name of Mariam T. and stated, "I had no clue of the
23 derogatory items that you found on my credit. I am in the process of trying to remove those items
24 from my credit profile. In the meanwhile...I am attaching my sisters credit report for your review."

25 OVERT ACT 6

26 On or about March 16, 2016, Richard AYVAZYAN, posing as Vahan T., emailed a lender a
27 loan modification agreement in the name of Vahan T. and stated, "Please see attached signed Loan
28 Modification Agreement. I will put the original in the mail today."

1 OVERT ACT 7

2 On or about April 11, 2016, Richard AYVAZYAN, posing as Vahan T., emailed Tamara
3 DADYAN and an escrow officer an invoice in the name of Vahan T. with the subject, "22330
4 Victory Blvd #303," and stated, "Here is a copy of my last mortgage payment from Loan Oak
5 Fund."

6 OVERT ACT 8

7 On or about May 10, 2016, Richard AYVAZYAN, posing as Vahan T., emailed the escrow
8 officer, "Thank you for sending me the estimate. Sure, I will then contact Tammy to get the rest of
9 the documents signed."

10 OVERT ACT 9

11 On or about May 11, 2016, Richard AYVAZYAN, posing as Vahan T., forwarded Tamara
12 DADYAN an email from an escrow officer, attached a blank Quitclaim Deed in the name of Vahan
13 T. for the property at 22330 Victory Boulevard, #303, Woodland Hills, California 91302, and
14 stated, "Tam I just got this from escrow. Can u have the girls notarize this please. I'm not in the
15 office."

16 OVERT ACT 10

17 On or about May 13, 2016, Tamara DADYAN, Estephanie REYNOSO, and Rosa ZARATE
18 used Vahan T.'s name and Anthony A.'s name on a Grant Deed transferring the property at 22330
19 Victory Boulevard, #303, Woodland Hills, California 91302 from Vahan T. to Anthony A.

20 OVERT ACT 11

21 On or about July 28, 2016, Richard AYVAZYAN, posing as Vahan T., requested that Rogelio
22 V. be added as an authorized user for a Chase bank account ending in -3852 in the name of Vahan
23 T.

24 OVERT ACT 12

25 On or about August 1, 2016, Richard AYVAZYAN, Estephanie REYNOSO, and Rosa
26 ZARATE wired \$210,000 from a Bank of America account ending in -6529 in the name of Andrew
27 A. to a Bank of America account ending in -6898 in the name of Vahan T.

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1 OVERT ACT 13

2 On or about August 1, 2016, Richard AYVAZYAN, Estephanie REYNOSO, and Rosa
3 ZARATE wired \$100,900 from a Bank of America account ending in -6898 in the name of Vahan
4 T. into a Bank of America account ending in -4999 in the name of Vahan T.

5 OVERT ACT 14

6 On or about August 15, 2016, Richard AYVAZYAN, posing as Vahan T., emailed himself
7 posing as Sarkis B., recommending Sarkis B. and Savs Enterprise as a contractor for home
8 improvement.

9 OVERT ACT 15

10 On or about October 4, 2016, Richard AYVAZYAN, using the email address
11 vahant818@yahoo.com, sent an email to the savsenterprise@yahoo.com email address and stated,
12 "Need to talk. Call me."

13 OVERT ACT 16

14 On or about January 10, 2017, Richard AYVAZYAN emailed Tamara DADYAN a Grant
15 Deed transferring the property at 22330 Victory Boulevard, #303, Woodland Hills, California
16 91302 from Vahan T. to Anthony A., with the subject, "Grant Deed for moms condo."

17 OVERT ACT 17

18 On or about January 20, 2017, Richard AYVAZYAN emailed VIP Tickets Sherman Oaks
19 payment confirmation of Los Angeles Laker's tickets, a credit card, and a driver's license with
20 Artur AYVAZYAN's picture, in the name of Vahan T.

21 OVERT ACT 18

22 On or about March 8, 2017, Richard AYVAZYAN, posing as Anthony A., emailed Level 3
23 Homes a lease agreement for the property at 5141 Genesta Avenue in Encino, California, and listed
24 Vahan T. as a tenant with Vahan T.'s signature.

