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9 SUPERIOR COURT OF CALIFORNIA

10 COUNTY OF LOS ANGELES
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12 **PEOPLE OF THE STATE OF CALIFORNIA,**

13 Plaintiff,

14 v.

15 **ROBERT KHATCHATRIAN,**
16 **ASMIK AROUTIOUNIAN,**
17 **NORIK YEGHISIAN,**
18 **ARMEN KAZANCHIAN,**
VAHAN MADATOVIAN,
NOUNE PASHINIAN, and
VAGHARSHAK PILOSSYAN,

19 Defendants.
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CASE No.:

**COMPLAINT FOR ARREST
WARRANT**

Count 1: PC§487

Special Alleg.: PC§1203.045

Special Alleg.: PC§12022.6(a)(1)

Special Alleg.: PC§12022.6(a)(2)

Counts: 2, 4, 6, 8, 10, 12, 14, and 16:

W&I§14107(b)(4)(a)

Count 3, 5, 7, 9, 11, 13, and 15:

PC§530.5(a)

Count 17 and 18: PC§186.10(a)(2)

21 The undersigned, upon information and belief, accuses defendants **ROBERT**
22 **KHATCHATRIAN, ASMIK AROUTIOUNIAN, NORIK YEGHISIAN, ARMEN**
23 **KAZANCHIAN, VAHAN MADATOVIAN, NOUNE PASHINIAN, and VAGHARSHAK**
24 **PILOSSYAN**, of the following crimes:

25 **COUNT 1**

26 [GRAND THEFT]

27 From o or about July 24, 2000, to on or about April 8, 2001, in the County of Los Angeles,
28 **ROBERT KHATCHATRIAN, ASMIK AROUTIOUNIAN, NORIK YEGHISIAN, ARMEN**

1 **KAZANCHIAN, VAHAN MADATOVIAN, NOUNE PASHINIAN, and VAGHARSHAK**
2 **PILOSSYAN**, State of California, defendants unlawfully took from the State of California property
3 of a value in excess of four hundred dollars (\$400), in violation of section 487, subdivision (a), of the
4 Penal Code, a felony.

5 **SPECIAL ALLEGATION**

6 [PROBATION LIMITATIONS: Penal Code §1203.045]

7 It is further alleged that in the commission of the felony charged in Count 2 that defendant,
8 **ROBERT KHATCHATRIAN, ASMIK AROUTIOUNIAN, NORIK YEGHISIAN, ARMEN**
9 **KAZANCHIAN, VAHAN MADATOVIAN, NOUNE PASHINIAN, and VAGHARSHAK**
10 **PILOSSYAN**, with the intent to do so, took a value in excess of One Hundred Thousand Dollars
11 (\$100,000), within the meaning of the Penal Code §1203.045, thereby requiring that the defendant
12 be denied probation.

13 **SPECIAL ALLEGATION**

14 [\$50,000 EXCESSIVE TAKING: Penal Code §12022.6(a)(1)]

15 It is further charged that the property taken by defendants **ROBERT KHATCHATRIAN,**
16 **ASMIK AROUTIOUNIAN, NORIK YEGHISIAN, ARMEN KAZANCHIAN, VAHAN**
17 **MADATOVIAN, NOUNE PASHINIAN, and VAGHARSHAK PILOSSYAN**, in the commission
18 of the felony charged in Count 2, which property defendant intended to take, was of a value in excess
19 of fifty thousand dollars (\$50,000), within the meaning of section 12022.6, subdivision (a)(1), of the
20 Penal Code.

21 **SPECIAL ALLEGATION**

22 [\$150,000 EXCESSIVE TAKING: Penal Code §12022.6(a)(2)]

23 It is further charged that the property taken by defendants **ROBERT KHATCHATRIAN,**
24 **ASMIK AROUTIOUNIAN, NORIK YEGHISIAN, ARMEN KAZANCHIAN, VAHAN**
25 **MADATOVIAN, NOUNE PASHINIAN, and VAGHARSHAK PILOSSYAN**, in the commission
26 of the felony charged in Count 2, which property defendant intended to take, was of a value in excess
27 of one hundred fifty thousand dollars (\$150,000), within the meaning of section 12022.6, subdivision
28 (a)(2), of the Penal Code.

