

WARRANT ISSUED

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LOS ANGELES SUPERIOR COURT

1 ROB BONTA
 Attorney General of the State of California
 2 JENNIFER EULER
 Chief Assistant Attorney General
 3 VINCENT N. BONOTTO
 Supervising Deputy Attorney General
 4 JENNIFER HOTALING
 Deputy Attorney General
 5 State Bar No. 301016
 Division of Medi-Cal Fraud & Elder Abuse
 6 2329 Gateway Oaks Drive, Suite 200
 Sacramento, CA 95833-4252
 7 Telephone: (916) 621-1829
 Email: Jennifer.Hotaling@doj.ca.gov
 8 MELISSA ROMO
 Deputy Attorney General
 9 State Bar No. 316399
 Division of Medi-Cal Fraud & Elder Abuse
 10 303 N. Glenoaks Boulevard, Suite 900
 Burbank, CA 91502-1148
 11 Telephone: (818) 288-9856
 Fax: (818) 556-2939
 12 Email: Melissa.Romo@doj.ca.gov

Attorneys for the People of the State of California

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, CENTRAL DISTRICT

17 **THE PEOPLE OF THE STATE OF**
 18 **CALIFORNIA,**
 19
 20 Plaintiff,
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 22 v.
 23 • **01 LEVON DARAKCHYAN**
 [REDACTED]
 24 • **02 ROBERTO SABIRON RUBILLAR,**
 25 **JR.** [REDACTED]
 26 • **03 LIEZYL MANIEGO RUBILLAR**
 [REDACTED]
 27 • **04 DAVID COHEN**
 [REDACTED]
 28 • **05 SARKIS KSACHIKYAN**
 [REDACTED]

Case No.: 26CJCF02098

AG Docket # LA2025301285

**FELONY COMPLAINT FOR ARREST
WARRANT**

Charges:

Count 1-8: Penal Code § 550(a)(5)
 Count 9: Penal Code § 530.5(a)
 Count 10: Penal Code § 182(a)(1)
 Count 11-38: Penal Code § 186.10(a)

Special Allegations:

Penal Code § 186.10(c)(1)(C) – Amount Laundered
 over 1 Million
 Penal Code § 186.10(c)(1)(D) – Amount Laundered
 over 2.5 Million
 Penal Code § 186.11(a)(2) – White Collar Crime
 Enhancement, Loss > \$500,000

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- 06 ROSS TARKHAN
([REDACTED])
 - 07 KAREN MOROYAN
([REDACTED])
 - 08 LEVINA NADEZHDA
([REDACTED])
 - 09 BAKHTIYOR ROZIQOV
([REDACTED])
 - 10 SHUSHANIK ARSENYAN
([REDACTED])
 - 11 OHANNES MIRZOIAN
([REDACTED])
 - 12 ADAM ZUBIRAEV
([REDACTED])
 - 13 MARTIN TONOYAN
([REDACTED])
 - 14 TIGRAN PETROSYAN
([REDACTED])
 - 15 KARINE MUKHSI-HOVEYAN
([REDACTED])
 - 16 VARDAN MKHIITARYAN
([REDACTED])
 - 17 ARAM HAKOBYAN
([REDACTED])
 - 18 DAVIT SHAHINYAN
([REDACTED])
- Defendants.

Penal Code § 1203.045 (a)- Probation Limitation
Theft > \$100,000
Penal Code §803(c) Offenses

The People of the State of California hereby allege that in the County of Los Angeles, State of California, and before the making or filing of the complaint, the above-mentioned defendants did commit the following crimes:

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COUNT 1

INSURANCE FRAUD - Penal Code § 550(a)(5)

On or about and between January 1, 2023, and December 31, 2024, defendants **LEVON DARAKCHYAN, ROBERTO SABIRON RUBILLAR, JR. and LIEZYL MANIEGO RUBILLAR** did aid, abet, solicit, conspire with another and did knowingly prepare, make and subscribe a writing, with intent to present and use it, and to allow it to be presented in support of a false and fraudulent claim, in violation of Penal Code § 550 (a)(5), a felony, in connection with Medlight Hospice, Inc.

COUNT 2

INSURANCE FRAUD - Penal Code § 550(a)(5)

On or about and between June 1, 2023, and November 30, 2024, defendants **LEVON DARAKCHYAN, ROBERTO SABIRON RUBILLAR, JR. and LIEZYL MANIEGO RUBILLAR** did aid, abet, solicit, conspire with another and did knowingly prepare, make and subscribe a writing, with intent to present and use it, and to allow it to be presented in support of a false and fraudulent claim, in violation of Penal Code § 550 (a)(5), a felony, in connection with JTN Hospice, Inc.

COUNT 3

INSURANCE FRAUD - Penal Code § 550(a)(5)

On or about and between December 1, 2023, and May 31, 2025, defendants **LEVON DARAKCHYAN, ROBERTO SABIRON RUBILLAR, JR. and LIEZYL MANIEGO RUBILLAR** did aid, abet, solicit, conspire with another and did knowingly prepare, make and subscribe a writing, with intent to present and use it, and to allow it to be presented in support of a false and fraudulent claim, in violation of Penal Code § 550 (a)(5), a felony, in connection with Beloved Hospice, Inc.