25 OVERT ACT 19

26 On or about March 15, 2017, Richard AYVAZYAN emailed Tamara DADYAN with the
27 subject, "Checks," and attached two images of checks labeled "Cancelled Check[s]," in the name
28 of Vahan T.

1 OVERT ACT 20

2 On or about June 26, 2017, Richard AYVAZYAN, from the vahant818@yahoo.com email,
3 sent a payment confirmation of \$17,500 from a Bank of America account ending in -4999 in the
4 name of Vahan T. regarding a down payment for the property at 7106 Jellico Avenue, Van Nuys,
5 Los Angeles, California, in the name of Armen I.

6 OVERT ACT 21

7 On or about September 26, 2017, Richard AYVAZYAN purchased two roundtrip airline
8 tickets from Los Angeles, California to Rome, Italy using a Chase credit card ending in -3852 in
9 the name of Vahan T.

10 OVERT ACT 22

11 On or about August 27, 2018, in response to American Express's Global Security
12 Investigations, Richard AYVAZYAN, posing as Vahan T., stated, "I appreciate your being bluntly
13 and addressing your concerns. Unfortunately, I can not speak with Rich [Ayvazyan] because he
14 passed away from a car accident about 5 months ago (writing this with teary eyes). If you do have
15 some suspicion on any of those charges and do think that he might have deceived/tricked me about
16 it. I would not be able to get to the bottom of it. I am heart broken as it is with his passing and
17 would appreciate that you can understand the situation."

18 COUNT 120

19 MONEY LAUNDERING (Re: Vahan T.)

20 On or about June 29, 2017, in the COUNTY of LOS ANGELES, the crime of MONEY
21 LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by
22 TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, ESTEPHANIE
23 REYNOSO, and ROSA ZARATE, who did unlawfully conduct transactions involving monetary
24 instruments of a value exceeding \$25,000, through a financial institution knowing that the monetary
25 instruments represented the proceeds of, and was derived directly or indirectly from the proceeds
26 of, criminal activity, to wit: \$44,000 THROUGH ONE TRANSACTION.

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COUNT 121

UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Vahan T.)

On or about September 26, 2017, in the COUNTY of LOS ANGELES, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZIAN, ARTUR AYVAZIAN, ESTEPHANIE REYNOSO, and ROSA ZARATE, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey the personal identifying information of another person, to wit: A CHASE CREDIT CARD ENDING IN -3852 IN THE NAME OF VAHAN T.

COUNT 122

UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Vahan T.)

On or about August 27, 2018, in the COUNTY of LOS ANGELES, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZIAN, ARTUR AYVAZIAN, ESTEPHANIE REYNOSO, and ROSA ZARATE, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey the personal identifying information of another person, to wit: A YAHOO EMAIL IN THE NAME OF VAHAN T.

COUNT 123

CONSPIRACY TO COMMIT GRAND THEFT (Re: Larisa K.)

On or about and between February 24, 2016, and August 2, 2018, in the COUNTY of LOS ANGELES, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was committed by TAMARA DADYAN, RICHARD AYVAZIAN, ARTUR AYVAZIAN, ANDRANIK PETROSYAN, LILIT MALYAN, GRIGOR TATOIAN, ARTASHES MARTIROSYAN, ARSHAK BARTOUMIAN, ROSA ZARATE, ESTEPHANIE REYNOSO, and VANESSA RAY BELL, who did willfully and unlawfully conspire together with another person or persons whose identity is known or unknown to commit the crime of GRAND THEFT BY FALSE PRETENSES, 487(a), of the California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

1 OVERT ACT 1

2 On or about January 12, 2016, Tamara DADYAN emailed Victoria Akopyan with the
3 subject, "Keep this for your records this is the closing stmt for the house," and attached an escrow
4 statement in Larisa K.'s name of the Buyer's Estimated Closing Costs for a Banc of California loan
5 as to the property located at 17966 Valley Vista Blvd. in Encino, California.

6 OVERT ACT 2

7 On or about January 15, 2016, Tamara DADYAN obtained a \$1,072,000 loan from Banc of
8 California in Larisa K.'s name for the property located at 17966 Valley Vista Blvd. in Encino,
9 California, based in part on Larisa K.'s purported monthly salary of \$16,500 from American Eagle
10 Nursing Registry.

