



UNITED STATES DISTRICT COURT

for the

Central District of California



United States of America

v.

ARMAN MANUKYAN,

Defendant(s)

Case No. 2:20-mj-03710

**CRIMINAL COMPLAINT BY TELEPHONE
OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. Beginning in or before 2020, and continuing through July, 2020, in the county of Los Angeles in the Central District of California, the defendant(s) violated the following statutes as described in the attachment:

Code Sections

18 U.S.C. §§ 1344, 1028A

*Offense Description*Bank Fraud, Aggravated Identity
Theft

This criminal complaint is based on these facts:

Please see attached affidavit.☒ Continued on the attached sheet./s/ Alfredo Rossi

Complainant's signature

Alfredo Rossi, Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: August 10, 2020

Karen L. Stevenson
Judge's signature

City and state: Los Angeles, CaliforniaHon. Karen L. Stevenson, U.S. Magistrate Judge

Printed name and title

Complaint Attachment

Count One (18 U.S.C. § 1349)

Beginning before 2020, and continuing through July, 2020, in Los Angeles County, within the Central District of California, and elsewhere, defendant ARMAN MANUKYAN, acting with the intent to defraud, knowingly executed and attempted to execute a scheme to defraud Bank of America, a federally-insured financial institution, as to material matters, and to obtain moneys and funds owned by and in the custody and control of Bank of America by means of material false and fraudulent pretenses, representations, and promises, and the concealment of material facts. To execute the fraudulent scheme, defendant applied for and received government unemployment benefits—as both other individuals and as businesses—using false information. Defendant used Bank of America-issued debit cards issued in the names of victims of identity theft to withdraw as cash from ATMs the unemployment benefits issued to those persons. Defendant also falsely told Bank of America that his shell businesses, Argo Global, Inc., and Express Wiring, employed scores of workers in order to receive through that financial institution \$1.7 million in Paycheck Protection Programs loans.

Count Two (18 U.S.C. § 1028A)

Beginning before 2020, and continuing through July, 2020, in Los Angeles County, within the Central District of California, and elsewhere, defendant ARMAN MANUKYAN knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person during and in relation to a felony violation of Title 18, United States Code, Section 1344, Bank Fraud, as charged in Count One, knowing that the means of identification belonged to another actual person.

AFFIDAVIT

I, Alfredo Rossi, being duly sworn, declare and state as follows:

I. PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of a criminal complaint and arrest warrant against Arman MANUKYAN ("MANUKYAN") for violations of Title 18, United States Code, §§ 1344 and 1028A (Bank Fraud and Aggravated Identity Theft).

2. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

II. BACKGROUND OF SPECIAL AGENT ALFREDO ROSSI

3. I am a Special Agent with Homeland Security Investigations ("HSI") and have been so employed since June 2019. I am currently assigned to the High Intensity Financial Crimes Area ("HIFCA") group, where I investigate matters concerning bank fraud, wire fraud, identity theft, money laundering, and other illegal financial transactions.

4. Prior to becoming a Special Agent with HSI, I was employed as Special Agent with the United States Secret Service ("USSS") from June 2016 until June 2019, where I was responsible for the investigation of various types of theft and fraud, including the

1 manufacturing of counterfeit and fraudulent identification documents,
2 and the investigation of financial crimes (such as access device
3 crimes, credit card fraud, check fraud, and schemes to conceal and
4 launder the proceeds of such crimes).

5 5. To become an HSI Special Agent, I completed 9 months of
6 training at the Federal Law Enforcement Training Center in Brunswick,
7 Georgia. During my employment as an HSI and USSS Special Agent, I
8 have participated in several investigations related to alien
9 smuggling, narcotics smuggling, weapons trafficking, organized
10 criminal activity, child exploitation, and financial crimes. I have
11 participated in various aspects of criminal investigations, including
12 bank records analysis, telephone records analysis, electronic
13 surveillance, physical surveillance, search warrants, arrests, and
14 reviewing evidence from digital devices. I have also spoken to many
15 law enforcement agents regarding their experience in criminal
16 investigations, interviewed defendants, confidential informants, and
17 witnesses who had personal knowledge regarding the methods used to
18 commit various types of criminal offenses.