COUNT 4

INSURANCE FRAUD - Penal Code § 550(a)(5)

On or about and between December 1, 2023, and November 30, 2024, defendants **LEVON DARAKCHYAN, ROBERTO SABIRON RUBILLAR, JR. and LIEZYL MANIEGO**

1 RUBILLAR did aid, abet, solicit, conspire with another and did knowingly prepare, make and
2 subscribe a writing, with intent to present and use it, and to allow it to be presented in support of a
3 false and fraudulent claim, in violation of Penal Code §550 (a)(5), a felony, in connection with
4 Hope of LA Hospice, Inc.

5 **COUNT 5**

6 **INSURANCE FRAUD - Penal Code § 550(a)(5)**

7 On or about and between December 1, 2023, and June 30, 2024, defendants **LEVON**
8 **DARAKCHYAN, ROBERTO SABIRON RUBILLAR, JR. and LIEZYL MANIEGO**
9 **RUBILLAR** did aid, abet, solicit, conspire with another and did knowingly prepare, make and
10 subscribe a writing, with intent to present and use it, and to allow it to be presented in support of a
11 false and fraudulent claim, in violation of Penal Code § 550 (a)(5), a felony, in connection with
12 LED Hospice Care.

13 **COUNT 6**

14 **INSURANCE FRAUD - Penal Code § 550(a)(5)**

15 On or about and between March 1, 2024, and November 30, 2024, defendants **LEVON**
16 **DARAKCHYAN, ROBERTO SABIRON RUBILLAR, JR. and LIEZYL MANIEGO**
17 **RUBILLAR** did aid, abet, solicit, conspire with another and did knowingly prepare, make and
18 subscribe a writing, with intent to present and use it, and to allow it to be presented in support of a
19 false and fraudulent claim, in violation of Penal Code § 550 (a)(5), a felony, in connection with
20 Sunset Hospice & Palliative Care.

21 **COUNT 7**

22 **INSURANCE FRAUD - Penal Code § 550(a)(5)**

23 On or about and between May 1, 2024, and November 30, 2024, defendants **LEVON**
24 **DARAKCHYAN, ROBERTO SABIRON RUBILLAR, JR. and LIEZYL MANIEGO**
25 **RUBILLAR** did aid, abet, solicit, conspire with another and did knowingly prepare, make and
26 subscribe a writing, with intent to present and use it, and to allow it to be presented in support of a
27 false and fraudulent claim, in violation of Penal Code § 550 (a)(5), a felony, in connection with
28 Secure Hospice, Inc.

1 COUNT 8

2 **INSURANCE FRAUD - Penal Code § 550(a)(5)**

3 On or about and between June 1, 2024, and July 31, 2024, defendants **LEVON**
4 **DARAKCHYAN, ROBERTO SABIRON RUBILLAR, JR. and LIEZYL MANIEGO**
5 **RUBILLAR** did aid, abet, solicit, conspire with another and did knowingly prepare, make and
6 subscribe a writing, with intent to present and use it, and to allow it to be presented in support of a
7 false and fraudulent claim, in violation of Penal Code § 550 (a)(5), a felony, in connection with
8 Greenwood Healthcare, Inc. dba TC Palliative & Hospice Care.

9 COUNT 9

10 **UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION**

11 **Penal Code § 530.5(a)**

12 Beginning on or about January 1, 2023, and continuing through May 31, 2025, defendants
13 **LEVON DARAKCHYAN, ROBERTO SABIRON RUBILLAR, JR., and LIEZYL**
14 **MANIEGO RUBILLAR** did willfully and unlawfully obtain personal identifying information of
15 another and used that information for an unlawful purpose and to obtain, and attempt to obtain
16 credit, goods, services, real property, and/or medical information without the consent of the
17 person(s) whose personal identifying information was used.

18 COUNT 10

19 **CONSPIRACY TO COMMIT HEALTH INSURANCE FRAUD**

20 **Penal Code § 182(a)(1) and Penal Code § 550(a)(5)**

21 Beginning on or about January 1, 2023, and continuing through May 31, 2025, defendants
22 **LEVON DARAKCHYAN, ROBERTO SABIRON RUBILLAR, JR., LIEZYL MANIEGO**
23 **RUBILLAR, DAVID COHEN, SARKIS KSACHIKYAN, ROSS TARKHAN, KAREN**
24 **MOROYAN, LEVINA NADEZHDA, BAKHTIYOR ROZIQOV, SHUSHANIK**
25 **ARSENYAN, OHANNES MIRZOIAN, ADAM ZUBIRAEV, MARTIN TONOYAN,**
26 **TIGRAN PETROSYAN, KARINE MUKHSI-HOVEYAN, VARDAN MKHITARYAN,**
27 **ARAM HAKOBYAN, and DAVIT SHAHINYAN** did unlawfully conspire together and with
28 another person and persons whose identity may be unknown to commit the crime of Healthcare