11 OVERT ACT 3

12 On or about February 24, 2016, Tamara DADYAN emailed Victoria Akopyan a credit report
13 in the name of Larisa K.

14 OVERT ACT 4

15 On or about February 25, 2016, Tamara DADYAN emailed Victoria Akopyan a loan
16 application in the name of Larisa K. for the purchase of a property located at 13546 Sarah Street in
17 Sherman Oaks.

18 OVERT ACT 5

19 On or about April 12, 2016, Tamara DADYAN emailed Grigor TATOIAN an image of a
20 driver's license in the name of Larisa K., with the subject, "Ask ur friend if she has a existing
21 account first."

22 OVERT ACT 6

23 On or about July 8, 2016, Tamara DADYAN emailed Richard AYVAZYAN a credit report
24 in the name of Larisa K.

25 OVERT ACT 7

26 On or about August 20, 2016, Tamara DADYAN emailed Victoria Akopyan documents from
27 the California Secretary of State for "AAA Electronical Engineer, Inc.," that listed Larisa K. as the
28 Director and Secretary of the corporation.

1 OVERT ACT 8

2 On or about August 31, 2016, Tamara DADYAN used Larisa K.'s name and Karen S.'s
3 notary stamp on a Grant Deed from AAA Electronical Engineering, Inc., to Melanya A., for the
4 property located at 3520 Ridgeford Drive in Westlake Village, California.

5 OVERT ACT 9

6 On or about September 7, 2016, Tamara DADYAN emailed Grigor TATOIAN with the
7 subject, "AAA Electronical Engineer," writing, "Have Gagik K[.] sign SI-200 & Purchase
8 Agreement and take it to bank for new account." DADYAN attached documents from the
9 California Secretary of State for "AAA Electronical Engineer, Inc.," that listed Larisa K. as the
10 Incorporator of the corporation.

11 OVERT ACT 10

12 On or about October 11, 2016, Tamara DADYAN used Larisa K.'s name for a \$760,000 loan
13 from Private Capital Management on the property located at 13546 Sarah St. in Sherman
14 Oaks, California.

15 OVERT ACT 11

16 On or about October 21, 2016, Tamara DADYAN emailed Richard AYVAZYAN a driver's
17 license and social security card in the name of Larisa K., with the subject, "Larissa apply on 13546
18 sara st sherman oaks ca 91423 or 403."

19 OVERT ACT 12

20 On or about December 7, 2016, Estephanie REYNOSO created a Yahoo email account using
21 Larisa K.'s name.

22 OVERT ACT 13

23 On or about January 24, 2017, Richard AYVAZYAN used the U.S. Bank account ending in
24 -2662 held in Andrew A.'s name to obtain \$119,145 from Renew Funding for purported
25 improvements to a property in Larisa K.'s name located at 13546 Sarah Street in Sherman Oaks.

26 OVERT ACT 14

27 On or about April 13, 2018, Grigor TATOIAN filed a bankruptcy petition in the name of
28 Larisa K. in Central District of California Case No. 18-bk-10905.

OVERT ACT 15

On or about May 29, 2018, Artur AYVAZYAN filed a bankruptcy petition in the name of Larisa K. in Central District of California Case No. 18-bk-11359.

OVERT ACT 16

On or about June 29, 2018, Tamara DADYAN emailed Artashes MARTIROSYAN with the subject, "Stamp goes on page 2 dates need to match date there," attaching a bankruptcy notice in Larisa K.'s name as well as a Deed of Trust for the 12334 Longacre property in Larisa K.'s name.

OVERT ACT 17

On or about August 2, 2018, Tamara DADYAN emailed Artashes MARTIROSYAN with the subject, "EXHIBITS AND TIME LINE FOR LARISSA K[.]," detailing efforts to avoid foreclosure on the 17966 Valley Vista property where Larisa K.'s purported daughter, Victoria Akopyan, lived.

COUNT 124

PROCURING OR OFFERING FALSE OR FORGED INSTRUMENT (Re: Larisa K.)