19 6. Any facts or circumstances that are cited in this affidavit
20 are familiar to me through my direct participation in this
21 investigation, discussions with other law enforcement personnel
22 involved in this investigation, and/or my review of investigative
23 reports generated by other law enforcement personnel. This affidavit
24 is made for the sole purpose of demonstrating probable cause for the
25 issuance of the requested search warrant and does not purport to set
26 forth all of my knowledge of or investigation into this matter.
27 Unless specifically indicated otherwise, all conversations and
28

1 statements described in this affidavit are related in substance and
2 in part only.

3 **III. SUMMARY OF PROBABLE CAUSE**

4 7. In or about June 2020, MANUKYAN submitted two applications
5 for loans to Bank of America ("BoFA") on behalf of two shell entities
6 registered to MANUKYAN - Argo Global Inc. ("Argo Global"), and
7 Express Wiring -- through the Paycheck Protection Program ("PPP")
8 established by the Coronavirus Aid, Relief, and Economic Security Act
9 for a total loanable amount of \$1.7 million. BoFA approved the Argo
10 Global loan and denied the Express Wiring one, and as a result,
11 MANUKYAN received a total of \$867,187 in funds. In the application
12 process, MANUKYAN attached fabricated tax documentation and made
13 false representations about the operational status of the companies,
14 and how the loan proceeds would be spent. Shortly after receiving the
15 funds in a business account in Argo Global's name, MANUKYAN
16 transferred most of the balance to an external account for which he
17 is the sole signator as well as to another BoFA personal account for
18 which MANUKYAN is also the sole signator.

19 **IV. PREVIOUS GPS AND BANK ACCOUNT SEIZURE WARRANTS**

20 8. Based on an earlier affidavit, on July 7, 2020, the
21 Honorable John E. McDermott, United States Magistrate Judge, issued a
22 GPS tracking affidavit for a cellular telephone number used by ARMAN
23 MANUKYAN, as well as a second number reported by ARMAN MANUKYAN which
24 he does not appear to use, along with a seizure warrant for three of
25 ARMAN MANUKYAN's bank accounts. Through the GPS warrant, I was able
26 to locate MANUKYAN's residence, and subsequently obtained and
27 executed federal search warrants there, as described in more detail
28 below.

1 **V. STATEMENT OF PROBABLE CAUSE**

2 9. Based on my review of investigative reports and notes, bank
3 statements, witness statements, my discussions with other law
4 enforcement officers working on this investigation, and other
5 evidence, I learned the following information:

6 **A. The Paycheck Protection Program**

7 10. The Coronavirus Aid, Relief, and Economic Security
8 ("CARES") Act is a federal law enacted around March 2020 and was
9 designed to provide emergency financial assistance to the millions of
10 Americans who are suffering the economic effects caused by the COVID-
11 19 pandemic. One source of relief provided by the CARES Act was the
12 authorization of up to \$349 billion in forgivable loans to small
13 businesses for job retention and certain other expenses, through a
14 program referred to as the Paycheck Protection Program ("PPP").
15 Around April 2020, Congress authorized over \$300 billion in
16 additional PPP funding.

17 11. In order to obtain a PPP loan, a qualifying business must
18 submit a PPP loan application, which is signed by an authorized
19 representative of the business. The PPP loan application requires the
20 business (through its authorized representative) to acknowledge the
21 program rules and make certain affirmative certifications in order to
22 be eligible to obtain the PPP loan. One such certification requires
23 the applicant (through its authorized representative) to affirm that
24 "[t]he [PPP loan] funds will be used to retain workers and maintain
25 payroll or make mortgage payments, lease payments, and utility
26 payments; I understand that if the funds are used for unauthorized
27 purposes, the federal government may pursue criminal fraud charges."
28 In the PPP loan application, the small business (through its

1 authorized representative) must state, among other things, its: (a)
2 average monthly payroll expenses; and (b) number of employees. These
3 figures are used to calculate the amount of money the small business
4 is eligible to receive under the PPP. In addition, businesses
5 applying for a PPP loan must provide documentation showing their
6 payroll expenses.