1 Insurance Fraud, in violation of Penal Code section 550(a)(5), a felony; that pursuant to and for
2 the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said
3 defendants committed the following overt acts at and in the County of Los Angeles:

- 4 1. LEVON DARAKCHYAN communicated via iMessage using account
5 bitonyatrich@icloud.com with co-conspirator ROBERTO SABIRON RUBILLAR, JR
6 regarding logins to Hospice MD, billing, patient eligibility, and payments for submitting
7 claims to Medi-Cal for JTN Hospice, Medlight Hospice, LED Hospice, Beloved Hospice
8 Care, Hope of LA Hospice, Sunset Hospice, Secure Hospice, and Greenwood Healthcare
9 Inc. dba as TC Hospice & Palliative Hospice Care.
- 10 2. ROBERTO SABIRON RUBILLAR, JR., the Chief Executive Officer and Chief Financial
11 Officer of Legit System Billing Solutions, communicated via iMessage with an individual
12 using the account bitonyatrich@icloud.com regarding logins to Hospice MD, billing,
13 patient eligibility, and payments for submitting claims to Medi-Cal for JTN Hospice,
14 Medlight Hospice, LED Hospice, Beloved Hospice Care, Hope of LA Hospice, Sunset
15 Hospice, Secure Hospice, and Greenwood Healthcare Inc. dba as TC Hospice & Palliative
16 Hospice Care.
- 17 3. ROBERTO SABIRON RUBILLAR, JR. and LIEZYI. RUBILLAR, the Secretary of Legit
18 System Billing Solutions, submitted Medi-Cal claims on behalf of JTN Hospice, Medlight
19 Hospice, LED Hospice, Beloved Hospice Care, Hope of LA Hospice, Sunset Hospice,
20 Secure Hospice, and Greenwood Healthcare, Inc. dba TC Hospice & Palliative Care.
- 21 4. ROBERTO SABIRON RUBILLAR, JR. and LIEZYL RUBILLAR received payment for
22 the submission of Medi-Cal claims for Beloved Hospice Care, Hope of LA Hospice, JTN
23 Hospice, Medlight Hospice, and Sunset Hospice.
- 24 5. Approximately 1.8 million in Medi-Cal funds received by fraudulent hospices was
25 deposited into bank accounts held by defendant DAVID COHEN.
- 26 6. Defendant DAVID COHEN wired fraudulently obtained Medi-Cal funds to other accounts
27 held by shell companies.

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- 1 7. Approximately thirty-three million in Medi-Cal funds received by fraudulent hospices was
2 deposited into bank accounts held by defendant SARKIS KSACHIKYAN.
- 3 8. Defendant SARKIS KSACHIKYAN moved fraudulently obtained Medi-Cal funds to
4 other accounts held by shell companies.
- 5 9. Approximately two million in Medi-Cal funds received by fraudulent hospices was
6 deposited into bank accounts held by Defendant ROSS TARKHAN.
- 7 10. Defendant ROSS TARKHAN transferred fraudulently obtained Medi-Cal funds into
8 cryptocurrency accounts.
- 9 11. On September 9, 2024, September 19, 2024, and October 2, 2024, defendant KAREN
10 MOROYAN deposited State of California warrants paid to Beloved Hospice, Inc. into
11 bank accounts held in his name.
- 12 12. On April 2, 2025, April 17, 2025, and May 2, 2025, defendant LEVINA NADEZHIDA
13 deposited State of California warrants paid to LED Hospice Care into bank accounts held
14 in her name.
- 15 13. Between April 10, 2025, and July 15, 2025, defendant BAKHITIYOR ROZIQOV
16 deposited State of California warrants paid to JIN Hospice, Inc. into bank accounts held
17 in his name.
- 18 14. Between December 1, 2023, and May 31, 2025, defendant SUSHANIK ARSENYAN
19 deposited State of California warrants paid to Beloved Hospice, Inc. into bank accounts
20 held in her name.
- 21 15. Between November 15, 2024, and February 10, 2025, defendant OHANNES MIRZOIAN
22 deposited State of California warrants paid to Sunset Hospice & Palliative Care into bank
23 accounts held in his name.
- 24 16. On May 15, 2024, defendant ADAM ZUBIRAEV deposited State of California warrants
25 paid to Sunset Hospice & Palliative Care into bank accounts held in his name.
- 26 17. Between September 19, 2024, and March 31, 2025, defendant MARTIN TONROYAN
27 deposited State of California warrants paid to Greenwood Healthcare, Inc., dba TC
28 Palliative & Hospice Care, into bank accounts held in his name.

1 18. Between April 17, 2024, and April 24, 2024, defendant TIGRAN PETROSYAN
2 deposited State of California warrants paid to Hope of LA Hospice, Inc. into bank
3 accounts held in his name.

4 19. Between November 1, 2024, and December 16, 2024, defendant KARINE MUKHSI-
5 HOVEYAN deposited State of California warrants paid to Hope of LA Hospice, Inc. into
6 bank accounts held in her name.

7 20. Between September 3, 2024, and December 11, 2024, defendant VARDAN
8 MKHITARYAN deposited State of California warrants paid to Secure Hospice, Inc. into
9 bank accounts held in his name.

