UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

11-20125 CR-JORDAN / McALILEY

CASE NO. _____

18 U.S.C. § 1951
18 U.S.C. § 894
18 U.S.C. § 371
8 U.S.C. § 1325(c)
18 U.S.C. § 1344
18 U.S.C. § 1957
18 U.S.C. § 554

FILED by _____ D.C.
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STEVEN M. LARIMORE
CLERK U.S. DIST. CT.
S.D. OF FLA. - FTL

UNITED STATES OF AMERICA,

Plaintiff

v.

ARAM KHRANYAN, a/k/a Aramcho,
AZIZAGA SALIMOV, a/k/a Azik, a/k/a Akhmet,
GEGAM KALASHYAN, a/k/a Gary,
KAREN SARKISSIAN, a/k/a Roma, a/k/a Roman,
a/k/a Romik,
ARMEN MKHITARYAN, a/k/a Ashot,
ANDRANIK ITCHMELYAN, a/k/a Ando, a/k/a Andoy,
MIRA SHATKHIN,
TAMMY SUMMERS, a/k/a Tatiana Achaeva,
a/k/a Tatiana Achaev, and
VLADIMIR OKUN, a/ka/ Vova, a/k/a Vovik, a/k/a Vlad,
a/k/a Volodya,

Defendants.
_____/

INDICTMENT

The Grand Jury charges that:

COUNT ONE
(18 U.S.C. § 1951)

From in or about December 9, 2009, through in or about December 24, 2009, in Miami-Dade

County, in the Southern District of Florida and elsewhere, defendants,

ARAM KHRANYAN, a/k/a Aramcho,
AZIZAGA SALIMOV, a/k/a Azik, a/k/a Akhmet,
GEGAM KALASHYAN, a/k/a Gary,
KAREN SARKISSIAN, a/k/a Roma, a/k/a Roman,
a/k/a Romik,
ARMEN MKHITARYAN, a/k/a Ashot, and
ANDRANIK ITCHMELYAN, a/k/a Ando, a/k/a Andoy,

unlawfully, willfully and knowingly, did combine, conspire, confederate and agree together and with each other and others known and unknown to the Grand Jury to obstruct, delay and affect commerce and the movement and articles and commodities in commerce by extortion, in that the defendants and their co-conspirators agreed to obtain property, that is, approximately $12,000 from Victim-1, with his consent, which consent was to be induced by the wrongful use of actual and threatened force, violence and fear.

OBJECT OF THE CONSPIRACY

1. The object of the conspiracy was for defendants to obtain funds from Victim-1 by use of physical violence and threats of physical violence.

MEANS AND METHODS OF THE CONSPIRACY

Among the means and methods by which defendants sought to accomplish the object and purpose of the conspiracy, included, among others, the following:

2. It was part of the conspiracy that defendant ARAM KHRANYAN would direct and coordinate the activities of defendants AZIZAGA SALIMOV, GEGAM KALASHYAN, KAREN SARKISSIAN, ARMEN MKHITARYAN, and ANDRANIK ITCHMELYAN and unindicted co-conspirators in the commission of the extortion of Victim-1.

3. It was part of the conspiracy that defendant ARAM KHRANYAN requested assistance from Unindicted Co-conspirator 1 in the extortion of Victim-1.

4. It was part of the conspiracy that Unindicted Co-conspirator 1 made multiple telephone calls to Victim-1, threatening him if he failed to promptly pay the debt.

5. It was part of the conspiracy that defendants made plans to meet with Victim-1 at a warehouse location in the Miami area.

OVERT ACTS

In furtherance of the conspiracy and to achieve the object and purpose thereof, at least one of the co-conspirators committed at least one of the following overt acts, among others, in the Southern District of Florida and elsewhere:

6. On or about December 9, 2009, defendant ARAM KHRANYAN in a telephone conversation told Unindicted Co-conspirator 1 that Victim-1 owed defendant AZIZAGA SALIMOV money.

7. On or about December 9, 2009, Unindicted Co-conspirator 1 in a telephone conversation spoke to Victim-1 and told Victim-1 that they had to meet to discuss something.

