

FILED

OCT 27 2010

K. TORRE CLERK OF THE COURT  
SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF CONTRA COSTA - MARTINEZ

By S. Mena Deputy Clerk

S. MENA

SUPERIOR COURT OF CALIFORNIA  
COUNTY OF CONTRA COSTA  
WALNUT CREEK

THE PEOPLE OF THE STATE OF CALIFORNIA,

VS.

DAVID ALEX KARAPETYAN, AND  
ZHIRAYR ZAMANYAN, AND  
EDWIN HAMAZASPYAN, AND  
NAUM MINTS,

DEFENDANT(S) ./

NO. 147476-6

DA NO. C 10 002876-1

2ND AMENDED COMPLAINT -  
FELONY

- 01) PC 182(a)(1)
- 02) PC 530.5(a)
- 03) PC 530.5(a)
- 04) PC 530.5(a)
- 05) PC 530.5(a)
- 06) PC 530.5(a)
- 07) PC 530.5(a)
- 08) PC 530.5(a)
- 09) PC 530.5(a)
- 10) PC 530.5(a)
- 11) PC 530.5(a)
- 12) PC 530.5(a)
- 13) PC 530.5(a)
- 14) PC 530.5(a)
- 15) PC 530.5(a)
- 16) PC 530.5(a)
- 17) PC 530.5(a)
- 18) PC 530.5(a)
- 19) PC 530.5(a)
- 20) PC 530.5(a)
- 21) PC 530.5(a)
- 22) PC 530.5(a)
- 23) PC 530.5(a)
- 24) PC 530.5(a)
- 25) PC 530.5(a)
- 26) PC 530.5(a)
- 27) PC 530.5(a)
- 28) PC 530.5(a)
- 29) PC 530.5(a)
- 30) PC 530.5(a)
- 31) PC 530.5(a)
- 32) PC 530.5(a)
- 33) PC 530.5(a)
- 34) PC 530.5(a)
- 35) PC 530.5(a)
- 36) PC 530.5(a)
- 37) PC 530.5(a)
- 38) PC 530.5(a)
- 39) PC 530.5(a)
- 40) PC 530.5(a)
- 41) PC 530.5(a)
- 42) PC 530.5(a)
- 43) PC 530.5(a)

2ND AMENDED

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44) PC 530.5(a)  
45) PC 530.5(a)  
46) PC 530.5(a)  
47) PC 530.5(a)  
48) PC 530.5(a)  
49) PC 530.5(a)  
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67) PC 530.5(a)  
68) PC 530.5(a)  
69) PC 530.5(a)  
70) PC 530.5(a)  
71) PC 530.5(a)

W/DEF ENHANCEMENTS

The undersigned states, on information and belief, that DAVID ALEX KARAPETYAN, ZHIRAYR ZAMANYAN, EDWIN HAMAZASPYAN and NAUM MINTS, Defendant, did commit a felony, a violation of PENAL CODE SECTION 182(a)(1) (CONSPIRACY TO COMMIT CRIME), committed as follows:

On or about November 1, 2009 through February 26, 2010, at Martinez, in Contra Costa County, the Defendant, DAVID ALEX KARAPETYAN, ZHIRAYR ZAMANYAN, EDWIN HAMAZASPYAN and NAUM MINTS, did unlawfully conspire together and with PERSONS WHOSE IDENTITIES ARE UNKNOWN to commit the crime of Identity Theft and Grand Theft, a violation of section 530.5 of the Penal Code, a felony.

It is further alleged that pursuant to and for the purpose of carrying out the objects and purposes of the conspiracy, the Defendant and the other conspirators committed the following overt act and acts in Contra Costa County and in Solano County:

OVERT ACT NO. 1: On November 30, 2009 Defendant Zhirayr Zamanyan withdrew \$500.00 from the account of Hudson and Sarah George without their permission using the ATM machine located at the Bank of America, 70 Solano Square, Benicia, California.