10 21. Between December 29, 2023, and January 11, 2024, defendant ARAM HAKOBYAN
11 deposited State of California warrants paid to Medlight Hospice into bank accounts held
12 in his name.

13 22. Between July 5, 2024, and July 25, 2024, defendant DAVIT SHAHINYAN deposited
14 State of California warrants paid to Medlight Hospice into bank accounts held in his
15 name.

16 **COUNT 11**

17 **MONEY LAUNDERING - Penal Code § 186.10(a)**

18 On February 13, 2025, defendant **DAVID COHEN** did unlawfully conduct and attempt to
19 conduct a transaction involving a monetary instrument or instruments of a value exceeding
20 \$150,000 through a financial institution with the intent to promote, manage, establish, carry on,
21 and facilitate the promotion, management, establishment, and carrying on of criminal activity, or
22 knowing that the monetary instrument represented the proceeds of, and was derived directly or
23 indirectly from the proceeds of, criminal activity, to wit: wire transfer of \$600,000 into JPMorgan
24 Chase Bank account ending 5728.

25 **COUNT 12**

26 **MONEY LAUNDERING - Penal Code § 186.10(a)**

27 On March 5, 2025, defendant **DAVID COHEN** did unlawfully conduct and attempt to
28 conduct a transaction involving a monetary instrument or instruments of a value exceeding

1 \$150,000 through a financial institution with the intent to promote, manage, establish, carry on,
2 and facilitate the promotion, management, establishment, and carrying on of criminal activity, or
3 knowing that the monetary instrument represented the proceeds of, and was derived directly or
4 indirectly from the proceeds of, criminal activity, to wit: deposit of check #3012 for \$327,119
5 into U.S. Bank account ending 7318.

6 **COUNT 13**

7 **MONEY LAUNDERING - Penal Code § 186.10(a)**

8 On March 5, 2025, defendant **DAVID COHEN** did unlawfully conduct and attempt to
9 conduct a transaction involving a monetary instrument or instruments of a value exceeding
10 \$150,000 through a financial institution with the intent to promote, manage, establish, carry on,
11 and facilitate the promotion, management, establishment, and carrying on of criminal activity, or
12 knowing that the monetary instrument represented the proceeds of, and was derived directly or
13 indirectly from the proceeds of, criminal activity, to wit: deposit of check #558 for \$441,370 into
14 Bank of America account ending 4885.

15 **COUNT 14**

16 **MONEY LAUNDERING - Penal Code § 186.10(a)**

17 On March 14, 2025, defendant **DAVID COHEN** did unlawfully conduct and attempt to
18 conduct a transaction involving a monetary instrument or instruments of a value exceeding
19 \$50,000 through a financial institution with the intent to promote, manage, establish, carry on,
20 and facilitate the promotion, management, establishment, and carrying on of criminal activity, or
21 knowing that the monetary instrument represented the proceeds of, and was derived directly or
22 indirectly from the proceeds of, criminal activity, to wit: wire transfer of \$120,000 from Bank of
23 America account ending 4885 to BlueRise Group, LLC.

24 **COUNT 13**

25 **MONEY LAUNDERING - Penal Code § 186.10(a)**

26 On March 20, 2025, defendant **DAVID COHEN** did unlawfully conduct and attempt to
27 conduct a transaction involving a monetary instrument or instruments of a value exceeding
28 \$150,000 through a financial institution with the intent to promote, manage, establish, carry on,

1 and facilitate the promotion, management, establishment, and carrying on of criminal activity, or
2 knowing that the monetary instrument represented the proceeds of, and was derived directly or
3 indirectly from the proceeds of. criminal activity, to wit: deposit of check #571 for \$441,370 into
4 U.S. Bank account ending 7318.

5 **COUNT 16**

6 **MONEY LAUNDERING - Penal Code § 186.10(a)**

7 On April 23, 2024, defendant **SARKIS KSACHIKYAN** did unlawfully conduct and
8 attempt to conduct a transaction involving a monetary instrument or instruments of a value
9 exceeding \$1,000,000 through a financial institution with the intent to promote, manage,
10 establish, carry on, and facilitate the promotion, management, establishment, and carrying on of
11 criminal activity, or knowing that the monetary instrument represented the proceeds of, and was
12 derived directly or indirectly from the proceeds of, criminal activity, to wit: check deposits
13 totaling \$1,336,530 into Premier America Credit Union account ending 8126-0500 for Orion
14 Home Health Services Inc.

15 **COUNT 17**

16 **MONEY LAUNDERING - Penal Code § 186.10(a)**

17 On May 2, 2024, defendant **SARKIS KSACHIKYAN** did unlawfully conduct and attempt
18 to conduct a transaction involving a monetary instrument or instruments of a value exceeding
19 \$150,000 through a financial institution with the intent to promote, manage, establish, carry on,
20 and facilitate the promotion, management, establishment, and carrying on of criminal activity, or
21 knowing that the monetary instrument represented the proceeds of, and was derived directly or
22 indirectly from the proceeds of, criminal activity, to wit: wire transfer of \$386,472 from Premier
23 America Credit Union account ending 8126-0500 "Orion Home Health Services Inc." to Green
24 Leopard Group LLC.

