



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
January 2025 Grand Jury

UNITED STATES OF AMERICA,	)	CR 2:25-CR-00458-AB
	)	
Plaintiff,	)	<u>I N D I C T M E N T</u>
	)	
v.	)	[18 U.S.C. § 1344(2): Bank
	)	Fraud; 18 U.S.C. § 1956(h):
VAHE MARGARYAN,	)	Money Laundering Conspiracy;
aka "William McGrayan,"	)	18 U.S.C. § 1957:
SARKIS SARKISYAN,	)	Transactional Money
aka "Samuel Shaw," and	)	Laundering]
AKSEL MARKARYAN,	)	
aka "Axel Mark,"	)	
	)	
Defendants.	)	

The Grand Jury charges:

COUNTS ONE THROUGH TWENTY-FIVE

[18 U.S.C. §§ 1344(2), 2]

A. INTRODUCTORY ALLEGATIONS

At times relevant to this Indictment:

1 1. Defendants VAHE MARGARYAN, also known as ("aka")
2 "William McGrayan" (MCGRAYAN), SARKIS SARKISYAN, aka "Samuel
3 Shaw" (SARKISYAN), and AKSEL MARKARYAN, aka "Axel Mark"
4 (MARKARYAN), were residents of Los Angeles County, California.

5 2. Grasshopper Bank ("GB"), First Internet Bank of
6 Indiana, Byline Bank, First Citizens Bank of North Carolina,
7 Ameris Bank, and JPMorgan Chase Bank ("JPMC") were financial
8 institutions, the deposits of which were insured by the Federal
9 Deposit Insurance Corporation.

10 3. The United States Small Business Administration
11 ("SBA") guaranteed certain loans vetted and originated by
12 financial institutions pursuant to the SBA's "Preferred Lender
13 Program" ("PLP"). PLP loans were offered to small businesses or
14 individuals, seeking to buy or improve small businesses, who
15 might not be eligible for loans through normal lending channels.

16 4. Dynamic Delivery Install, Inc. ("DDI"); American Best
17 Filter, Inc. ("ABF"); Olympus AXV Solutions, Inc. ("OAS");
18 Canmar Promo Corp ("CPC"); Dynamic IT Solutions, Inc. ("DIS");
19 Mass Exclusive LLC; Prime Funding, Inc. ("Prime"); Arms of
20 Olympus LLC ("AOO"); Alpha Omega Solutions LLC ("AOS"); Hawk
21 Fleet LLC ("Hawk Fleet"); Global Dynamic IT ("GDI"); Global
22 Ultimate Management ("GUM"); Stavros Auto Group, Inc.
23 ("Stavros"); Alex Titan Solutions, Inc. ("ATS"); and Titan
24 Solutions, Inc. ("Titan") were among the group of shell
25 companies that defendant MCGRAYAN and others known and unknown
26 to the Grand Jury created and caused to be created.

1 B. THE SCHEME TO DEFRAUD

2 5. Beginning on a date unknown, but at least in or about
3 June 2020, and continuing through at least in or about January
4 2025, in Los Angeles County, within the Central District of
5 California, and elsewhere, defendants MCGRAYAN, SARKISYAN, and
6 MARKARYAN, together with others known and unknown to the Grand
7 Jury, each aiding and abetting each other, knowingly and with
8 intent to defraud, executed and attempted to execute a scheme to
9 obtain money, funds, credits, assets, and other property owned
10 by and in the custody and control of financial institutions by
11 means of material false and fraudulent pretenses,
12 representations, and promises.

13 6. The scheme to defraud operated, in substance, as
14 follows:

15 a. Defendants SARKISYAN and MARKARYAN, and others at
16 defendant MCGRAYAN's direction posed as owners and operators of
17 newly formed or dormant business entities that, in fact, were
18 merely shells that conducted no business activity. They did so,
19 knowing they had no intention to actually conduct business
20 through these shell companies.