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COUNT 2

[PRESENTING FALSE MEDI-CAL CLAIMS]

On or about March 1, 2001 through approximately April 7, 2001, in the County of Los Angeles, State of California, **ROBERT KHATCHATRIAN, ASMIK AROUTIOUNIAN, ARMEN KAZANCHIAN** and **NOUNE PASHINIAN** knowingly and willingly executed, a scheme to defraud the Medi-Cal program by fraudulently using the Medi-Cal beneficiary information of KNARIK T. to bill the Medi-Cal program in violation of section 14107(b)(4)(A) of the Penal Code, a felony.

COUNT 3

[IDENTITY THEFT]

Beginning in or about March 1, 2001 through approximately April 7, 2001, in the County of Los Angeles, State of California, defendants **ROBERT KHATCHATRIAN, ASMIK AROUTIOUNIAN, ARMEN KAZANCHIAN** and **NOUNE PASHINIAN**, did willfully and unlawfully obtain personal identifying information of KNARIK T., without authorization, and used that information for unlawful purpose and to obtain, or attempt to obtain, credit, goods, services, or medical information through the use of said personal identifying information, without the consent of KNARIK T., in violation of Penal Code section 530.5(a), a felony.

COUNT 4

[PRESENTING FALSE MEDI-CAL CLAIMS]

On or about March 1, 2001 through approximately April 7, 2001, in the County of Los Angeles, State of California, **ROBERT KHATCHATRIAN, ASMIK AROUTIOUNIAN, ARMEN KAZANCHIAN** and **NOUNE PASHINIAN** knowingly and willingly executed, a scheme to defraud the Medi-Cal program by fraudulently using the Medi-Cal beneficiary information of LARISA A. to bill the Medi-Cal program in violation of section 14107(b)(4)(A) of the Penal Code, a felony.

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COUNT 5

1 [IDENTITY THEFT]

2 Beginning in or about March 1, 2001 through approximately April 7, 2001, in the County of
3 Los Angeles, State of California, defendants **ROBERT KHATCHATRIAN, ASMIK**
4 **AROUTIOUNIAN, ARMEN KAZANCHIAN** and **NOUNE PASHINIAN**, did willfully and
5 unlawfully obtain personal identifying information of LARISA A., without authorization, and used
6 that information for unlawful purpose and to obtain, or attempt to obtain, credit, goods, services, or
7 medical information through the use of said personal identifying information, without the consent of
8 KNARIK T., in violation of Penal Code section 530.5(a), a felony.

9 **COUNT 6**

10 [PRESENTING FALSE MEDI-CAL CLAIMS]

11 On or about March 1, 2001 through approximately April 7, 2001, in the County of Los
12 Angeles, State of California, **ROBERT KHATCHATRIAN, ASMIK AROUTIOUNIAN, ARMEN**
13 **KAZANCHIAN** and **NOUNE PASHINIAN** knowingly and willingly executed, a scheme to defraud
14 the Medi-Cal program by fraudulently using the Medi-Cal beneficiary information of AYDENIK A.
15 to bill the Medi-Cal program in violation of section 14107(b)(4)(A) of the Penal Code, a felony.

16 **COUNT 7**

17 [IDENTITY THEFT]

18 Beginning in or about March 1, 2001 through approximately April 7, 2001, in the County of
19 Los Angeles, State of California, defendants **ROBERT KHATCHATRIAN, ASMIK**
20 **AROUTIOUNIAN, ARMEN KAZANCHIAN** and **NOUNE PASHINIAN**, did willfully and
21 unlawfully obtain personal identifying information of AYDENIK A., without authorization, and used
22 that information for unlawful purpose and to obtain, or attempt to obtain, credit, goods, services, or
23 medical information through the use of said personal identifying information, without the consent of
24 KNARIK T., in violation of Penal Code section 530.5(a), a felony.

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27 **COUNT 8**

28 [PRESENTING FALSE MEDI-CAL CLAIMS]

1 On or about March 1, 2001 through approximately April 7, 2001, in the County of Los
2 Angeles, State of California, **ROBERT KHATCHATRIAN, ASMIK AROUTIOUNIAN, AND**
3 **VAGHARSHAK PILOSSYAN** knowingly and willingly executed, a scheme to defraud the Medi-
4 Cal program by fraudulently using the Medi-Cal beneficiary information of NONA A. to bill the Medi-
5 Cal program in violation of section 14107(b)(4)(A) of the Penal Code, a felony.