25 **COUNT 18**

26 **MONEY LAUNDERING - Penal Code § 186.10(a)**

27 On May 2, 2024, defendant **SARKIS KSACHIKYAN** did unlawfully conduct and attempt
28 to conduct a transaction involving a monetary instrument or instruments of a value exceeding

1 \$150,000 through a financial institution with the intent to promote, manage, establish, carry on,
2 and facilitate the promotion, management, establishment, and carrying on of criminal activity, or
3 knowing that the monetary instrument represented the proceeds of, and was derived directly or
4 indirectly from the proceeds of, criminal activity, to wit: wire transfer of \$375,495 from Premier
5 America Credit Union account ending 8126-0500 "Orion Home Health Services Inc" to Medical
6 Solutions B11.

7 **COUNT 19**

8 **MONEY LAUNDERING - Penal Code § 186.10(a)**

9 On May 9, 2024, defendant **SARKIS KSACHIKYAN** did unlawfully conduct and attempt
10 to conduct a transaction involving a monetary instrument or instruments of a value exceeding
11 \$150,000 through a financial institution with the intent to promote, manage, establish, carry on,
12 and facilitate the promotion, management, establishment, and carrying on of criminal activity, or
13 knowing that the monetary instrument represented the proceeds of, and was derived directly or
14 indirectly from the proceeds of, criminal activity, to wit: withdrawal of \$573,666 from Premier
15 America Credit Union account ending 8126-0500 "Orion Home Health Services Inc" by cashier's
16 check #0010540055 dated 5/9/2024.

17 **COUNT 20**

18 **MONEY LAUNDERING - Penal Code § 186.10(a)**

19 On April 23, 2024, defendant **SARKIS KSACHIKYAN** did unlawfully conduct and
20 attempt to conduct a transaction involving a monetary instrument or instruments of a value
21 exceeding \$150,000 through a financial institution with the intent to promote, manage, establish,
22 carry on, and facilitate the promotion, management, establishment, and carrying on of criminal
23 activity, or knowing that the monetary instrument represented the proceeds of, and was derived
24 directly or indirectly from the proceeds of, criminal activity, to wit: check deposits totaling
25 \$891,900 into Premier America Credit Union account ending 8131-0500 for Fortune Empire
26 I.I.C.

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COUNT 21

MONEY LAUNDERING - Penal Code § 186.10(a)

On May 6, 2024, defendant **SARKIS KSACHIKYAN** did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding \$150,000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, or knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit: check deposit totaling \$196,470 into Premier America Credit Union account ending 8131-0500 for Fortune Empire LLC.

COUNT 22

MONEY LAUNDERING - Penal Code § 186.10(a)

On May 2, 2024, defendant **SARKIS KSACHIKYAN** did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding \$150,000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, or knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit: wire transfer of \$250,000 from Premier America Credit Union account ending 8131-0500 "Fortune Empire LLC" to RC & C Management Inc.

COUNT 23

MONEY LAUNDERING - Penal Code § 186.10(a)

On May 9, 2024, defendant **SARKIS KSACHIKYAN** did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding \$150,000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, or knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit: withdrawal of \$600,000 from Premier

1 America Credit Union account ending 8131-0500 "Fortune Empire L.L.C." by cashier's check
2 #0010540057 dated 5/9/2024.

3 **COUNT 24**

4 **MONEY LAUNDERING - Penal Code § 186.10(a)**

5 On May 14, 2024, defendant **SARKIS KSACHIKYAN** did unlawfully conduct and
6 attempt to conduct a transaction involving a monetary instrument or instruments of a value
7 exceeding \$150,000 through a financial institution with the intent to promote, manage, establish,
8 carry on, and facilitate the promotion, management, establishment, and carrying on of criminal
9 activity, or knowing that the monetary instrument represented the proceeds of, and was derived
10 directly or indirectly from the proceeds of, criminal activity, to wit: electronic debit of
11 \$243,683.47 from Premier America Credit Union account ending 8131-0500 "Fortune Empire
12 LLC" to Premier America Credit Union account ending 8131-0600.

13 **COUNT 25**

14 **MONEY LAUNDERING - Penal Code § 186.10(a)**

15 On August 7, 2024, defendant **ROSS TARKHAN** did unlawfully conduct and attempt to
16 conduct a transaction involving a monetary instrument or instruments of a value exceeding
17 \$150,000 through a financial institution with the intent to promote, manage, establish, carry on,
18 and facilitate the promotion, management, establishment, and carrying on of criminal activity, or
19 knowing that the monetary instrument represented the proceeds of, and was derived directly or
20 indirectly from the proceeds of, criminal activity, to wit: deposit #2098717536 totaling
21 \$430,671.93 into JPMorgan Chase Bank account ending 9150.