21 b. Defendants SARKISYAN and MARKARYAN, and others at
22 defendant MCGRAYAN's direction opened bank accounts in the names
23 of such shells, including, for example, a JPMorgan Chase Bank
24 account ending in 0835 ("JPMC 0835") in the name of DDI opened
25 by defendant MARKARYAN at defendant MCGRAYAN's direction. At
26 defendant MCGRAYAN's direction, defendants SARKISYAN and
27 MARKARYAN and others who opened these accounts gave defendant

1 MCGRAYAN and other co-schemers permission to access and transact
2 business using the accounts, including by providing passcodes
3 and blank checks and by facilitating remote computer access via
4 software programs.

5 c. In order to fraudulently induce financial
6 institutions to make PLP loans to the shell companies and to
7 believe that the shell companies would use the loan proceeds to
8 purchase legitimate and ongoing business concerns, defendants
9 MCGRAYAN, SARKISYAN, and MARKARYAN, and others at defendant
10 MCGRAYAN's direction, made false statements and fabricated and
11 provided fabricated documents in connection with applications
12 for PLP loans for those shell companies, including an
13 application for a \$2.83 million PLP loan from GB to DDI. Such
14 false statements and fabricated documents included fabricated
15 bank and financial statements, phony resumes that described
16 purported extensive work histories or other qualifications, and
17 fraudulent federal income tax returns that defendants MCGRAYAN,
18 SARKISYAN, and MARKARYAN and others at defendant MCGRAYAN's
19 direction would file and cause to be filed.

20 d. As defendants MCGRAYAN, SARKISYAN, and MARKARYAN
21 knew and intended, the financial institutions would rely on
22 these false statements and fabricated documents in funding PLP
23 loans for the shell companies.

24 e. Defendants MCGRAYAN, SARKISYAN, and MARKARYAN
25 used and caused the use of such PLP loan proceeds, obtained from
26 the fraud on the financial institutions, for personal use and to
27 create the appearance of cash flow for other shell companies to

support further fraudulent applications for PLP funds. Additionally, in order to conceal the disposition of the PLP loan proceeds and the fact that they were used for purposes not authorized by the loans' terms, defendants MCGRAYAN, SARKISYAN, and MARKARYAN, and others at defendant MCGRAYAN's direction regularly layered funds, i.e., transferred the proceeds of fraudulently obtained PLP loans and other fraudulently obtained funds into and out of the shell company accounts, including by depositing checks and transferring funds from one shell company to another.

C. THE EXECUTIONS OF THE SCHEME

7. On or about the following dates, within the Central District of California and elsewhere, the defendants named below committed and willfully caused others to commit the following acts, each of which constituted an execution or attempted execution of the fraudulent scheme:

COUNT	DATE	DEFENDANT (S)	ACT
ONE	5/17/2021	MCGRAYAN	Submission to Byline Bank of Business Purchase Agreement and Joint Escrow Instructions purporting to show that OAS was purchasing the assets of ABF for \$2.6 million, in support of PLP loan for OAS
TWO	11/1/2021	MCGRAYAN	Submission to Byline Bank of fraudulent lease for office space located at 345 W. Foothill Blvd., Suite 5, Glendora, CA, in support of PLP loan for OAS