6 **COUNT 9**

7 [IDENTITY THEFT]

8 Beginning in or about March 1, 2001 through approximately April 7, 2001, in the County of
9 Los Angeles, State of California, defendants **ROBERT KHATCHATRIAN, ASMIK**
10 **AROUTIOUNIAN, and VAGHARSHAK PILOSSYAN**, did willfully and unlawfully obtain
11 personal identifying information of NONA A., without authorization, and used that information for
12 unlawful purpose and to obtain, or attempt to obtain, credit, goods, services, or medical information
13 through the use of said personal identifying information, without the consent of KNARIK T., in
14 violation of Penal Code section 530.5(a), a felony.

15 **COUNT 10**

16 [PRESENTING FALSE MEDI-CAL CLAIMS]

17 On or about March 1, 2001 through approximately April 7, 2001, in the County of Los
18 Angeles, State of California, **ROBERT KHATCHATRIAN, ASMIK AROUTIOUNIAN, AND**
19 **VAGHARSHAK PILOSSYAN** knowingly and willingly executed, a scheme to defraud the Medi-
20 Cal program by fraudulently using the Medi-Cal beneficiary information of Hasmik A. to bill the Medi-
21 Cal program in violation of section 14107(b)(4)(A) of the Penal Code, a felony.

22 **COUNT 11**

23 [IDENTITY THEFT]

24 Beginning in or about March 1, 2001 through approximately April 7, 2001, in the County of
25 Los Angeles, State of California, defendants **ROBERT KHATCHATRIAN, ASMIK**
26 **AROUTIOUNIAN, and VAGHARSHAK PILOSSYAN**, did willfully and unlawfully obtain
27 personal identifying information of NONA A., without authorization, and used that information for
28 unlawful purpose and to obtain, or attempt to obtain, credit, goods, services, or medical information

1 through the use of said personal identifying information, without the consent of HASMIK M., in
2 violation of Penal Code section 530.5(a), a felony.

3 **COUNT 12**

4 [PRESENTING FALSE MEDI-CAL CLAIMS]

5 On or about March 1, 2001 through approximately April 7, 2001, in the County of Los
6 Angeles, State of California, **ROBERT KHATCHATRIAN, ASMIK AROUTIOUNIAN, AND**
7 **VAHAN MADATOVIAN** knowingly and willingly executed, a scheme to defraud the Medi-Cal
8 program by fraudulently using the Medi-Cal beneficiary information of SERGEY Y.. to bill the Medi-
9 Cal program in violation of section 14107(b)(4)(A) of the Penal Code, a felony.

10 **COUNT 13**

11 [IDENTITY THEFT]

12 Beginning in or about March 1, 2001 through approximately April 7, 2001, in the County of
13 Los Angeles, State of California, defendants **ROBERT KHATCHATRIAN, ASMIK**
14 **AROUTIOUNIAN, and VAHAN MADATOVIAN**, did willfully and unlawfully obtain personal
15 identifying information of NONA A., without authorization, and used that information for unlawful
16 purpose and to obtain, or attempt to obtain, credit, goods, services, or medical information through
17 the use of said personal identifying information, without the consent of SERGEY Y., in violation of
18 Penal Code section 530.5(a), a felony.

19 **COUNT 14**

20 [PRESENTING FALSE MEDI-CAL CLAIMS]

21 On or about March 1, 2001 through approximately April 7, 2001, in the County of Los
22 Angeles, State of California, **ROBERT KHATCHATRIAN, ASMIK AROUTIOUNIAN, AND**
23 **VAHAN MADATOVIAN** knowingly and willingly executed, a scheme to defraud the Medi-Cal
24 program by fraudulently using the Medi-Cal beneficiary information of EMMA K. to bill the Medi-Cal
25 program in violation of section 14107(b)(4)(A) of the Penal Code, a felony.