7 12. A business PPP loan application is received and processed,
8 in the first instance, by a participating financial institution, then
9 transmitted, for further review, to the Small Business Administration
10 ("SBA") to assess the applicant's eligibility. If a PPP loan
11 application is approved, the participating financial institution
12 funds the PPP loan using its own monies.

13 13. PPP loan proceeds must be used by the business on certain
14 permissible expenses -- payroll costs, interest on mortgages, rent,
15 and utilities. The PPP allows the interest and principal on the PPP
16 loan to be entirely forgiven if the business spends the loan proceeds
17 on these expense items within a designated period of time (usually
18 eight weeks of receiving the proceeds) and uses at least 75% of the
19 PPP loan proceeds on payroll expenses.

20 **B. MANUKYAN Submitted Fabricated Tax Documents for His Shell**
21 **Business Argo Global to BofA for a PPP Loan**

22 14. From reviewing loan documents provided by BofA and the SBA,
23 I learned that in or around June 2020, MANUKYAN submitted two
24 applications for PPP loans to BofA which were consequently received
25 by the SBA, as follows:

26 a. First, MANUKYAN applied for a loan in the name of Argo
27 Global, claiming that Argo Global was a sewing business which
28 reported an average monthly payroll expenses of \$346,875 and a total

1 of 73 employees. The application listed MANUKYAN as the principal
2 with a home address of 209 E Palmer Ave Apt 214, Glendale. (I
3 learned from MANUKYAN's immigration file, however, that he told
4 immigration authorities that he did not live at that address, but
5 rather his ex-wife and son did.) The loan application listed the
6 address for Argo Global as 433 Camden Dr 6th floor, Beverly Hills,
7 California. As described later, this address actually corresponds to
8 a commercial mail receiving agency ("CMRA"), or virtual office. As
9 proof of Argo Global payroll expenses, MANUKYAN provided an Internal
10 Revenue Service ("IRS") Form 940 - Employer's Annual Federal
11 Unemployment (FUTA) dated on April 08 2020, and IRS Form 941 -
12 Employer's Quarterly Federal Tax dated on January 12, 2020,
13 purporting to show wages and taxes for Argo Global for tax year 2019
14 in the amount of \$4,162,500. These IRS documents were both submitted
15 to BofA unsigned. Additionally, the underwriting packet did not
16 include a list of employees or associates employed by Argo Global.

17 b. Second, MANUKYAN applied for a loan in the name of
18 Express Wiring, listing MANUKYAN as the principal and listing
19 MANUKYAN'S ADDRESS in Glendale as the loan mailing address. This PPP
20 loan application was sent to BofA few days after the Argo Global
21 application and was submitted for an amount of \$884,748. The SBA
22 rejected this application indicating that this loan had been
23 submitted either after the cutoff date of June 22, 2020 or the
24 government allocated funds for the PPP had run out.

25 15. I have reviewed additional representations MANUKYAN made
26 and submitted with the Argo Global loan application package (and
27 which were required by the SBA). Among other things, MANUKYAN
28 certified the following:

1 a. MANUKYAN certified that Argo Global was last
2 incorporated with the California Secretary of State on December 10,
3 2019 and "had employees for whom the applicant paid salaries and
4 payroll taxes or paid independent contractors."

5 b. MANUKYAN certified that "All SBA loan proceeds will
6 be used only for business-related purposes as specified in the loan
7 application and consistent with the Paycheck Protection Program
8 Rule."

9 c. MANUKYAN again certified that "the funds will be used
10 to retain workers and maintain payroll or make mortgage interest
11 payments, lease payments, and utility payments."

12 Argo Global Inc. Appears to Be a Shell Business

13 16. On or about July 1, 2020 I conducted a search of Argo
14 Global on open source search engines such as google as well as
15 business networking apps such as Yelp and did not observe any
16 information related to any sewing business matching the identifiers
17 provided by MANUKYAN.