8. On or about December 19, 2009, Unindicted Co-conspirator 1 in a telephone conversation told Victim-1 that Victim-1 had to pay off the debt and that this was Victim-1's last chance.

9. On or about December 20, 2009, defendants ARAM KHRANYAN and AZIZAGA SALIMOV in a telephone conversation discussed how defendant AZIZAGA SALIMOV wanted to beat up Victim-1.

10. On or about December 21, 2009, defendant ARAM KHRANYAN and Unindicted Co-conspirator 1, in a telephone conversation, discussed the fact that word of this dispute reached Moscow, and Unindicted Co-conspirator 1 told defendant ARAM KHRANYAN that Victim-1 made

a mistake by calling someone in Moscow about this.

11. On December 21, 2009, defendant ARAM KHRANYAN, in a telephone conversation, suggested to defendant AZIZAGA SALIMOV to let an unindicted co-conspirator talk "nicely" to Victim-1 when Victim-1 arrived in Miami, but that unindicted co-conspirator would secretly bring Victim-1 to defendant GEGAM KALASHYAN's place and that the defendant would then stop by there "quietly."

12. On or about December 21, 2009, defendant ARAM KHRANYAN, in a telephone conversation, spoke to the unindicted co-conspirator who stated that Victim-1 was on his way to Miami and that the only reason he [the unindicted co-conspirator] would go to the airport to meet Victim-1 would be so that he could slap Victim-1, and defendant ARAM KHRANYAN told the unindicted co-conspirator that he would have his chance to slap Victim-1, just not at the airport and that Victim-1 made a big mistake by taking this issue to the highest levels of authority.

13. On or about December 22, 2009 at approximately 10:15 p.m., defendants ARAM KHRANYAN, AZIZAGA SALIMOV, GEGAM KALASHYAN, KAREN SARKISSIAN, ARMEN MKHITARYAN, ANDRANIK ITCHMELYAN and others all met at a warehouse in Miami-Dade County maintained by defendant GEGAM KALASHYAN.

14. On or about December 22, 2009 at approximately 11:59 p.m., Unindicted Co-conspirator 1, in a telephone conversation, told Victim-1 to call defendant ANDRANIK ITCHMELYAN, to go to defendant ARAM KHRANYAN and to apologize and that if Victim-1 did not apologize, he [Unindicted co-conspirator 1] was going to come to Miami, "fuck" him up and that Victim-1 could forget about returning to Los Angeles.

All in violation of Title 18, United States Code, Section 1951.

COUNT TWO
(18 U.S.C. § 894)

From in or about December 9, 2009, through in or about December 24, 2009, in Miami-Dade County, in the Southern District of Florida and elsewhere, defendants,

ARAM KHRANYAN, a/k/a Aramcho,
AZIZAGA SALIMOV, a/k/a Azik, a/k/a Akhmet,
GEGAM KALASHYAN, a/k/a Gary,
KAREN SARKISSIAN, a/k/a Roma, a/k/a Roman,
a/k/a Romik,
ARMEN MKHITARYAN, a/k/a Ashot, and
ANDRANIK ITCHMELYAN, a/k/a Ando, a/k/a Andoy,

unlawfully, willfully and knowingly, did combine, conspire, confederate and agree together and with each other and others known and unknown to the Grand Jury, to participate in the use of extortionate means within the meaning of Title 18, United States Code, Section 891(7) to collect and attempt to collect an extension of credit.

OBJECT OF THE CONSPIRACY

1. The object of the conspiracy was for defendants to obtain funds from Victim-1 by use of physical violence and threats of physical violence.

MANNER AND MEANS OF THE CONSPIRACY

Among the means and methods by which defendants sought to accomplish the object and purpose of the conspiracy, included, among others, the following:

2. Paragraphs 2 through 5 of Count One of this Indictment are re-alleged and incorporated by reference herein as a description of the Manner and Means of the Conspiracy set forth in Count Two.