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COUNT 15

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[IDENTITY THEFT]

Beginning in or about March 1, 2001 through approximately April 7, 2001, in the County of Los Angeles, State of California, defendants **ROBERT KHATCHATRIAN, ASMIK AROUTIOUNIAN, and VAHAN MADATOVIAN**, did willfully and unlawfully obtain personal identifying information of NONA A., without authorization, and used that information for unlawful purpose and to obtain, or attempt to obtain, credit, goods, services, or medical information through the use of said personal identifying information, without the consent of EMMA K., in violation of Penal Code section 530.5(a), a felony.

COUNT 16

[PRESENTING FALSE MEDI-CAL CLAIMS]

On or about March 1, 2001 through approximately April 7, 2001, in the County of Los Angeles, State of California, **ROBERT KHATCHATRIAN, ASMIK AROUTIOUNIAN, NORIK YEGHISIAN, ARMEN KAZANCHIAN, VAHAN MADATOVIAN, NOUNE PASHINIAN, and VAGHARSHAK PILOSSYAN**, knowingly and willingly executed, in addition to the Medi-Cal fraud charged in counts 2, 4, 6, 8, 10, 12 and 14, a scheme to defraud the Medi-Cal program by fraudulently using the Medi-Cal beneficiary information to bill the Medi-Cal program in violation of section 14107(b)(4)(A) of the Penal Code, a felony.

COUNT 17

[MONEY LAUNDERING]

On or about April, 24, 2001 defendants **ROBERT KHATCHATRIAN AND NORIK YEGHISHIAN** did launder money in that they did willfully and unlawfully conduct a series of transactions involving monies from the State of California in the amount of \$26,000, which is a total value exceeding five thousand dollars within a seven day period, knowing that such monetary instrument represents the proceeds of or are derived directly or indirectly from the proceeds of criminal activity in violation of Penal Code §186.10(a)(2) a felony.

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COUNT 18

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[MONEY LAUNDERING]

On or about April, 27, 2001 defendants **ROBERT KHATCHATRIAN AND NORIK YEGHISHIAN** did launder money in that they did willfully and unlawfully conduct a series of transactions involving monies from the State of California in the amount of \$9800, which is a total value exceeding five thousand dollars within a seven day period, knowing that such monetary instrument represents the proceeds of or are derived directly or indirectly from the proceeds of criminal activity in violation of Penal Code §186.10(a)(2) a felony.

DECLARATION

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Signed at _____, California, this _____ day of _____ 2003.

Teresa Parker
Special Agent
Bureau of Medi-Cal Fraud
California Department of Justice

Preliminary hearing time estimate: 1 day
Agency: Bureau of Medi-Cal Fraud
California Department of Justice
Law Enforcement Agency No. 0132
BMFEA Docket No. LA99MC2881

1 ROBERT KHATCHATRIAN
2 Bail Recommended:
3 DOB: 4/29/55
4 CII No. CDL No. B6806363 SSN:
5 Sex: M Race: White Hair: Black Eyes: Black
6 Height: 5' 7" Weight: 180

7 ASMIK AROUTIOUNIAN
8 Bail Recommended:
9 DOB: 7/13/57
10 CII No. CDL No. B6806364 SSN:
11 Sex: F Race: White Hair: Black Eyes: Black
12 Height: 5' 7" Weight: 120

13 NORIK YEGHISIAN
14 Bail Recommended:
15 DOB: 5/24/48
16 CII No. CDL No. C0464410 SSN:
17 Sex: M Race: White Hair: Brown Eyes: Brown
18 Height: 5' 8" Weight: 190

19 ARMEN KAZANCHIAN
20 Bail Recommended:
21 DOB: 3/30/57
22 CII No. CDL No. A8511475 SSN:
23 Sex: M Race: White Hair: Black Eyes: Brown
24 Height: 5'11" Weight: 196

25 NOUNE PASHINIAN
26 Bail Recommended:
27 DOB: 8/27/61
28 CII No. CDL No. A8511476 SSN:
Sex: F Race: White Hair: Brown Eyes: Black
Height: 5' 2" Weight: 118

VAHAN MADATOVIAN
Bail Recommended:
DOB: 4/3/57
CII No. CDL No. A3172826 SSN:
Sex: M Race: White Hair: Black Eyes: Brown
Height: 5'11" Weight: 215

VAGHARSHAK PILOSSYAN
Bail Recommended:
DOB: 5/15/49
CII No. CDL No. A1122206 SSN:
Sex: M Race: White Hair: Grey Eyes: Black
Height: 5' 11" Weight: 202