On or about April 13, 2018, in the COUNTY of LOS ANGELES, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, ANDRANIK PETROSYAN, LILIT MALYAN, GRIGOR TATOIAN, ARTASHES MARTIROSYAN, ARSHAK BARTOUMIAN, ROSA ZARATE, ESTEPHANIE REYNOSO, and VANESSA RAY BELL, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: BANKRUPTCY PETITION IN LARISA K.'S NAME IN CENTRAL DISTRICT OF CALIFORNIA CASE NO. 18-BK-10905.

COUNT 125

PROCURING OR OFFERING FALSE OR FORGED INSTRUMENT (Re: Larisa K.)

On or about May 29, 2018, in the COUNTY of LOS ANGELES, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT in violation of Penal Code section

1 115(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR
2 AYVAZYAN, ANDRANIK PETROSYAN, LILIT MALYAN, GRIGOR TATOIAN,
3 ARTASHES MARTIROSYAN, ARSHAK BARTOUMIAN, ROSA ZARATE, ESTEPHANIE
4 REYNOSO, and VANESSA RAY BELL, who did unlawfully and knowingly procure or offer a
5 false or forged instrument to be filed, registered, or recorded in a public office in California, which
6 instrument, if genuine, might be filed, registered, or recorded under a law of California or the United
7 States, to wit: BANKRUPTCY PETITION IN LARISA K.'S NAME IN CENTRAL DISTRICT
8 OF CALIFORNIA CASE NO. 18-BK-11359.

9 **COUNT 126**

10 **PROCURING OR OFFERING FALSE OR FORGED INSTRUMENT (Re: Larisa K.)**

11 On or about November 6, 2018, in the COUNTY of LOS ANGELES, the crime of
12 PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT in violation of Penal
13 Code section 115(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN,
14 ARTUR AYVAZYAN, ANDRANIK PETROSYAN, LILIT MALYAN, GRIGOR TATOIAN,
15 ARTASHES MARTIROSYAN, ARSHAK BARTOUMIAN, ROSA ZARATE, ESTEPHANIE
16 REYNOSO, and VANESSA RAY BELL, who did unlawfully and knowingly procure or offer a
17 false or forged instrument to be filed, registered, or recorded in a public office in California, which
18 instrument, if genuine, might be filed, registered, or recorded under a law of California or the United
19 States, to wit: A COMPLAINT IN LARISA K.'S NAME IN LOS ANGELES SUPERIOR COURT
20 CASE NO. 18VECV00146.

21 **COUNT 127**

22 **CONSPIRACY TO COMMIT GRAND THEFT (Re: Mykhailo D.)**

23 On or about and between June 1, 2016, and July 26, 2018, in the COUNTY of LOS
24 ANGELES, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony,
25 was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN,
26 LILIT MALYAN, ARTASHES MARTIROSYAN, GRIGOR TATOIAN, ROSA ZARATE,
27 ESTEPHANIE REYNOSO, and VANESSA RAY BELL, who did willfully and unlawfully
28 conspire together with another person or persons whose identity is known or unknown to commit

1 the crime of GRAND THEFT BY FALSE PRETENSES, 487(a), of the California Penal Code, a
2 felony, pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid
3 conspiracy, Defendants committed the following overt act(s):

4 OVERT ACT 1

5 On or about April 7, 2016, Tamara DADYAN used Mykhailo D.'s name and Jon B.'s name
6 and notary stamp to obtain a \$513,000 loan from Stearns Lending for the property located at 1124
7 S. Normandie Avenue in Los Angeles.

8 OVERT ACT 2

9 On or about August 22, 2016, Richard AYVAZYAN and Estephanie REYNOSO used
10 Mykhailo D.'s name to create a Yahoo account.

11 OVERT ACT 3

12 On or about November 1, 2016, Richard AYVAZYAN used Mykhailo D.'s name to receive
13 \$69,880 from Ygrene Energy Fund for purported improvements to the 1124 S. Normandie property.

14 OVERT ACT 4

15 On or about November 7, 2016, Richard AYVAZYAN used Mykhailo D.'s name to apply
16 for \$62,300 from Renew Funding for purported improvements to the 1124 S. Normandie property.