18 There Is No Record of the Tax Payments Argo Global Claims

19 17. On or about July 2, 2020 I spoke with Special Agent ("SA")
20 Rob Bravo with the Treasury Inspector General for Tax Administration
21 ("TIGTA") regarding IRS Forms 940 and IRS Forms 941 that were
22 submitted by MANUKYAN as part of the loan application process to
23 represent the authenticity of the business Argo Global. SA Bravo
24 stated that no documentation regarding Argo Global could be found
25 across IRS databases generally, and that he could find no record that
26 the aforementioned Form 940 and Form 941 were ever actually filed
27 with the IRS in particular. On July 7, 2020, he told me that no tax
28

1 documents had ever been filed for Argo Global Inc., or for MANUKYAN's
2 other purported business, Express Wiring.

3 Express Wiring Also Appears to Be a Shell Business

4 18. On or about July 5, 2020 I conducted a search of Express
5 Wiring on open source search engines such as google as well as
6 business networking apps such as Yelp and did not observe any
7 information related to any business matching the identifiers provided
8 by MANUKYAN.

9 **C. BofA Funded the Argo Global Loan Based on the False**
10 **Information Provided by MANUKYAN**

11 19. According to bank records, on or about June 3, 2020, BofA
12 funded the Argo Global PPP loan, wiring the approved funds to BofA
13 business checking account 325117015294 held in the name of Argo
14 Global Inc., with MANUKYAN as the sole person with signature
15 authority over the account ("MANUKYAN's Argo Account"), for a total
16 of approximately \$867,187. On or about July 1, 2020, I reviewed the
17 account statements and signature card for Bank of America account
18 5294 (MANUKYAN's Argo Account) and learned the following:

19 a. MANUKYAN's Argo Account was opened in the name of
20 Argo Global by MANUKYAN on or about January 28, 2020 at a BofA branch
21 located at 7255 Woodman Ave, Van Nuys, California.

22 b. Before the SBA PPP loan disbursement on June 3, 2020,
23 MANUKYAN's Argo Account had a strange pattern of activity: there
24 were biweekly large cash deposits ranging from \$1,500 to \$21,977,
25 typically followed by similar-sized checks being written against the
26 account to MANUKYAN. As a consequence, the balance remained low. In
27 my training and experience, this pattern is indicative of money
28 laundering; criminals who are trying to make an account for a shell

1 business appear active will often make offsetting transactions to it
2 using funds and other accounts they control. My review of the bank
3 records did not show activity consistent with a sewing business. I
4 did not see any purchases at fabric or craft stores. I saw payments
5 to what appeared to be credit accounts held with "Infiniti" car
6 manufacturer, and to other financial institutions that referenced
7 MANUKYAN's name. Based on my training and experience it is uncommon
8 for a legitimate business operating in sewing and craft to be
9 receiving large amounts of cash into a newly opened business account.
10 Also based on my training and experience, a legitimate business would
11 not receive large cash payments during the covid-19 pandemic while
12 also applying for government relief to pay for employee wages and
13 unemployment.

14 **D. MANUKYAN rapidly transferred \$100k of SBA funds out of**
15 **MANUKYAN's Argo Account into MANUKYUAN'S BOTW ACCOUNT**

16 20. On or about June 4, 2020, one day after the \$867,187 PPP
17 funds were disbursed into MANUKYAN's Argo Account, MANUKYAN
18 transferred \$48,000 into BofA account 325090924800 ("MANUKYAN'S BOA
19 ACCOUNT"), followed by a second transfer of \$62,000 on or about June
20 5, 2020, also from MANUKYAN's Argo Account into a personal checking
21 accounts, MANUKYAN'S BOA ACCOUNT.

22 21. On or about July 6, 2020, I reviewed the account statements
23 and signature card for Bank of America account 4800 and learned that
24 MANUKYAN'S BOA ACCOUNT was opened in the name of MANUKYAN on or about
25 August 28, 2017 at a BofA branch located at 203 N Glendale Ave,
26 Glendale, California.

1 **E. MANUKYAN Wires Most of the SBA Loan Out of MANUKYAN's Argo**
2 **Account into MANUKYUAN'S BOTW ACCOUNT**

3 22. On or about June 17, 2020, MANUKYAN wired \$475,000 of the
4 PPP loan proceeds out of MANUKYAN's Argo Account to Bank of the West
5 account 053651949 ("MANUKYAN'S BOTW ACCOUNT"), followed by a second
6 wire for \$212,000 on June 18, 2020, to the same account.