HOLDING ORDER

It appearing to me that the offenses in the within complaint mentioned have been committed and that there is sufficient cause to believe that the within named **ROBERT KHATCHATRIAN** is guilty, I order that he be held to answer for the same, as follows:

<u>Count</u>	<u>Charge</u>
1	Penal Code §487(a)
Special Allegation	Penal Code §1203.045
Special Allegation	Penal Code §12022.6(a)(1)
Special Allegation	Penal Code §12022.6(a)(2)
2	Penal Code §14107(b)(4)(A)
3	Penal Code §530.5(a)
4	Penal Code §14107(b)(4)(A)
5	Penal Code §530.5(a)
6	Penal Code §14107(b)(4)(A)
7	Penal Code §530.5(a)
8	Penal Code §14107(b)(4)(a)
9	Penal Code §530.5(a)
10	Penal Code §14107(b)(4)(A)
11	Penal Code §530.5(a)
12	Penal Code §14107(b)(4)(A)
13	Penal Code §530.5(a)
14	Penal Code §14107(b)(4)(A)
15	Penal Code §530.5(a)
16	Penal Code §14107(b)(4)(A)
17	Penal Code §186.10(a)(2)
18	Penal Code §186.10(a)(2)

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1 and that he be admitted to bail in the sum of _____ dollars, and is committed to the
2 sheriff of the County of Los Angeles until he gives such bail.

3 Arraignment in Superior Court will be:

4 Date: _____ Courtroom: _____

5 Time: _____ AM / PM

6 DATED this _____ day of _____, 200_.

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MAGISTRATE

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HOLDING ORDER

It appearing to me that the offenses in the within complaint mentioned have been committed and that there is sufficient cause to believe that the within named **ASMIK AROUTIOUNIAN** is guilty, I order that he be held to answer for the same, as follows:

<u>Count</u>	<u>Charge</u>
1	Penal Code §487(a)
Special Allegation	Penal Code §1203.045
Special Allegation	Penal Code §12022.6(a)(1)
Special Allegation	Penal Code §12022.6(a)(2)
2	Penal Code §14107(b)(4)(a)
3	Penal Code §530.5(a)
4	Penal Code §14107(b)(4)(A)
5	Penal Code §530.5(a)
6	Penal Code §14107(b)(4)(A)
7	Penal Code §530.5(a)
8	Penal Code §14107(b)(4)(A)
9	Penal Code §530.5(a)
10	Penal Code §14107(b)(4)(A)
11	Penal Code §530.5(a)
12	Penal Code §14107(b)(4)(A)
13	Penal Code §530.5
14	Penal Code §14107(b)(4)(A)
15	Penal Code §530.5(a)
16	Penal Code §14107(b)(4)(A)

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1 and that he be admitted to bail in the sum of _____ dollars, and is committed to the
2 sheriff of the County of Los Angeles until he gives such bail.

3 Arraignment in Superior Court will be:

4 Date: _____ Courtroom: _____

5 Time: _____ AM / PM

6 DATED this _____ day of _____, 200_.

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HOLDING ORDER

It appearing to me that the offenses in the within complaint mentioned have been committed and that there is sufficient cause to believe that the within named **NORIK YEGHISIAN** is guilty, I order that he be held to answer for the same, as follows:

<u>Count</u>	<u>Charge</u>
1	Penal Code §487(a)
Special Allegation	Penal Code §1203.045
Special Allegation	Penal Code §12022.6(a)(1)
Special Allegation	Penal Code §12022.6(a)(2)
16	Penal Code §14107(b)(4)(A)
17	Penal Code §186.10(a)(2)
18	Penal Code §186.10(a)(2)

and that he be admitted to bail in the sum of _____ dollars, and is committed to the sheriff of the County of Los Angeles until he gives such bail.

Arraignment in Superior Court will be:

Date: _____ Courtroom: _____

Time: _____ AM / PM

DATED this _____ day of _____, 200_.