OVERT ACTS

In furtherance of the conspiracy and to achieve the object and purpose thereof, at least one of the co-conspirators committed at least one of the following overt acts, among others, in the Southern District of Florida and elsewhere:

3. Paragraphs 6 through 14 of Count One of this Indictment are re-alleged and incorporated by reference herein as a description of the Overt Acts of the Conspiracy set forth in Count Two.

All in violation of Title 18, United States Code, Section 894.

COUNT THREE
18 U.S.C. § 371

From on or about July 7, 2009 and continuing up to and including the date of the return of this Indictment, in the Southern District of Florida, and elsewhere, the defendants,

ARAM KHRANYAN, a/k/a Aramcho
MIRA SHATKHIN,
TAMMY SUMMERS, a/k/a Tatiana Achaeva,
a/k/a Tatiana Achaev,
AZIZAGA SALIMOV, a/k/a Azik, a/k/a Akhmet and
~~KAREN SARKISSIAN, a/k/a Roma, a/k/a Roman,~~
a/k/a Romik,

unlawfully, willfully and knowingly, did combine, conspire, confederate and agree together and with each other and others known and unknown to the Grand Jury to commit an offense against the United States and to defraud the United States and an agency thereof, to wit, the Department of Homeland Security, U.S. Citizenship and Immigration Service (USCIS), that is, to create and maintain a sham marriage between defendants ARAM KHRANYAN and MIRA SHATKHIN for the purpose of evading provisions of the United States immigration laws, in violation of Title 8,

United States Code, Section 1325(c).

OBJECT OF THE CONSPIRACY

1. The object of the conspiracy was for defendant ARAM KHRANYAN to obtain legal status in the United States.

MEANS AND METHODS OF THE CONSPIRACY

Among the means and methods by which defendants sought to accomplish the object and purpose of the conspiracy, included, among others, the following:

2. It was part of the conspiracy that defendants ARAM KHRANYAN and MIRA SHATKHIN would apply for and be granted a marriage license in Miami-Dade County.

3. It was further part of the conspiracy that defendant MIRA SHATKHIN would file various forms and other documents with USCIS for the adjustment of immigration status of defendant ARAM KHRANYAN in the United States.

4. It was further part of the conspiracy that defendants TAMMY SUMMERS and AZIZAGA SALIMOV would provide advice to defendants ARAM KHRANYAN and MIRA SHATKHIN on the completion of the various forms and filing of other documents with USCIS and arrange for interviews with USCIS.

5. It was further part of the conspiracy that defendants MIRA SHATKHIN, TAMMY SUMMERS and others would take photographs or discuss the taking of photographs with ARAM KHRANYAN that were used or intended to be used as part of the submission to USCIS.

6. It was further part of the conspiracy that defendant TAMMY SUMMERS would accompany defendants ARAM KHRANYAN and MIRA SHATKHIN to appointments at USCIS.

7. It was further part of the conspiracy that defendants ARAM KHRANYAN and MIRA

SHATKHIN would open joint bank accounts.

OVERT ACTS

In furtherance of the conspiracy and to achieve the object and purpose thereof, at least one of the co-conspirators committed at least one of the following overt acts, among others, in the Southern District of Florida and elsewhere:

8. On or about July 10, 2009, defendants ARAM KHRANYAN and MIRA SHATKHIN were married by a Deputy Clerk of the Circuit and County Courts, Dade County, Florida.

9. On or about July 10, 2009, defendants ARAM KHRANYAN and MIRA SHATKHIN opened a joint bank account at Wachovia Bank.

10. On or about July 23, 2009, defendant TAMMY SUMMERS mailed a Federal Express envelope to USCIS in Chicago, Illinois.

11. On or about July 23, 2009, defendant ARAM KHRANYAN signed a I-485 Application to Register Permanent Residence or Adjust Status form.

12. On or about July 23, 2009, defendant MIRA SHATKHIN signed a I-130, Petition for Alien Relative form.

13. On or about October 14, 2009, defendants ARAM KHRANYAN and MIRA SHATKHIN opened a joint bank account at Chase Bank, Sunny Isles Beach, Florida.

14. On or about October 22, 2009, defendant ARAM KHRANYAN, MIRA SHATKHIN and TAMMY SUMMERS attended an interview at USCIS in Miami, Florida.