7 23. On or about July 1, 2020, I reviewed the account statements
8 and signature card for MANUKYAN'S BOTW ACCOUNT and learned the
9 following:

10 a. MANUKYAN'S BOTW ACCOUNT was opened in the name of
11 MA&CO by MANUKYAN on or about May 22, 2018 at a Bank of the West
12 branch in Glendale, CA.

13 b. MANUKYAN listed phone number 857-505-8149 (**MANUKYAN'S**
14 **TELEPHONE**) as his personal cellphone number.

15 c. From the day the account was opened on or about May
16 22, 2018 with an initial starting deposit of \$100, through April
17 2020, MANUKYAN'S BOTW ACCOUNT was only used four times for one ATM
18 cash withdrawal of \$50, one ATM cash withdrawal of \$20, one debit
19 card purchase in the amount of \$9.84 at a Rite Aid store in Van Nuys,
20 California, and one debit card purchase in the amount of \$9.91 at a
21 Rite Aid store in Glendale, California. MANUKYAN'S BOTW ACCOUNT was
22 then used again in June 2020 for the two wires of SBA PPP funds for a
23 total of \$687,000 from ARG0's BOA ACCOUNT into MANUKYAN'S BOTW
24 ACCOUNT. MANUKYAN'S BOTW ACCOUNT also received two checks from
25 MANUKYAN's Argo Account in June 2020 for a total of \$44,900.

26 MANUKYAN Cannot Explain the Purpose of a \$200,000 Wire to APMEX

27 24. According to bank records, on June 24, 2020, MANUKYAN went
28 to a BOTW branch in Glendale, CA to wire \$200,000 from MANUKYAN'S

1 BOTW ACCOUNT to an account in the name of "APMEX". (According to a
2 web search, APMEX is a dealer in precious metals such as gold bars.
3 In my training and experience, those trying to launder substantial
4 sums often purchase precious metals because they are untraceable.)
5 The teller handling the transaction asked MANUKYAN the reason for the
6 large wire, and MANUKYAN replied that his accountant instructed him
7 to wire the funds out. Approximately 10 minutes after the completion
8 of the wire documentation for APMEX, MANUKYAN returned to the
9 Glendale branch and said he wanted to cancel the wire to "APMEX," and
10 instead asked to wire the \$200,000 to his personal savings account at
11 the Los Angeles Federal Credit Union ("MANUKYAN'S LAFCU ACCOUNT"),
12 however he did not have his account number, so the wire was not
13 completed.

14 An Hour Later, MANUKYAN Went to a Different Branch to Wire the
15 \$200,000 to His Personal Account Instead

16 25. That same day, approximately an hour after the original
17 attempted wire, MANUKYAN went to a different BOTW branch, this one in
18 Burbank, to wire the \$200,000 he tried to wire at the Glendale BOTW
19 branch earlier in the day, and this time was able to complete the
20 wire to his personal savings account at the Los Angeles Federal
21 Credit Union, number 10000007507320 (MANUKYAN'S LAFCU ACCOUNT). But
22 on or about June 25, 2020, the wire to the Los Angeles Federal Credit
23 Union was rejected, and the \$200,000 funds were returned to
24 MANUKYAN'S BOTW ACCOUNT. BOTW declared the account activity
25 suspicious and froze MANUKYAN'S BOTW ACCOUNT. On the same day, BOTW
26 contacted HSI for assistance with the investigation.

27 MANUKYAN Claims He Was Going to Use the \$200,000 to Start a New
28 Limousine Business, Contradicting His Certification on the PPP
Application

1 26. On or about June 26, 2020, MANUKYAN was contacted by a BOTW
2 bank investigator at phone number 857-505-8149 (**MANUKYAN'S TELEPHONE**)
3 and was asked to explain the nature of the funds and reason behind
4 the wires. MANUKYAN stated that his accountant told him to move
5 \$200,000 to his savings account and that he was just following his
6 accountant's instructions. Additionally, MANUKYAN stated that he was
7 in urgent need of the funds since he was planning on starting a new
8 limousine business and needed to place vehicle orders on Amazon.
9 MANUKYAN also stated that he had customers already lined up and that
10 the freeze would force him to terminate business with BOTW.