22 **COUNT 26**

23 **MONEY LAUNDERING - Penal Code § 186.10(a)**

24 On August 8, 2024, defendant **ROSS TARKHAN** did unlawfully conduct and attempt to
25 conduct a transaction involving a monetary instrument or instruments of a value exceeding
26 \$150,000 through a financial institution with the intent to promote, manage, establish, carry on,
27 and facilitate the promotion, management, establishment, and carrying on of criminal activity, or
28 knowing that the monetary instrument represented the proceeds of, and was derived directly or

1 indirectly from the proceeds of, criminal activity, to wit: wire transfer of funds in the amount of
2 \$411,783 from JPMorgan Chase Bank account ending 9150 to Payward Interactive/Payward
3 Ventures, Inc.

4 **COUNT 27**

5 **MONEY LAUNDERING - Penal Code § 186.10(a)**

6 On August 14, 2024, defendant **ROSS TARKHAN** did unlawfully conduct and attempt to
7 conduct a transaction involving a monetary instrument or instruments of a value exceeding
8 \$150,000 through a financial institution with the intent to promote, manage, establish, carry on,
9 and facilitate the promotion, management, establishment, and carrying on of criminal activity, or
10 knowing that the monetary instrument represented the proceeds of, and was derived directly or
11 indirectly from the proceeds of, criminal activity, to wit: deposit #2098717592 totaling
12 \$435,009.26 into JPMorgan Chase Bank account ending 9150.

13 **COUNT 28**

14 **MONEY LAUNDERING - Penal Code § 186.10(a)**

15 On August 15, 2024, defendant **ROSS TARKHAN** did unlawfully conduct and attempt to
16 conduct a transaction involving a monetary instrument or instruments of a value exceeding
17 \$150,000 through a financial institution with the intent to promote, manage, establish, carry on,
18 and facilitate the promotion, management, establishment, and carrying on of criminal activity, or
19 knowing that the monetary instrument represented the proceeds of, and was derived directly or
20 indirectly from the proceeds of, criminal activity, to wit: wire transfer of funds in the amount of
21 \$475,000 from JPMorgan Chase Bank account ending 9150 to Payward Interactive/Payward
22 Ventures, Inc.

23 **COUNT 29**

24 **MONEY LAUNDERING - Penal Code § 186.10(a)**

25 On August 20, 2024, defendant **ROSS TARKHAN** did unlawfully conduct and attempt to
26 conduct a transaction involving a monetary instrument or instruments of a value exceeding
27 \$150,000 through a financial institution with the intent to promote, manage, establish, carry on,
28 and facilitate the promotion, management, establishment, and carrying on of criminal activity, or

1 knowing that the monetary instrument represented the proceeds of, and was derived directly or
2 indirectly from the proceeds of, criminal activity, to wit: deposit #2098717993 totaling
3 \$485,048.37 into JPMorgan Chase Bank account ending 9150.

4 **COUNT 30**

5 **MONEY LAUNDERING - Penal Code § 186.10(a)**

6 On August 21, 2024, defendant **ROSS TARKHIAN** did unlawfully conduct and attempt to
7 conduct a transaction involving a monetary instrument or instruments of a value exceeding
8 \$150,000 through a financial institution with the intent to promote, manage, establish, carry on,
9 and facilitate the promotion, management, establishment, and carrying on of criminal activity, or
10 knowing that the monetary instrument represented the proceeds of, and was derived directly or
11 indirectly from the proceeds of, criminal activity, to wit: wire transfer of funds in the amount of
12 \$496,734 from JPMorgan Chase Bank account ending 9150 to Payward Interactive/Payward
13 Ventures, Inc.

14 **COUNT 31**

15 **MONEY LAUNDERING - Penal Code § 186.10(a)**

16 On September 9, 2024, defendant **KAREN MOROYAN** did unlawfully conduct and
17 attempt to conduct a transaction involving a monetary instrument or instruments of a value
18 exceeding \$1,000,000 through a financial institution with the intent to promote, manage,
19 establish, carry on, and facilitate the promotion, management, establishment, and carrying on of
20 criminal activity, or knowing that the monetary instrument represented the proceeds of, and was
21 derived directly or indirectly from the proceeds of, criminal activity, i.e. the deposit of State of
22 California warrant number 31-351268 in the amount of \$1,059,737.52 into Wells Fargo Bank
23 account ending 2641.

24 **COUNT 32**

25 **MONEY LAUNDERING - Penal Code § 186.10(a)**

26 On September 19, 2024, defendant **KAREN MOROYAN** did unlawfully conduct and
27 attempt to conduct a transaction involving a monetary instrument or instruments of a value
28 exceeding \$1,000,000 through a financial institution with the intent to promote, manage,

1 establish, carry on, and facilitate the promotion, management, establishment, and carrying on of
2 criminal activity, or knowing that the monetary instrument represented the proceeds of, and was
3 derived directly or indirectly from the proceeds of, criminal activity, i.e. the deposit of State of
4 California warrants numbered 31-338632, 31-334466, and 31-355419 in the amounts of
5 \$504,405.34, \$772,237.01 and \$815.46, respectfully, into Wells Fargo Bank account ending
6 2641.