17 OVERT ACT 5

18 On or about October 23, 2017, Tamara DADYAN used Mykhailo D.'s name to receive
19 \$14,878.72 from the proceeds of the trustee's sale of the 1124 S. Normandie property.

20 OVERT ACT 6

21 On or about October 26, 2017, Tamara DADYAN deposited a \$15,000.07 check to a Bank
22 of America account ending in -5068 in the name of AAA Electronical Engineering that was
23 controlled by DADYAN.

24 OVERT ACT 7

25 On or about February 6, 2018, Tamara DADYAN emailed herself Wells Fargo Business
26 Account application documents in the name of Mykhail D., for the purported business, "MD
27 Acquisition Servives," writing in the subject, "Print and fax it to Well's Fargo Bank Art will give
28 you the NR#."

1 OVERT ACT 8

2 On or about February 26, 2018, Tamara DADYAN emailed Artur AYVAZYAN with the
3 subject, "Mykhail for Wells Fargo Bank," and attached the Business Account application
4 documents, as well as images of a driver's license and social security card in Mykhailo D.'s name.

5 OVERT ACT 9

6 On or about February 27, 2018, Tamara DADYAN emailed Vanessa BELL with the subject,
7 "I need an EOI," and listed a property located at 2283 Westshore Lane in Thousand Oaks, as well
8 as Mykhailo D.'s name.

9 OVERT ACT 10

10 On or about February 27, 2018, Vanessa BELL emailed Tamara DADYAN and attached an
11 Evidence of Insurance (EOI) document in the name of "Mykhail" D. for the 2283 Westshore
12 property.

13 OVERT ACT 11

14 On or about March 12, 2018, Richard AYVAZYAN emailed a Wells Fargo email account
15 and attached the Business Account application documents, as well as a Fictitious Business Name
16 statement in Mykhail D.'s name.

17 OVERT ACT 12

18 On or about April 9, 2018, Tamara DADYAN emailed an AOL account in the name of
19 Mykhailo D., which was controlled by DADYAN, and attached loan application documents in
20 Mykhailo D.'s name for the 2283 Westshore property with California Hard Money Direct listed as
21 the lender.

22 OVERT ACT 13

23 On or about April 11, 2018, Tamara DADYAN emailed Grigor TATOIAN and wrote,
24 "Look," attaching a screenshot of messages from the website "Hard Money Updates" that listed
25 "Myk" D. as the client and stated, "Our investor Camano Group is going to fund this."

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1 OVERT ACT 14

2 On or about April 19, 2018, Artashes MARTIROSYAN emailed Tamara DADYAN with the
3 subject, "Mykhail," and attached a W-2 statement in Mykhailo D.'s name purportedly from "AAA
4 Electronical Engineer, Inc."

5 OVERT ACT 15

6 On or about April 24, 2018, Tamara DADYAN used the Wells Fargo account ending in -
7 2440 held in Mykhailo D.'s name to obtain a \$586,291.77 wire from Stewart Title for "closing
8 proceeds" related to the 2283 Westshore property.

9 OVERT ACT 16

10 On or about July 26, 2018, Lilit MALYAN deposited a \$7,000 check to "Cash" from the
11 Wells Fargo account ending in -2440 held in Mykhailo D.'s name to the Chase account ending in -
12 5723 that MALYAN controlled.

13 COUNT 128

14 MORTGAGE FRAUD (Re: Mykhailo D.)

15 On or about and between February 27, 2018, and April 24, 2018, in the COUNTIES of LOS
16 ANGELES and VENTURA, the crime of MORTGAGE FRAUD in violation of Penal Code section
17 532f(a)(2), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZIAN, ARTUR
18 AYVAZIAN, GRIGOR TATOIAN, ARTASHES MARTIROSYAN, ROSA ZARATE,
19 ESTEPHANIE REYNOSO, and VANESSA RAY BELL, who did unlawfully and deliberately use
20 or facilitate the use of a misstatement, misrepresentation, or omission, with the knowledge it
21 contained a misstatement, misrepresentation, or omission, during the mortgage lending process,
22 with the intention that it be relied upon by a mortgage lender, borrower, or other party to the
23 mortgage lending process, to wit: CALIFORNIA HARD MONEY DIRECT/CAMANO GROUP.
24 It is further alleged, pursuant to Penal Code section 532f(j), that the value of the fraud exceeds
25 \$950.