11 27. Based on my knowledge and experience, Amazon does not allow
12 the sale of vehicles on their online market and only allows users to
13 research vehicle's prices, shop for car accessories and upload
14 reviews. Also based on my training and experience investigating
15 fraud, I know that fraudsters often use high-pressure tactics to
16 influence others to give them money, expeditiously, such as through
17 threats to terminate a business relationship, like MANUKYAN did on
18 the call with the BOTW bank investigator.

19 MANUKYAN Transferred Fraud Proceeds from MANUKYAN's Argo Account to
20 MANUKYAN'S BOTW ACCOUNT and MANUKYAN'S LAFCU ACCOUNT

21 28. From reviewing Bank of America documents for MANUKYAN's
22 Argo Account, I learned that a few days after the PPP SBA loan funds
23 were deposited into that account, MANUKYAN rapidly withdrew the funds
24 in various ways. Starting on June 5, 2020, multiple checks were
25 drawn against MANUKYAN's Argo Account. The checks were made payable
26 to MANUKYAN, and negotiated at other financial institutions MANUKYAN
27 had accounts opened with. MANUKYAN negotiated the following checks
28 through the following SEIZABLE ACCOUNTS:

1 a. A check dated June 05, 2020 for \$6,200 at MANUKYAN'S
2 BOTW ACCOUNT;

3 b. A check dated June 05, 2020 for \$9,600 at MANUKYAN'S
4 LAFCU ACCOUNT;

5 c. A check dated June 11, 2020 for \$14,700 at MANUKYAN'S
6 LAFCU ACCOUNT; and

7 d. A check dated June 12, 2020 for \$38,700 at MANUKYAN'S
8 BOTW ACCOUNT.

9 29. Based on my training and experience, I know that all of the
10 financial institutions mentioned in this affidavit are federally
11 insured.

12 **F. Argo Global Inc.'s Current Address Is a Virtual Office/Mail**
13 **Drop**

14 30. On or about June 30, 2020 I conducted surveillance at 433 N
15 Camden Drive, Beverly Hills, California - an address that according
16 to the California Articles of Incorporation is associated with Argo
17 Global - and learned the following:

18 a. The building is managed by a company called ESDI which
19 leases virtual offices to several tenants. On or about July 1, 2020,
20 ESDI took over the management of the building from the previous
21 landlord, Barrister Executive Suites, Inc.

22 b. ESDI President Massy Fanzine explained to me that
23 after the recent change of management, some of the older tenants did
24 not renew their leases and elected to stay with Barrister Executive
25 Suites, relocating at their new address located at 9440 S Santa
26 Monica Blvd Suite 301, Beverly Hills, California. President Fanzine
27 stated that Argo Global was not one of their tenants and that it
28 likely moved over with Barrister Executive Suites.

1 31. Also on June 30, 2020 I conducted surveillance at 9440 S Santa
2 Monica Blvd Suite 301, Beverly Hills, CA and learned the following:

3 a. Barrister Executive Suites recently moved to this
4 address and appeared to be still undergoing the transition from the
5 older location. An administrator with Barrister Executive Suites
6 stated that Argo Global had been a tenant with Barrister Executive
7 Suites for less than a year and that the only service they provided
8 to Argo Global was holding their mail. Additionally, the Barrister
9 Executive Suites administrator stated that Argo Global never had an
10 actual office space and that no employees from Argo Global had ever
11 worked at the 433 N Camden Drive address or the 9440 S Santa Monica
12 Blvd address.

13 **G. Argo Global Inc.'s Original Address Was 7855 HAZELTINE**
14 **AVENUE**

15 32. On or about June 26, 2020, I reviewed the articles of
16 incorporation for Argo Global Inc. filed on or about January 30, 2018
17 with the California Secretary of State. This document lists MANUKYAN
18 as the initial agent for service of process of this business located
19 at 7855 HAZELTINE AVENUE (the official address of MANUKYAN'S
20 RESIDENCE).