15. On or about December 10, 2009, defendant ARAM KHRANYAN and KAREN SARKISSIAN had a telephone conversation about going to the hospital to see MIRA SHATKHIN and the need to take photographs of MIRA SHATKHIN and the baby.

16. On or about March 4, 2009, defendant AZIZAGA SALIMOV scheduled an appointment with USCIS for ARAM KHRANYAN and MIRA SHATKHIN.

17. On or about March 29, 2010, defendant MIRA SHATKHIN sent by certified mail a letter to USCIS, Miami Field Office inquiring about the status of defendant ARAM KHRANYAN and stating that they had a newborn child.

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

COUNT FOUR
(8 U.S.C. § 1325(c))

On or about July 10, 2009, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

ARAM KHRANYAN, a/k/a Aramcho, and
MIRA SHATKHIN

did knowingly enter into a marriage for the purpose of evading provisions of the United States immigration laws.

All in violation of Title 8, United States Code, Section 1325(c).

COUNTS FIVE TO THIRTEEN
(18 U.S.C. § 1344 and 2)

General Allegations

At pertinent times relevant to Count Five through Count Thirteen:

1. American Express (AMEX), Bank of America, N.A. (BOA), Bloomingdales, Citigroup Management Corp. (Citibank), Discover Financial Services (Discover), GE Money Bank (GE), FIA Card Services, N.A. (FIA), JP Morgan Chase, N.A. (Chase), Target National Bank

(Target), Wachovia, N.A., and Washington Mutual N.A. (WAMU) were financial institutions, the deposits of which were insured by the Federal Deposit Insurance Corporation.

2. Home Depot Credit Services (Home Depot) was an operator of a credit card system.

MANNER AND MEANS OF THE SCHEME TO DEFRAUD

The manner and means by which defendant sought to accomplish the objects and purpose of scheme to defraud, included, among others, the following:

3. Defendant obtained numerous credit cards by falsely stating his income level, employers, and other personal information on credit card applications.

4. Defendant would then "bust out" the credit cards, that is, he incurred debts on the credit cards up to or near the respective credit limit on each card on the false and fraudulent pretense that he intended to repay those debts.

5. Defendant would make payments on some of the credit cards with checks issued on bank accounts or credit card accounts which did not contain sufficient funds for the checks to be negotiated.

6. Defendant would open bank accounts to be used for the purpose of the deposit of the funds and withdrawal of funds from the credit cards.

7. Defendant would conduct credit card transactions with collusive merchants in order to obtain goods and funds.

On or about the dates articulated below, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

KAREN SARKISSIAN, a/k/a Roma, a/k/a Roman, a/k/a Romik,

aided and abetted by others, did knowingly and with intent to defraud execute and attempt to execute a scheme and artifice to defraud a financial institution and to obtain money and property, owned by and under the custody and control of a financial institution, by means of false and fraudulent pretenses, representations, and promises as further set forth in each count below:

COUNT	DATE	EXECUTION OF SCHEME AND ARTIFICE
5	04/09/08	$17,300 balance transfer from Citibank credit card xxxx xxxx xxxx 9321
6	04/09/08	$14,986.33 charge on Citibank credit card xxxx xxxx xxxx 8610 at Interstate Collision
7	04/09/08	$7,985 charge on Citibank credit card xxxx xxxx xxxx 2937 at JNJ Hardwood Floor
8	05/09/08	$14,900 payment to Citibank credit card xxxx xxxx xxxx 8610
9	05/11/08	$7,970 payment to Citibank credit card xxxx xxxx xxxx 2937
10	05/12/08	$14,900 charge on Citibank credit card xxxx xxxx xxxx 8610 at Interstate Collision
11	05/13/08	$7,850.42 charge on Citibank credit card xxxx xxxx xxxx 2937 at Exotic Diamond & Jewelry
12	04/23/08	$12,000 convenience check from Chase xxxx xxxx xxxx 5730
13	05/12/08	$31,300 convenience check from BOA xxx xxxxx xx9888

All in violation of Title 18, United States Code, Sections 1344 and 2.