COUNT	DATE	DEFENDANT (S)	ACT
THREE	11/12/2021	MCGRAYAN	Wire transfer of \$2,139,941 proceeds of PLP loan for OAS to Bank of America account ending in 3882
FOUR	2/14/2023	MCGRAYAN SARKISYAN	Submission to GB of fraudulent federal income tax returns for defendant SARKISYAN for calendar years 2020 and 2021 in support of PLP loan for DIS
FIVE	3/7/2023	MCGRAYAN	Submission to Ameris Bank of Business Purchase Agreement and Joint Escrow Instructions purporting to show that CPC was purchasing Mass Exclusive LLC for \$2.9 million in support of PLP loan for CPC
SIX	3/7/2023	MCGRAYAN	Submission to Ameris Bank of Internal Revenue Service ("IRS") Form 4506-T permitting Ameris Bank to obtain copy of calendar years 2020 and 2021 IRS Form 1120 tax returns for CPC that (falsely) reported revenue and tax due and owing, in support of PLP loan for CPC
SEVEN	3/14/2023	MCGRAYAN	Wire transfer of loan proceeds for PLP loan for CPC of \$2,242,761 to Escrow Company 1
EIGHT	4/3/2023	MCGRAYAN SARKISYAN MARKARYAN	Submission to GB of fraudulent resume for defendant SARKISYAN in support of PLP loan for DIS

COUNT	DATE	DEFENDANT (S)	ACT
NINE	6/8/2023	MCGRAYAN SARKISYAN MARKARYAN	Submission to GB of Business Purchase Agreement and Joint Escrow Instructions purporting to show that defendant SARKISYAN, on behalf of DIS, was purchasing DDI from defendant MARKARYAN for \$3.1 million in support of PLP loan for DIS
TEN	6/13/2023	MCGRAYAN SARKISYAN MARKARYAN	Wire transfer of loan proceeds of \$2,748,546.18 from PLP loan for DIS from GB to Escrow Company 1
ELEVEN	6/14/2023	MCGRAYAN SARKISYAN MARKARYAN	Deposit of check from Escrow Company 1 to JPMC 0835 for \$3,021,606.38 comprising loan proceeds from PLP loan for DIS from GB
TWELVE	6/28/2023	MCGRAYAN SARKISYAN MARKARYAN	Online transfer of \$25,000 from JPMC 0835 to Prime
THIRTEEN	6/28/2023	MCGRAYAN SARKISYAN MARKARYAN	Online transfer of \$13,680.99 from JPMC 0835 to AOO
FOURTEEN	6/29/2023	MCGRAYAN SARKISYAN MARKARYAN	Online transfer of \$10,280.95 from JPMC 0835 to AOS
FIFTEEN	6/29/2023	MCGRAYAN SARKISYAN MARKARYAN	Online transfer of \$13,580.75 from JPMC 0835 to Hawk Fleet
SIXTEEN	11/1/2023	MCGRAYAN MARKARYAN	Submission to First Internet Bank of Indiana of Business Purchase Agreement and Joint Escrow Instructions purporting to show that defendant MARKARYAN, on behalf of GDI, was purchasing GUM for \$3.65 million in support of PLP loan for GDI

COUNT	DATE	DEFENDANT (S)	ACT
SEVENTEEN	11/1/2023	MCGRAYAN MARKARYAN	Submission to First Internet Bank of Indiana of fraudulent resume for defendant MARKARYAN in support of PLP loan for GDI
EIGHTEEN	2/23/2024	MCGRAYAN MARKARYAN	Submission to First Internet Bank of Indiana of fabricated bank statements for defendant MARKARYAN for JPMC account ending in 1343 in support of PLP loan for GDI
NINETEEN	2/23/2024	MCGRAYAN MARKARYAN	Wire transfer of \$3,497,426 in loan proceeds from PLP loan for GDI from First Internet Bank of Indiana to Escrow Company 1
TWENTY	8/29/2024	MCGRAYAN	Online request to First Internet Bank of Indiana for PLP loan of \$2,855,000 for Stavros to purchase a business to be designated
TWENTY-ONE	8/29/2024	MCGRAYAN	Submission to First Internet Bank of Indiana of fabricated bank statement for Stavros USBank account ending in 1844 in support of PLP loan for Stavros
TWENTY-TWO	10/14/2024	MCGRAYAN	Submission to First Citizens Bank of North Carolina of Business Purchase Agreement and Joint Escrow Instructions purporting to show that ATS was purchasing Titan for \$3 million in support of PLP loan for ATS
TWENTY-THREE	1/15/2025	MCGRAYAN	Submission to First Citizens Bank of North Carolina of fraudulent "Alex Titan Solutions, Inc. Business Plan 2024" in support of PLP loan for ATS