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HOLDING ORDER

It appearing to me that the offenses in the within complaint mentioned have been committed and that there is sufficient cause to believe that the within named **ARMEN KAZANCHIAN** is guilty, I order that he be held to answer for the same, as follows:

<u>Count</u>	<u>Charge</u>
1	Penal Code §487(a)
Special Allegation	Penal Code §1203.045
Special Allegation	Penal Code §12022.6(a)(1)
Special Allegation	Penal Code §12022.6(a)(2)
2	Penal Code §14107(b)(4)(A)
3	Penal Code §530.5(a)
4	Penal Code §14107(b)(4)(A)
5	Penal Code §530.5(a)
6	Penal Code §14107(b)(4)(A)
7	Penal Code §530.5(a)
16	Penal Code §14107(b)(4)(A)

and that he be admitted to bail in the sum of _____ dollars, and is committed to the sheriff of the County of Los Angeles until he gives such bail.

Arraignment in Superior Court will be:

Date: _____ Courtroom: _____

Time: _____ AM / PM

DATED this _____ day of _____, 200_.

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HOLDING ORDER

It appearing to me that the offenses in the within complaint mentioned have been committed and that there is sufficient cause to believe that the within named **VAHAN MADATOVIAN** is guilty, I order that he be held to answer for the same, as follows:

<u>Count</u>	<u>Charge</u>
1	Penal Code §487(a)
Special Allegation	Penal Code §1203.045
Special Allegation	Penal Code §12022.6(a)(1)
Special Allegation	Penal Code §12022.6(a)(2)
12	Penal Code §14107(b)(4)(A)
13	Penal Code §530.5(a)
14	Penal Code §14107(b)(4)(A)
15	Penal Code §530.5(a)
16	Penal Code §14107(b)(4)(A)

and that he be admitted to bail in the sum of _____ dollars, and is committed to the sheriff of the County of Los Angeles until he gives such bail.

Arraignment in Superior Court will be:

Date: _____ Courtroom: _____

Time: _____ AM / PM

DATED this _____ day of _____, 200__.

MAGISTRATE

1 **HOLDING ORDER**

2 It appearing to me that the offenses in the within complaint mentioned have been
3 committed and that there is sufficient cause to believe that the within named **NOUNE PASHINIAN**
4 is guilty, I order that she be held to answer for the same, as follows:

5	<u>Count</u>	<u>Charge</u>
6	1	Penal Code §487(a)
7	Special Allegation	Penal Code §1203.045
8	Special Allegation	Penal Code §12022.6(a)(1)
9	Special Allegation	Penal Code §12022.6(a)(2)
10	2	Penal Code §14107(b)(4)(A)
11	3	Penal Code §530.5(a)
12	4	Penal Code §14107(b)(4)(A)
13	5	Penal Code §530.5(a)
14	6	Penal Code §14107(b)(4)(A)
15	7	Penal Code §530.5(a)
16	16	Penal Code §14107(b)(4)(A)
17	9	Penal Code §530.5(a)
18	10	Penal Code §530.5(a)

19 and that she be admitted to bail in the sum of _____ dollars, and is committed to
20 the sheriff of the County of Los Angeles until she gives such bail.

21 Arraignment in Superior Court will be:

22 Date: _____ Courtroom: _____

23 Time: _____ AM / PM

24 DATED this ____ day of _____, 200__.

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26 MAGISTRATE

1 **HOLDING ORDER**

2 It appearing to me that the offenses in the within complaint mentioned have been
3 committed and that there is sufficient cause to believe that the within named **VAGHARSHAK**
4 **PILOSSYAN** is guilty,I order that she be held to answer for the same, as follows:

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6 <u>Count</u>	<u>Charge</u>
7 1	Penal Code §487(a)
8 Special Allegation	Penal Code §1203.045
9 Special Allegation	Penal Code §12022.6(a)(1)
10 Special Allegation	Penal Code §12022.6(a)(2)
11 8	Penal Code §14107(b)(4)(A)
12 9	Penal Code §530.5(a)
13 10	Penal Code §14107(b)(4)(A)
14 11	Penal Code §530.5(a)
15 16	Penal Code §14107(b)(4)(A)

16 and that she be admitted to bail in the sum of _____ dollars, and is committed to
17 the sheriff of the County of Los Angeles until she gives such bail.

18 Arraignment in Superior Court will be:

19 Date: _____ Courtroom: _____

20 Time: _____ AM / PM

21 DATED this ____ day of _____, 200_.

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MAGISTRATE

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