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COUNT 129

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GRAND THEFT (Re: Mykhailo D.)

On or about and between February 27, 2018, and April 24, 2018, in the COUNTIES of LOS ANGELES and VENTURA, the crime of GRAND THEFT in violation of Penal Code section 487(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, GRIGOR TATOIAN, ARTASHES MARTIROSYAN, ROSA ZARATE, ESTEPHANIE REYNOSO, and VANESSA RAY BELL, who did knowingly and designedly, by a false or fraudulent representation or pretense, obtain money or real property by fraud from CAMANO GROUP, SPECIFICALLY, A \$610,000 LOAN FOR 2283 WESTSHORE LANE IN THOUSAND OAKS, CALIFORNIA, which had a value exceeding nine hundred fifty dollars (\$950).

23

COUNT 130

UNLAWFUL TRANSFER OF IDENTIFYING INFORMATION (Re: Mykhailo D.)

On or about April 20, 2018, in the COUNTY of LOS ANGELES, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(d)(1), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, GRIGOR TATOIAN, ARTASHES MARTIROSYAN, ROSA ZARATE, ESTEPHANIE REYNOSO, and VANESSA RAY BELL, who did willfully and unlawfully with the intent to defraud sell, transfer, or convey the personal identifying information of another person, to wit: MYKHAILO D.'S NAME ON THE CAMANO GROUP DEED OF TRUST.

23

COUNT 131

PROCURING OR OFFERING FALSE OR FORGED INSTRUMENT (Re: Mykhailo D.)

On or about April 20, 2018, in the COUNTY of VENTURA, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, GRIGOR TATOIAN, ARTASHES MARTIROSYAN, ROSA ZARATE, ESTEPHANIE REYNOSO, and VANESSA RAY BELL, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in

1 California, which instrument, if genuine, might be filed, registered, or recorded under a law of
2 California or the United States, to wit: VENTURA COUNTY RECORDED DOCUMENT
3 NUMBER 20180424-00046902-0 1/16 IN THE NAME OF MYKHAILO D.

4 **COUNT 132**

5 **MORTGAGE FRAUD EXCEEDING \$950: FILING A FRAUDULENT DOCUMENT**

6 **(Re: Mykhailo D.)**

7 On or about April 20, 2018, in the COUNTY of VENTURA, the crime of FILING A
8 FRAUDULENT DOCUMENT in violation of Penal Code section 532f(a)(4), a felony, was
9 committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, GRIGOR
10 TATOIAN, ARTASHES MARTIROSYAN, ROSA ZARATE, ESTEPHANIE REYNOSO, and
11 VANESSA RAY BELL, who did with the intent to defraud, file or cause to be filed with the
12 recorder of any county in connection with a mortgage loan transaction, a document with the
13 knowledge the document contains a deliberate misstatement, misrepresentation, or omission, to wit:
14 VENTURA COUNTY RECORDED DOCUMENT NUMBER 20180424-00046902-0 1/16 IN
15 THE NAME OF MYKHAILO D. It is further alleged that the value of the fraud exceeds nine
16 hundred fifty dollars (\$950), within the meaning of Penal Code section 532f(j).

17 **COUNT 133**

18 **MONEY LAUNDERING (Re: Mykhailo D.)**

19 On or about and between April 26, 2018, and May 24, 2018, in the COUNTY of LOS
20 ANGELES, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a
21 felony, was committed by TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR
22 AYVAZYAN, LILIT MALYAN, ARTASHES MARTIROSYAN, ROSA ZARATE,
23 ESTEPHANIE REYNOSO, and VANESSA RAY BELL, who did unlawfully conduct transactions
24 involving monetary instruments of a value exceeding \$25,000, through a financial institution
25 knowing that the monetary instruments represented the proceeds of, or was derived directly or
26 indirectly from the proceeds of, criminal activity, to wit: \$162,619.96 TOTAL THROUGH AT
27 LEAST FOUR TRANSACTIONS, AS DETAILED IN THE TABLE BELOW. It is further
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alleged, pursuant to Penal Code section 186.10(c)(1)(B), that the value of the transactions exceeds one hundred fifty thousand dollars (\$150,000) but is less than one million dollars (\$1,000,000).