COUNT	DATE	DEFENDANT (S)	ACT
TWENTY-FOUR	1/15/2025	MCGRAYAN	Submission to First Citizens Bank of North Carolina of fraudulent "Arms of Olympus Accounts Receivable Aging Report as of October 31, 2024" in support of PLP loan for AOS
TWENTY-FIVE	1/15/2025	MCGRAYAN	Submission to First Citizens Bank of North Carolina of IRS Form 4506-T permitting First Citizens Bank of North Carolina to obtain copy of calendar year 2024 IRS Form 1120 tax return for Titan that (falsely) reported \$2.8 million in revenue and more than \$50,000 in tax due and owing, in support of PLP loan for ATS

COUNT TWENTY-SIX

[18 U.S.C. § 1956(h)]

8. The Grand Jury realleges paragraphs 1 through 4 and 6 through 7 of this Indictment here.

A. THE OBJECT OF THE CONSPIRACY

9. Beginning no later than in or about June 2020, and continuing through at least in or about January 2025, in Los Angeles County, within the Central District of California, and elsewhere, defendants MCGRAYAN, SARKISYAN, and MARKARYAN conspired with each other and others known and unknown to the Grand Jury, to knowingly and intentionally conduct financial transactions, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, and which property was, in fact, the proceeds of specified unlawful activity, namely, bank fraud, in violation of Title 18, United States Code, Section 1344(2), with the intent to conceal and disguise the nature, location, source, ownership, and control of the proceeds.

B. MANNER AND MEANS OF THE CONSPIRACY

10. The object of the conspiracy was carried out, and to be carried out, in substance, in the manner described in paragraphs 1 through 4 and 6 of this Indictment.

C. OVERT ACTS

11. On or about the following dates, in furtherance of the conspiracy and to accomplish its object, defendants MCGRAYAN, SARKISYAN, and MARKARYAN, together with others known and unknown to the Grand Jury, committed and willfully caused

1 others to commit the following overt acts, among others, within
2 the Central District of California, and elsewhere:

3 Overt Act No. 1: Deposit of GB PLP proceeds check from
4 Escrow Company 1 to JPMC 0835 on June 14, 2023.

5 Overt Act No. 2: Online wire transfer of \$43,000 to
6 Express Water Damage Restoration on June 27, 2023.

7 Overt Act No. 3: Online wire transfer of \$120,000 to As
8 Management Inc on June 28, 2023.

9 Overt Act No. 4: Online payment of \$13,690.99 to
10 Thunkked Out, Inc on June 28, 2023.

11 Overt Act No. 5: Online payment of \$12,950.99 to Art
12 Mart, Inc. on June 28, 2023.

13 Overt Act No. 6: Online payment of \$10,280.95 to AOS.
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COUNTS TWENTY-SEVEN THROUGH THIRTY-TWO

[18 U.S.C. §§ 1957(a), 2]

12. The Grand Jury realleges paragraphs 1 through 4, 6 through 7, and 11 of this Indictment here.

13. On or about the dates set forth below, in Los Angeles County, within the Central District of California, and elsewhere, defendants MCGRAYAN, SARKISYAN, and MARKARYAN, knowing that the funds involved represented the proceeds of some form of unlawful activity, each aiding and abetting the others, engaged in and willfully caused others to engage in the following monetary transactions in criminally derived property of a value greater than \$10,000, which property, in fact, was derived from specified unlawful activity, namely, bank fraud, in violation of Title 18, United States Code, Section 1344(2), as charged in Counts One through Twenty-Five of this Indictment:

COUNT	DATE	DEFENDANT(S)	MONETARY TRANSACTION
TWENTY-SEVEN	11/4/2021	MCGRAYAN	Check no. 1014 for \$55,000 to Exceed Companies from ABF Bank of America account ending in 3882, comprising proceeds of PLP loan for OAS
TWENTY-EIGHT	11/12/2021	MCGRAYAN	Check no. 1015 for \$300,600 to ABF from ABF Bank of America account ending in 3882, comprising proceeds of PLP loan for OAS
TWENTY-NINE	11/12/2021	MCGRAYAN	Check no. 1017 for \$450,500.99 to ABF from ABF Bank of America account ending in 3882, comprising proceeds of PLP loan for OAS

COUNT	DATE	DEFENDANT (S)	MONETARY TRANSACTION
THIRTY	6/28/2023	MCGRAYAN SARKISYAN MARKARYAN	Online wire transfer of \$25,000 from JPMC 0835 to Prime
THIRTY- ONE	6/28/2023	MCGRAYAN SARKISYAN MARKARYAN	Online transfer of \$13,680.99 from JPMC 0835 to AOO
THIRTY- TWO	6/29/2023	MCGRAYAN SARKISYAN MARKARYAN	Online transfer of \$10,280.95 from JPMC 0835 to AOS
THIRTY- THREE	6/29/2023	MCGRAYAN SARKISYAN MARKARYAN	Online transfer of \$13,580.75 from JPMC 0835 to Hawk Fleet

COUNTS THIRTY-FOUR THROUGH THIRTY-FIVE

[18 U.S.C. §§ 1343, 2]

14. The Grand Jury realleges paragraphs 1 through 2, 4, and 6(a) through 6(b) of this Indictment here.

A. INTRODUCTORY ALLEGATIONS

At times relevant to this Indictment:

15. The Coronavirus Aid, Relief, and Economic Security ("CARES") Act was a federal law enacted in or about March 2020 that was designed to provide emergency financial assistance to Americans suffering economic harm as a result of the COVID-19 pandemic. One form of assistance provided by the CARES Act was the authorization of United States taxpayer funds in the form of loans to small businesses for job retention and certain other expenses, through a program referred to as the Paycheck Protection Program ("PPP"). PPP loan proceeds were required to be used by the applicant business to pay certain expenses such as payroll costs, interest on mortgages, rent, and utilities.

16. In order to obtain a PPP loan, a qualifying business was required, among other things, to submit an application that required the applicant business (through its authorized representative) to acknowledge PPP program rules and make certain affirmative certifications that the applicant business would comply with all such rules to be eligible to obtain a PPP loan. Such certifications required, among other things, that the applicant affirm that "[PPP] funds will be used to retain workers and maintain payroll or make mortgage interest payments, lease payments, and utility payments," and that the "loan

1 proceeds will be used only for business-related purposes as
2 specified in the [PPP loan application]" and consistent with PPP
3 rules. The authorized representative of the applicant was also
4 required to certify that "the information provided in th[e] PPP
5 application and the information provided in all supporting
6 documents and forms is true and accurate in material respects,"
7 and that "I understand that if the funds are knowingly used for
8 unauthorized purposes, the federal government may hold me
9 legally liable, such as for charges of fraud."

10 17. A PPP loan applicant's representative was also
11 required to state, among other things, the applicant's average
12 monthly payroll expenses and number of its employees. These
13 figures were used to calculate the amount of money that the
14 business was eligible to receive under the PPP. In addition,
15 the applicant's representative was required to provide
16 documentation showing its payroll expenses and such other
17 documentation as the SBA or the lender requested.

18 18. A PPP loan application and supporting documents were
19 submitted online through a portal and processed by a
20 participating lender. The applicant's representative confirmed
21 his/her true identity through a variety of means including
22 providing personal identifying information, uploading a copy of
23 that person's driver's license and/or Social Security card,
24 and/or executing loan documents via a document authentication
25 platform such as DocuSign. If a PPP loan application was
26 approved, the participating lender would fund the PPP loan using
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1 its own funds and would wire-transfer those funds to a bank
2 account designated by the applicant.