OVERT ACT NO. 2: On February 25, 2010 Defendants David Alex Karapetyan and Zhirayr Zmanyakan drove a 2009 Cadillac Escalade to the 7-11 located at 530 Morello Avenue, Martinez, California.

OVERT ACT NO. 3: On February 25, 2010 Defendant Zhirayr Amanyan parked the Cadillac Escalade next to pump number 12.

OVERT ACT NO. 4: On February 25, 2010 Defendants David Alex Karapetyan and Zhirayr Zamanyan exited the Cadillac Escalade and approached pump number 12.

OVERT ACT NO. 5: On February 23, 2010 Defendant David Alex Karapetyan opened the pump by using a key he had in his possession.

OVERT ACT NO. 6: On February 25, 2010 Defendant David Alex Karapetyan then removed a decoy skimmer from pump number 12.

OVERT ACT NO. 7: On February 25, 2010 Defendant David Alex Karapetyan and Zhirayr Zamanyan were found in possession of a GPS device that had 7-11, 530 Morello Avenue, Martinez, California; 7-11, 3012 Howe Road, Martinez, California; 7-11, 500 Military East, Benicia, California; and 7-11, 2222 Las Positas, Livermore, California programmed in.

OVERT ACT NO. 8: On February 25, 2010 Defendant David Alex Karapetyan possessed a set of keys used to open gas pumps.

OVERT ACT NO. 9: On February 25, 2010 Defendants David Alex Karapetyan and Zhirayr Zamanyan possessed two "skimming" devices.

OVERT ACT NO. 10: On February 27, 2010 Investigators Sanjay Ramrakha of Northern California Computer Crime Task Force (NC3TF) recovered a "skimming" device from pump number 12 at the 7-11 located at 2222 Las Positas, Livermore, California.

COUNT TWO:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 8, 2009, at San Francisco, in San Francisco County, the Defendant, DAVID ALEX KARAPETYAN, did willfully and unlawfully obtain personal identifying information of Neda Nejad and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Neda Nejad.

COUNT THREE:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 9, 2009, at San Francisco and San Mateo, in San Francisco and San Mateo Counties, the Defendant, DAVID ALEX KARAPETYAN, did willfully and unlawfully obtain personal identifying information of Timothy Nelson and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Timothy Nelson.

COUNT FOUR:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 11, 2009, at San Mateo, in San Mateo County, the Defendant, DAVID ALEX KARAPETYAN, did willfully and unlawfully obtain personal identifying information of Kathy Lavezzo and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Kathy Lavezzo.

COUNT FIVE:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 11, 2009, at San Mateo, in San Mateo County, the Defendant, DAVID ALEX KARAPETYAN, did willfully and unlawfully obtain personal identifying information of Bob Hadasy and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Bob Hadasy.

COUNT SIX:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 11, 2009, at San Mateo, in San Mateo County, the Defendant, DAVID ALEX KARAPETYAN, did willfully and unlawfully obtain personal identifying information of Helen Murphy and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Helen Murphy.

COUNT SEVEN:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN and NAUM MINTS, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 11, 2009, at San Mateo, in San Mateo County, the Defendant, DAVID ALEX KARAPETYAN and NAUM MINTS, did willfully and unlawfully obtain personal identifying information of William Palma and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of William Palma.

COUNT EIGHT:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 11, 2009, at San Mateo, in San Mateo County, the Defendant, DAVID ALEX KARAPETYAN, did willfully and unlawfully obtain personal identifying information of Udayasree Kathalyan and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Udayasree Kathalyan.

COUNT NINE:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 11, 2009, at Burlingame, in San Mateo County, the Defendant, DAVID ALEX KARAPETYAN, did willfully and unlawfully obtain personal identifying information of Vivian Costello and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Vivian Costello.

COUNT TEN:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 11, 2009, at Burlingame, in San Mateo County, the Defendant, DAVID ALEX KARAPETYAN, did willfully and unlawfully obtain personal identifying information of Bruce Hubley and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Bruce Hubley.