7 **COUNT 33**

8 **MONEY LAUNDERING - Penal Code § 186.10(a)**

9 On or about October 2, 2024, defendant **KAREN MOROYAN** did unlawfully conduct and
10 attempt to conduct a transaction involving a monetary instrument or instruments of a value
11 exceeding \$2,500,000 through a financial institution with the intent to promote, manage,
12 establish, carry on, and facilitate the promotion, management, establishment, and carrying on of
13 criminal activity, or knowing that the monetary instrument represented the proceeds of, and was
14 derived directly or indirectly from the proceeds of, criminal activity, i.e. the deposit of State of
15 California warrant number 31-363543 in the amount of \$3,158,735.08 into Wells Fargo Bank
16 account ending 2641.

17 **COUNT 34**

18 **MONEY LAUNDERING - Penal Code § 186.10(a)**

19 On April 2, 2025, defendant **LEVINA NADEZHDA** did unlawfully conduct and attempt to
20 conduct a transaction involving a monetary instrument or instruments of a value exceeding
21 \$1,000,000 through a financial institution with the intent to promote, manage, establish, carry on,
22 and facilitate the promotion, management, establishment, and carrying on of criminal activity, or
23 knowing that the monetary instrument represented the proceeds of, and was derived directly or
24 indirectly from the proceeds of, criminal activity, i.e. the deposit of State of California warrant
25 number 31-281719 in the amount of \$2,170,872.52 into U.S. Bank account ending 4521.

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COUNT 35

MONEY LAUNDERING - Penal Code § 186.10(a)

On April 17, 2025, defendant **LEVINA NADEZHDA** did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding \$2,500,000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, or knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, i.e. the deposit of State of California warrant number 31-301911 in the amount of \$3,175,483.29 into U.S. Bank account ending 4521.

COUNT 36

MONEY LAUNDERING - Penal Code § 186.10(a)

On May 2, 2025, defendant **LEVINA NADEZHDA** did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding \$2,500,000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, or knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, i.e. the deposit of State of California warrant number 31-311813 in the amount of \$2,646,516.85 into U.S. Bank account ending 4521.

COUNT 37

MONEY LAUNDERING - Penal Code § 186.10(a)

On and between April 10, 2025, and April 21, 2025, defendant **BAKHTIYOR ROZIQOV** did unlawfully conduct and attempt to conduct multiple transactions within a 30 day period involving a monetary instrument or instruments of a value exceeding \$2,500,000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, or knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit: April 10, 2025, deposit of State of California warrant 31-297864 into First Citizens Bank account ending 1930 in the amount of \$1,060,346.40, and April

1 21, 2025, deposit of State of California warrant 31-306204 into First Citizens Bank account
2 ending 1930 in the amount of \$1,888,819.35.

3 **COUNT 38**

4 **MONEY LAUNDERING - Penal Code § 186.10(a)**

5 On and between June 30, 2025, and July 15, 2025, defendant **BAKHTIYOR ROZIQOV**
6 did unlawfully conduct and attempt to conduct multiple transactions within a 30 day period
7 involving a monetary instrument or instruments of a value exceeding \$2,500,000 through a
8 financial institution with the intent to promote, manage, establish, carry on, and facilitate the
9 promotion, management, establishment, and carrying on of criminal activity, or knowing that the
10 monetary instrument represented the proceeds of, and was derived directly or indirectly from the
11 proceeds of, criminal activity, to wit: June 30, 2025, deposit of State of California warrant 31-
12 311871 into First Citizens Bank account ending 1930 in the amount of \$2,346,299.18, and July
13 15, 2025, deposit of State of California warrant 31-325894 into First Citizens Bank account
14 ending 1930 in the amount of \$1,857,818.67.

15 **SPECIAL ALLEGATIONS**

16 **Amount Laundered over \$1,000,000 – Penal Code §186.10 (c)(1)(C)**

17 As to Counts 11 through 15, it is further alleged that the financial transactions which
18 defendant DAVID COHEN did commit in violation of Penal Code section 186.10(a) exceeded
19 \$1,000,000, within the meaning of Penal Code section 186.10(c)(1)(C).

20 **Amount Laundered over \$2,500,000 – Penal Code §186.10 (c)(1)(D)**

21 As to Counts 16 through 24, it is further alleged that the financial transactions which
22 defendant SARKIS KSACHIKYAN did commit in violation of Penal Code section 186.10(a)
23 exceeded \$2,500,000, within the meaning of Penal Code section 186.10(c)(1)(D).

24 As to Counts 25 through 30, it is further alleged that the financial transactions which
25 defendant ROSS TARKHAN did commit in violation of Penal Code section 186.10(a) exceeded
26 \$2,500,000, within the meaning of Penal Code section 186.10(c)(1)(D).

27 As to Counts 31 through 33, it is further alleged that the financial transactions which
28 defendant KAREN MOROYAN did commit in violation of Penal Code section 186.10(a) exceeded

1 \$2,500,000, within the meaning of Penal Code section 186.10(c)(1)(D).

2 As to Counts 34 through 36, it is further alleged that the financial transactions which
3 defendant LEVINA NADEZHDA did commit in violation of Penal Code section 186.10(a)
4 exceeded \$2,500,000, within the meaning of Penal Code section 186.10(c)(1)(D).