3 19. If PPP lending criteria were followed by the lender,
4 the SBA, in turn, guaranteed the borrower's repayment in the
5 event of that borrower's default.

6 20. Under certain circumstances, PPP borrowers were
7 entitled to forgiveness of their PPP obligations. As a
8 condition of forgiveness, borrowers were required to complete a
9 "PPP Loan Forgiveness Application" on which their authorized
10 representative represented and certified that the borrower had
11 complied with all PPP rules "including the rules related to . .
12 . eligible uses of PPP loan proceeds[]" and that "[t]he
13 information provided in th[e forgiveness application was] true
14 and correct in all material respects." The forgiveness
15 application warned that "knowingly making a false statement to
16 obtain forgiveness was a federal crime, punishable by
17 imprisonment and/or a fine."

18 B. THE SCHEME TO DEFRAUD

19 21. Beginning in or about April 2021, and continuing
20 through at least in or about June 2022, in Los Angeles County,
21 within the Central District of California, and elsewhere,
22 defendant SARKISYAN, together with others known and unknown to
23 the Grand Jury, each aiding and abetting the other, knowingly
24 and with the intent to defraud, devised, participated in, and
25 executed a scheme to defraud JPMC and the SBA as to material
26 matters, and to obtain money and property from JPMC and the SBA,
27 namely, a PPP loan for Prime and forgiveness of that PPP loan,

1 by means of material false and fraudulent pretenses,
2 representations, and promises.

3 22. The scheme to defraud operated, in substance, as
4 follows:

5 a. Defendant SARKISYAN submitted to JPMC an online
6 application for a PPP loan for Prime in which defendant
7 SARKISYAN falsely and fraudulently represented, among other
8 things, that Prime was an established business whose average
9 monthly payroll was \$314,583 and that Prime had approximately 56
10 employees.

11 b. Defendant SARKISYAN fabricated and caused to be
12 fabricated and submitted to JPMC false Internal Revenue Service
13 Forms 941 (quarterly payroll tax returns) and false payroll
14 reports that purported to show that Prime had approximately 56
15 employees.

16 c. In reliance on the false statements and
17 fabricated documents defendant SARKISYAN made and submitted,
18 JPMC approved a PPP loan for Prime and JPMC electronically
19 transferred the proceeds of that loan via interstate wire into a
20 Prime bank account controlled by defendant SARKISYAN and others
21 known and unknown to the Grand Jury.

22 d. Defendant SARKISYAN used the proceeds of the PPP
23 loan for Prime for personal and other impermissible uses under
24 PPP rules.

25 e. Defendant SARKISYAN submitted to SBA an online
26 application seeking forgiveness of the PPL loan for Prime in
27 which defendant SARKISYAN falsely and fraudulently represented,

1 among other things, that Prime used the entirety of its PPP loan
2 proceeds of \$786,457, disbursed on or about April 16, 2021, for
3 Prime's business costs that were eligible for forgiveness.

4 C. USE OF THE WIRES

5 23. On or about the following dates, in Los Angeles
6 County, within the Central District of California, and
7 elsewhere, defendant SARKISYAN, together with others known and
8 unknown to the Grand Jury, for the purpose of executing the

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above-described scheme to defraud, transmitted and caused the transmission of the following wire communications in interstate commerce:

COUNT	DATE	WIRING
THIRTY-FOUR	4/14/2021	Online submission of PPP loan application to JPMC on behalf of Prime
THIRTY-FIVE	6/30/2022	Online submission of PPP Loan Forgiveness Application to JPMC on behalf of Prime

A TRUE BILL

/s/ _____
Foreperson

BILAL A. ESSAYLI
United States Attorney



CHRISTINA T. SHAY
Assistant United States Attorney
Chief, Criminal Division

KRISTEN A. WILLIAMS
Assistant United States Attorney
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MARK AVEIS
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