COUNT ELEVEN:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN and NAUM MINTS, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 11, 2009, at San Mateo, in San Mateo County, the Defendant, DAVID ALEX KARAPETYAN and NAUM MINTS, did willfully and unlawfully obtain personal identifying information of Rodrigo Ramirez and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Rodrigo Ramirez.

COUNT TWELVE:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN and NAUM MINTS, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 11, 2009, at San Mateo, in San Mateo County, the Defendant, DAVID ALEX KARAPETYAN and NAUM MINTS, did willfully and unlawfully obtain personal identifying information of James Demetris and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of James Demetris.

COUNT THIRTEEN:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 12, 2009, at San Mateo and Millbrae, San Mateo County, the Defendant, DAVID ALEX KARAPETYAN, did willfully and unlawfully obtain personal identifying information of Judith Whitmere and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Judith Whitmere.

COUNT FOURTEEN:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 12, 2009, at Millbrae, in San Mateo County, the Defendant, DAVID ALEX KARAPETYAN, did willfully and unlawfully obtain personal identifying information of Kathleen Scott and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Kathleen Scott.

COUNT FIFTEEN:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 12, 2009, at San Mateo, in San Mateo County, the Defendant, DAVID ALEX KARAPETYAN, did willfully and unlawfully obtain personal identifying information of Alfred Alemagna and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Alfred Alemagna.

COUNT SIXTEEN:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 12, 2009, at San Mateo, in San Mateo County, the Defendant, DAVID ALEX KARAPETYAN, did willfully and unlawfully obtain personal identifying information of Juan Escobar III and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Juan Escobar III.



COUNT SEVENTEEN:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 12, 2009, at San Mateo, in San Mateo County, the Defendant, DAVID ALEX KARAPETYAN, did willfully and unlawfully obtain personal identifying information of Tara Fletcher and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Tara Fletcher.

COUNT EIGHTEEN:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 12, 2009, at San Mateo and San Francisco, in San Mateo and San Francisco Counties, the Defendant, DAVID ALEX KARAPETYAN, did willfully and unlawfully obtain personal identifying information of Janet Healy and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Janet Healy.

COUNT NINETEEN:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 12, 2009, at San Mateo and San Francisco, in San Mateo and San Francisco Counties, the Defendant, DAVID ALEX KARAPETYAN, did willfully and unlawfully obtain personal identifying information of Patricia Potter and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Patricia Potter.

COUNT TWENTY:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 12, 2009, at San Mateo and San Francisco, in San Mateo and San Francisco Counties, the Defendant, DAVID ALEX KARAPETYAN, did willfully and unlawfully obtain personal identifying information of Ellie Cahill and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Ellie Cahill.

COUNT TWENTY-ONE:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 13, 2009, at San Mateo and San Francisco, in San Mateo and San Francisco Counties, the Defendant, DAVID ALEX KARAPETYAN, did willfully and unlawfully obtain personal identifying information of William O'Shaughnessy and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of William O'Shaughnessy.

COUNT TWENTY-TWO:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 13, 2009, at San Mateo and San Francisco, in San Mateo and San Francisco Counties, the Defendant, DAVID ALEX KARAPETYAN, did willfully and unlawfully obtain personal identifying information of Christopher Barcklay and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Christopher Barcklay.

COUNT TWENTY-THREE:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 13, 2009, at San Francisco, in San Francisco County, the Defendant, DAVID ALEX KARAPETYAN, did willfully and unlawfully obtain personal identifying information of Lisa Mumbach and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Lisa Mumbach.

COUNT TWENTY-FOUR:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 13, 2009, at San Francisco, in San Francisco County, the Defendant, DAVID ALEX KARAPETYAN, did willfully and unlawfully obtain personal identifying information of Barbara Marinaro and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Barbara Marinaro.

COUNT TWENTY-FIVE:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 14, 2009, at San Francisco, in San Francisco County, the Defendant, DAVID ALEX KARAPETYAN, did willfully and unlawfully obtain personal identifying information of Harry Hall and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Harry Hall.