5 As to Counts 37 through 38, it is further alleged that the financial transactions which
6 defendant BAKHTIYOR ROZIQOV did commit in violation of Penal Code section 186.10(a)
7 exceeded \$2,500,000, within the meaning of Penal Code section 186.10(c)(1)(D).

8 **Aggravated White Collar Crime – Loss Greater than \$500,000**

9 It is further alleged, pursuant to Penal Code §186.11(a)(2), that the offenses set forth in
10 Counts 1 through 38 are felonies, a material element of which is fraud or embezzlement, which
11 involve a pattern of related felony conduct resulting in an aggregate loss of more than Five
12 Hundred Thousand Dollars (\$500,000).

13 **Probation Limitation**

14 It is further alleged that the offenses set forth in Counts 1 through 38 are thefts of over
15 \$100,000 within the meaning of Penal Code §1203.045(a).

16 **Statute of Limitations for Penal Code §803(c) Offenses**

17 It is further alleged that the offenses alleged in Counts 1 through 8 and Counts 11 through
18 38 are described in Penal Code §803, subdivision (c), and that prosecution was commenced
19 within four years after the discovery of the commission of the offense(s), or within four years
20 after the completion of the offense, within the meaning of Penal Code §801.5.

21 **ALLEGATION OF CIRCUMSTANCES IN AGGRAVATION**

22 It is further alleged pursuant to California Penal Code §1170(b)(2) that, as to count 10,
23 defendant LEVON DARAKCHYAN induced others to participate in the commission of the crime
24 or occupied a position of leadership or dominance of other participants in its commission.

25 It is further alleged pursuant to California Penal Code §1170(b)(2) that the manner in which
26 the crimes charged in counts 1 through 38 was carried out indicates planning, sophistication, or
27 professionalism, within the meaning of California Rules of Court, rule 4.421(a)(8).

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1 It is further alleged pursuant to California Penal Code §1170(b)(2) that the crimes charged
2 in counts 1 through 38 involved an attempted or actual taking or damage of great monetary value.
3 within the meaning of California Rules of Court, rule 4.421(a)(9).

4 I declare under penalty of perjury, on information and belief, pursuant to the laws of the
5 State of California, that the foregoing is true and correct.

6 Dated: April 2, 2026

Respectfully Submitted,

7 ROB BONTA
8 Attorney General of the State of California

9 *Jennifer Hotaling*

10 JENNIFER HOTALING
11 Deputy Attorney General
12 *Attorneys for the People of the State of
California*

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14 *Melissa Romo*

15 MELISSA ROMO
16 Deputy Attorney General
17 *Attorneys for the People of the State of
California*

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, CENTRAL DISTRICT

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WARRANT OF ARREST

The People of the State of California to any peace officer of said State:

Proof by declaration under penalty of perjury having been made this day to me by Special Agent David Mastros of the California Department of Justice, and as described in the accompanying felony complaint, I find there is probable cause to believe that the following crimes have been committed by Defendant **LIEZYL MANIEGO RUBILLAR**: Conspiracy to Commit Health Insurance Fraud Penal Code § 182(a)(1), eight counts of Insurance Fraud Penal Code § 550(a)(5), and Identity Theft Penal Code § 530.5(a).

Therefore, you are commanded to arrest **LIEZYL MANIEGO RUBILLAR**, and bring said Defendant before any magistrate in Los Angeles County pursuant to sections 821, 825, 826, and 848 of the California Penal Code.

The Defendant is to be admitted to bail in the sum of: \$ 525,000

Date: 4-3-24

Time Issued: 11:00 AM



Wendy Segall

JUDGE OF THE SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES
WENDY SEGALL

FELONY COMPLAINT – ORDER HOLDING TO ANSWER
(Pen. Code, § 872)

It appearing from the evidence presented at the preliminary hearing that the following offense(s) charged in this Complaint have been committed and that there is sufficient cause to believe the defendant guilty thereof, to wit:

[REDACTED]

<u>Count</u>	<u>Charge</u>
1	Penal Code § 550(a)(5) – Insurance Fraud
2	Penal Code § 550(a)(5) – Insurance Fraud
3	Penal Code § 550(a)(5) – Insurance Fraud
4	Penal Code § 550(a)(5) – Insurance Fraud
5	Penal Code § 550(a)(5) – Insurance Fraud
6	Penal Code § 550(a)(5) – Insurance Fraud
7	Penal Code § 550(a)(5) – Insurance Fraud
8	Penal Code § 550(a)(5) – Insurance Fraud
9	Penal Code § 530.5(a) – Identity Theft
10	Penal Code § 182(a)(1) – Conspiracy
Enhancement	Penal Code § 1203.045(a) – Probation Limitation (Theft Over \$100,000)
Enhancement	Penal Code § 186.11(a)(2) – Aggravated White Collar Crime (Over \$500,000)

IT IS HEREBY ORDERED that defendant be held to answer therefore and be admitted to bail in the amount of \$ _____.

Date of arraignment in Superior Court will be _____
in Department _____ at _____ a.m./p.m.

Dated this _____ day of _____, 2026.

JUDGE OF THE SUPERIOR COURT