21 **H. Argo Global Inc.'s Address of Record with the IRS is 7855**
22 **HAZELTINE AVENUE**

23 33. On or about July 15, 2020 I learned from SA Bravo with TIGTA
24 that a review of the IRS Integrated Data Retrieval System (IDRS)
25 showed that the address of record associated with the Employer
26 Identification Number (EIN) for Argo Global Inc. is 7855 HAZELTINE
27 AVENUE.
28

1 **I. MANUKYAN resides at the 7855/7857 HAZELTINE (MANUKYAN'S**
2 **RESIDENCE)**

3 34. On July 15, 2020, I reviewed the GPS pings for **MANUKYAN'S**
4 **TELEPHONE** which have been provided by T-Mobile at intervals of
5 fifteen minutes since on or about July 13, 2020 and learned the
6 following:

7 a. the GPS pings for **MANUKYAN'S TELEPHONE** often
8 correspond to geographical coordinates located within a few miles of
9 the 7855/7857 HAZELTINE, PANORAMA CITY, which is within the radius of
10 uncertainty for the pings. That is, while the pings are not located
11 at MANUKYAN'S RESIDENCE, they are consistent with the expected
12 coordinates if **MANUKYAN'S TELEPHONE** were located at MANUKYAN'S
13 RESIDENCE.

14 35. On July 15, 2020, I conducted surveillance in the vicinity of
15 the GPS pings and observed the following:

16 a. I saw MANUKYAN (identified by his driver's license
17 photograph and bank surveillance photographs) exiting the lot of
18 MANUKYAN'S RESIDENCE and entering MANUKYAN's VEHICLE, which was
19 parked on HAZELTINE AVENUE across the street from MANUKYAN'S
20 RESIDENCE. On or about July 15, 2020, I reviewed the California Law
21 Enforcement Telecommunication System database and found that
22 MANUKYAN's VEHICLE, bearing California license plate 8NAW574, was a
23 Toyota Camry 2018 last registered to MANUKYAN at a previous address.

24 b. I saw a white Buick SUV leaving the driveway of
25 MANUKYAN'S RESIDENCE bearing CA license plate 8JL281. On or about
26 July 15, 2020, I reviewed the California Law Enforcement
27 Telecommunication System database and found that the vehicle bearing
28 California license plate 8JL281 was a Buick 2019 registered to

1 MANUKYAN's ex-wife, Hasmik Zakoyan at 621 Myrtle St, Glendale,
2 California.

3 **J. MANUKYAN Withdrew Cash at ATMs Using Debit Cards in Other**
4 **Persons' Names on July 15, 2020**

5 36. Continuing on July 15, 2020, HSI Special Agents followed
6 MANUKYAN, who left MANUKYAN'S RESIDENCE driving MANUKYAN's VEHICLE,
7 and observed him stopping at four Bank of America ATMs at about the
8 following times and at the following locations:

9 a. At 10:01 - at a Bank of America ATM located at 7255
10 Woodman Ave, Van Nuys, California;

11 b. At 10:46 - at a Bank of America ATM located at 9012
12 Sepulveda Blvd, North Hills, California;

13 c. At 10:56 at a Bank of America ATM located at 8720
14 Balboa Blvd, Northridge, California

15 d. At 11:10 at a Bank of America ATM located at 17650
16 Saticoy St, Reseda, California;

17 37. On or about July 16, 2020 I spoke to Bank of America
18 Investigator Christopher Thompson and learned that MANUKYAN conducted
19 four ATM withdrawals using the following Employment Development
20 Department (EDD) benefit cards in the name of individuals other than
21 MANUKYAN to withdraw approximately \$1,000 per card at each
22 aforementioned ATM:

23 a. EDD Bank of America Debit Card account 4427 4341 8564
24 5189 held in the name of ANASTASIA ISAENKO registered at 7855
25 HAZELTINE;

26 b. EDD Bank of America Debit Card account 4427 4341 8627
27 0243 held in the name of EKATERINA RYABOVA registered at 7855
28 HAZELTINE;

1 c. EDD Bank of America Debit Card account 4427 4341 9406
2 6997 held in the name of JOVOKHIR TOPILDIEV registered at 7857
3 HAZELTINE;

4 d. EDD Bank of America Debit Card account 4427 4341 9463
5 1691 held in the name of AXYNIA KURBATOVA registered at 444
6 Devonshire lane, Glendale, California.