COUNTS FOURTEEN TO FIFTEEN
(18 U.S.C. §§ 1957 and 2)

1. Paragraphs 1 through 7 of Counts Five through Thirteen of this Indictment are re-alleged and incorporated by reference herein.

On or about the dates articulated below, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

KAREN SARKISSIAN, a/k/a Roma, a/k/a Roman, a/k/a Romik,

aided and abetted by others, did knowingly engage and attempt to engage in the following monetary transactions by, through or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than $10,000, as further set forth in each count below, such property having been derived from a specified unlawful activity, that is a violation of Title 18, United States Code, Section 1344.

COUNT	DATE	MONETARY TRANSACTION
14	04/18/08	$35,000 withdrawal from BOA checking account xxxxx-x5825
15	05/22/08	$15,000 withdrawal from WAMU bank account xxx-xxx740-3

All in violation of Title 18, United States Code, Sections 1957 and 2.

COUNTS SIXTEEN TO TWENTY-SIX
(18 U.S.C. § 1344 and 2)

General Allegations

At pertinent times relevant to Counts Sixteen to Twenty-Six:

1. American Express (AMEX), Bank of America, N.A. (BOA), Citibank SD N.A. (Citibank), Discover Financial Services (Discover), GE Money Bank (GE), FIA Card Services, N.A. (FIA), JP Morgan Chase , N.A. (Chase), U.S. Bank, N.A., (U.S. Bank) and Washington Mutual F.A. (WAMU) were financial institutions, the deposits of which were insured by the Federal Deposit Insurance Corporation.

MANNER AND MEANS OF THE SCHEME TO DEFRAUD

The manner and means by which defendant sought to accomplish the objects and purpose of scheme to defraud, included, among others, the following:

3. Defendant obtained numerous credit cards by falsely stating his income level, employers, and other personal information on credit card applications.

4. Defendant would then "bust out" the credit cards, that is, he incurred debts on the credit cards up to or near the respective credit limit on each card on the false and fraudulent pretense that he intended to repay those debts.

5. Defendant would make payments on some of the credit cards with checks issued on bank accounts or credit card accounts which did not contain sufficient funds for the checks to be negotiated.

6. Defendant would open bank accounts to be used for the purpose of the deposit of the funds and withdrawal of funds from the credit cards.

7. Defendant would conduct credit card transactions with collusive merchants in order to obtain goods and funds.

On or about the dates articulated below, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant

ARMEN MKHITARYAN, a/k/a Ashot,

aided and abetted by others, did knowingly and with intent to defraud execute and attempt to execute a scheme and artifice to defraud a financial institution and obtain money and property, owned by and under the custody and control of a financial institution, by means of false and fraudulent pretenses, representations, and promises as further set forth in each count below:

COUNT	DATE	EXECUTION OF SCHEME AND ARTIFICE
16	10/15/08	$24,700 convenience check from BOA credit card xxxx xxxx xxxx 0069
17	10/17/08	$4,900 banking advance from BOA credit card xxxx xxxx xxxx 0870
18	10/18/08	$18,900 banking advance from BOA credit card xxxx xxxxxx x7129
19	10/21/08	$9,950 charge on Chase credit card xxxx xxxx xxxx 7333
20	10/21/08	$3,450 charge on Citibank credit card xxxx xxxx xxxx 0972
21	10/21/08	$13,450 charge on AMEX credit card xxxx-xxxxxx-x1003 at Ginex
22	10/21/08	$5,900 charge on Chase credit card xxxx xxxx xxxx 4251 at Ginex
23	10/21/08	$8,700 charge on AMEX credit card xxxx-xxxxxx-x1009 at Ginex
24	10/24/08	$3,180 charge on U.S. Bank credit card xxxx xxxx xxxx 0533 at Ginex
25	10/24/08	Deposit of $13,000 cash advance from FIA credit card account xxx xxx 1846
26	11/05/08	$7,950 charge on Discover credit xxxx xxxx xxxx 1561 at Ginex

All in violation of Title 18, United States Code, Sections 1344 and 2.