DATE	AMOUNT	TRANSACTION
4/26/18	\$56,097	Wells Fargo -2440 check to Wells Fargo -0950
4/30/18	\$55,400.79	Wells Fargo -0950 check to Bank of America -5068
5/1/18	\$1,122	Wells Fargo -0950 check for 5525 Oakdale office rent
5/10/18	\$50,000.17	Wells Fargo -2440 check to Wells Fargo -0950

FIRST SPECIAL ALLEGATION

[AGGRAVATED WHITE-COLLAR CRIME IN EXCESS OF \$500,000]

It is further alleged pursuant to Penal Code section 186.11(a)(2), that TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, GRIGOR TATOIAN, ANDRANIK PETROSYAN, ARTASHES MARTIROSYAN, ARSHAK BARTOUMIAN, LILIT MALYAN, LUBIA CARRILLO, ROSA ZARATE, ESTEPHANIE REYNOSO, and VANESSA RAY BELL, committed two or more related felonies to wit: the counts alleged against each of them in this Indictment, a material element of which is fraud, involving a pattern of related felony conduct and the taking of, or resulted in the loss by another person or entity of, more than five hundred thousand dollars (\$500,000).

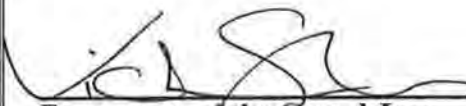
SECOND SPECIAL ALLEGATION

[THEFT OF AMOUNT OVER \$100,000 (PENAL CODE SECTION 1203.045)]

It is further alleged that TAMARA DADYAN, RICHARD AYVAZYAN, ARTUR AYVAZYAN, GRIGOR TATOIAN, ANDRANIK PETROSYAN, ARTASHES MARTIROSYAN, ARSHAK BARTOUMIAN, LILIT MALYAN, LUBIA CARRILLO, ROSA ZARATE, ESTEPHANIE REYNOSO, and VANESSA RAY BELL, in the commission of the Grand Theft counts alleged against them in this Indictment, with the intent to do so, took funds of a value exceeding one hundred thousand dollars (\$100,000) within the meaning of Penal Code section 1203.045.

//

A TRUE BILL, and with a finding that the requirements of Penal Code section 923(c) have been satisfied.


Foreperson of the Grand Jury

1
Juror #

Dated: 4/26/21

**THE FOLLOWING WITNESSES APPEARED BEFORE THE GRAND JURY IN THE
ABOVE-CAPTIONED MATTER:**

- | | |
|----------------------|----------------------------|
| 1. Lyle Barnes | 25. David W. |
| 2. James Harbin | 26. Paul Fedynich |
| 3. James Thiede | 27. Kevin Hoffman |
| 4. Sarkis B. | 28. Robin Letourneau |
| 5. Fatima J. | 29. Lisa Barr |
| 6. Golie Ghoreishi | 30. Flor Martinez |
| 7. PattiAnn Brundige | 31. Nina Kaminsky |
| 8. Edward Treder | 32. Timony Dharmpetarsakul |
| 9. Jennifer Link | 33. Anita M. |
| 10. Lara Donigian | 34. Pauline S. |
| 11. Dennis V. | 35. John W. |
| 12. Linda Huynh | 36. Jeremiah S. |
| 13. Marissa Gil | 37. Jon B. |
| 14. Dennis Jin | 38. Erwin N. |
| 15. Jason Schermer | 39. Roy D. |
| 16. Supriva Sachar | 40. Corrie S. |
| 17. Vincent Hill | 41. Silver D.V. |
| 18. Renee Byrom | 42. Carolyn S. |
| 19. Lori H. | 43. Karen S. |
| 20. Elizabeth W. | 44. Adam S. |
| 21. Jean W. | 45. Trevor Larsen |
| 22. Damon B. | 46. Angelica Aguilar |
| 23. Evet Minasian | 47. Razmik Galoosian |
| 24. Gustavo Garcia | |