7 **K. HSI executes a search warrant at MANUKYAN'S RESIDENCE and**
8 **retrieves additional EDD Bank of America Debit Cards**

9 38. On July 17, 2020, the Honorable Steve Kim, United States
10 Magistrate Judge, issued a search warrant for 7855 AND 7857 HAZELTINE
11 AVENUE, PANORAMA CITY which was executed by agents on July 22, 2020.
12 During the search of MANUKYAN's personal belongings the following
13 additional EDD benefit cards were seized by HSI:

14 a. EDD Bank of America Debit Card account 4427 4341 9398
15 5437 held in the name of DAVRON MAGAMETOV registered at 7857
16 HAZELTINE;

17 b. EDD Bank of America Debit Card account 4427 4341 9002
18 7480 held in the name of PINKNEY FORD registered at 6636 Fulton Ave,
19 Van Nuys, California;

20 c. EDD Bank of America Debit Card account 4427 4341 6689
21 5449 held in the name of ARMAN MANUKYAN;

22 **L. MANUKYAN Claimed He Found on the Street EDD Cards Recovered**
23 **from His Room, But Falsely Insisted He Had Never Used Them**

24 39. On July 22, 2020, MANUKYAN told me he was collecting
25 unemployment benefits using EDD Bank of America Debit Card account
26 4427 4341 6689 5449 held in is name. When I asked him about the
27 other two cards found in his room held in the name of DAVRON
28 MAGAMETOV and PINKNEY FORD, MANUKYAN stated that he had found these
two cards in the streets and consequently decided to keep them in his

1 room. He insisted, however, that he had never used them. When
2 confronted about the ATM withdrawals of EDD Bank of America Debit
3 Cards in the names of other individuals as observed by agents during
4 the surveillance on July 15, 2020, MANUKYAN paused for a few seconds
5 and replied that he wished to talk to an attorney before answering
6 any further questions.

7 **M. MANUKYAN's Landlord Confirmed that the Unemployment**
8 **Recipients Identified by EDD Never Lived at that Residence**

9 40. Continuing on July 22, 2020, I spoke to the landlord and
10 owner of the 7855 AND 7857 HAZELTINE AVENUE, PANORAMA CITY, Edgar
11 Zakoyan, about the high number of unemployment applications filed
12 with the EDD utilizing 7855 AND 7857 HAZELTINE AVENUE, PANORAMA CITY
13 as the address of record, and showed him a list of the following
14 account holders: "Isaenko Anastasia", "Mocanu Tatiana", "Ryabova
15 Ekaterina", "Topildiev Jovokhir", "Yakutina Darya", and "Magametov
16 Davron". Zakoyan verified that none of these names identified by EDD
17 as beneficiary for unemployment benefits had ever lived at that
18 address.

19 **N. MANUKYAN is Fleeing to France**

20 41. On or about August 7, 2020 I spoke to the landlord and
21 owner of MANUKYAN'S RESIDENCE, Edgar Zakoyan, who told me that he was
22 worried for MANUKYAN since he had not seen him or heard from him for
23 a few days. Zakoyan stated that MANUKYAN's parents had reached out to
24 him asking about MANUKYAN's whereabouts as they also were not able to
25 get a hold of him. Zakoyan also stated that MANUKYAN's vehicle was
26 still parked in front of the residence and that the keys to the house
27 and MANUKYAN's vehicle were left inside of MANUKYAN's room unsecured.
28

1 42. On August 9, 2020, I received notification from the
2 National Targeting Center ("NTC") that MANUKYAN had boarded Air
3 France flight 179 from Mexico City, Mexico inbound to Paris, France
4 with a final destination of Minsk, Belarus.

5 **VI. CONCLUSION**

6 43. Based on the foregoing, there is probable cause to believe
7 MANUKYAN violated Title 18, United States Code, Sections 1344 and
8 1028A (Bank Fraud and Aggravated Identity Theft).

9
10 Attested to by the applicant in accordance
11 with the requirements of Fed. R. Crim. P. 4.1
12 by telephone on this 10th day of August,
13 2020.

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15 _____
16 UNITED STATES MAGISTRATE JUDGE
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