COUNTS TWENTY-SEVEN TO TWENTY-EIGHT
(18 U.S.C. §§ 1957 and 2)

1. Paragraphs 1 through 7 of the Manner and Means section of Counts Sixteen through Twenty-Six of this Indictment are re-alleged and incorporated by reference herein.

On or about the dates articulated below, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

ARMEN MKHITARYAN, a/k/a Ashot,

aided and abetted by others, did knowingly engage and attempt to engage in the following monetary transactions by, through or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than $10,000, as further set forth in each count below, such property having been derived from a specified unlawful activity, that is a violation of Title 18, United States Code, Section 1344.

COUNT	DATE	MONETARY TRANSACTION
27	10/14/08	$20,000 deposit of WAMU official bank check to BOA bank account xxxx-x1847
28	10/28/09	Withdrawal of $24,000 from BOA bank account xxxxx-x1847

All in violation of Title 18, United States Code, Sections 1957 and 2.

COUNT TWENTY-EIGHT
(18 U.S.C. § 554)

From on or about March 29, 2009 through on or about April 16, 2009, in Miami-Dade County, in the Southern District of Florida, and elsewhere, defendant,

ANDRANIK ITCHMELYAN, a/k/a Ando, a/k/a Andoy,

did knowingly export and send from the United States to Armenia, any merchandise, article and object, that is: the following firearms: a Browning 300 Caliber Winchester rifle and a Glock Model17 semi-automatic handgun, contrary to any law and regulation of the United States, that is: Title 22, United States Code, Section 2778.

All in violation of Title 18, United States Code, Section 554.

COUNT TWENTY-NINE
(18 U.S.C. § 554)

From on or about March 29, 2009 through on or about April 16, 2009, in Miami-Dade County, in the Southern District of Florida, and elsewhere, defendant,

VLADIMIR OKUN, a/ka/ Vova, a/k/a Vovik, a/k/a Vlad, a/k/a Volodya,

did knowingly export and send from the United States to Armenia, any merchandise, article and object, that is: the following firearms: a Browning 300 Caliber Winchester rifle and a Heckler & Koch .45 caliber handgun, contrary to any law and regulation of the United States, that is: Title 22, United States Code, Section 2778.

All in violation of Title 18, United States Code, Section 554.

COUNT THIRTY
(18 U.S.C. § 554)

From on or about September 27, 2009 through on or about October 8, 2009, in Miami-Dade County, in the Southern District of Florida, and elsewhere, defendant,

VLADIMIR OKUN, a/ka/ Vova, a/k/a Vovik, a/k/a Vlad, a/k/a Volodya,

did knowingly export and send from the United States to Armenia, any merchandise, article and object, that is: the following firearms: a Heckler & Koch 9 mm handgun, a Walther .32 caliber handgun, and a Sig Sauer .223 rifle, contrary to any law and regulation of the United States, that is: Title 22, United States Code, Section 2778.

All in violation of Title 18, United States Code, Section 554.

COUNT THIRTY-ONE
(18 U.S.C. § 554)

From on or about August 23, 2009 through on or about September 8, 2009, in Miami-Dade County, in the Southern District of Florida, and elsewhere, defendant,

GEGAM KALASHYAN, a/k/a Gary,

did knowingly export and send from the United States to Armenia, any merchandise, article and object, that is: the following firearms, a Savage 5.56 rifle,, a Armalite 7.62 rifle and a Stag 50 caliber rifle, contrary to any law and regulation of the United States, that is: Title 22, United States Code, Section 2778.

All in violation of Title 18, United States Code, Section 554.

A TRUE BILL

FOREPERSON

WIFREDO A. FERRER
UNITED STATES ATTORNEY

CYNTHIA STONE
ASSISTANT UNITED STATES ATTORNEY
MARGARET HONRATH
TRIAL ATTORNEY
CRIMINAL DIVISION, ORGANIZED CRIME
AND RACKETEERING SECTION

Certified to be a true and correct copy of the document on file
Steven M. Larimore, Clerk,
U.S. District Court
Southern District of Florida
By: Deputy Clerk
Date 2-15-11