COUNT TWENTY-SIX:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 14, 2009, at San Francisco, in San Francisco County, the Defendant, DAVID ALEX KARAPETYAN, did willfully and unlawfully obtain personal identifying information of John Park and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of John Park.

COUNT TWENTY-SEVEN:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 14, 2009, at San Mateo and San Francisco, in San Mateo and San Francisco Counties, the Defendant, DAVID ALEX KARAPETYAN, did willfully and unlawfully obtain personal identifying information of Raquel Rodriguez and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Raquel Rodriguez.

COUNT TWENTY-EIGHT:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 15, 2009, at Palo Alto, in Santa Clara County, the Defendant, DAVID ALEX KARAPETYAN, did willfully and unlawfully obtain personal identifying information of Janice Klein and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Janice Klein.

COUNT TWENTY-NINE:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 15, 2009, at Palo Alto, in Santa Clara County, the Defendant, DAVID ALEX KARAPETYAN, did willfully and unlawfully obtain personal identifying information of Paul Gendotti and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Paul Gendotti.

COUNT THIRTY:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 15, 2009, at San Mateo and Palo Alto, in San Mateo and Santa Clara Counties, the Defendant, DAVID ALEX KARAPETYAN, did willfully and unlawfully obtain personal identifying information of Jennifer Maltz and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Jennifer Maltz.

COUNT THIRTY-ONE:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 15, 2009, at Palo Alto, in Santa Clara County, the Defendant, DAVID ALEX KARAPETYAN, did willfully and unlawfully obtain personal identifying information of Christopher Reid and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Christopher Reid.

COUNT THIRTY-TWO

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 17, 2009, at Sacramento, in Sacramento County, the Defendant, DAVID ALEX KARAPETYAN, did willfully and unlawfully obtain personal identifying information of Alyse Goni and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Alyse Goni.

COUNT THIRTY-THREE:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 18, 2009, at Sacramento, in Sacramento County, the Defendant, DAVID ALEX KARAPETYAN, did willfully and unlawfully obtain personal identifying information of Maria Radchenko and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Maria Radchenko.

COUNT THIRTY-FOUR:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 18, 2009, at Sacramento and San Mateo, in Sacramento and San Mateo Counties, the Defendant, DAVID ALEX KARAPETYAN, did willfully and unlawfully obtain personal identifying information of Robert Bean and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Robert Bean.

COUNT THIRTY-FIVE:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 18, 2009, at Sacramento, in Sacramento County, the Defendant, DAVID ALEX KARAPETYAN, did willfully and unlawfully obtain personal identifying information of Yvonne Walker and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Yvonne Walker.

COUNT THIRTY-SIX:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 18, 2009, at Sacramento, in Sacramento County, the Defendant, DAVID ALEX KARAPETYAN, did willfully and unlawfully obtain personal identifying information of Dorothy Dekker and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Dorothy Dekker.

COUNT THIRTY-SEVEN:

The undersigned further states, on information and belief, that DAVID ALEX KARAPETYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 21, 2009, at Sacramento, in Sacramento County, the Defendant, DAVID ALEX KARAPETYAN, did willfully and unlawfully obtain personal identifying information of Ronald Bertucelli and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Ronald Bertucelli.

COUNT THIRTY-EIGHT:

The undersigned further states, on information and belief, that EDWIN HAMAZASPYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 18, 2009, at San Mateo and Citrus Heights, in San Mateo and Sacramento Counties, the Defendant, EDWIN HAMAZASPYAN, did willfully and unlawfully obtain personal identifying information of Charles Gould Jr. and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Charles Gould Jr.

COUNT THIRTY-NINE:

The undersigned further states, on information and belief, that EDWIN HAMAZASPYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 18, 2009, at Citrus Heights, in Sacramento County, the Defendant, EDWIN HAMAZASPYAN, did willfully and unlawfully obtain personal identifying information of Carolyn Yee and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Carolyn Yee.

COUNT FORTY:

The undersigned further states, on information and belief, that ZHIRAYR ZAMANYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 11, 2009, at San Mateo, in San Mateo County, the Defendant, ZHIRAYR ZAMANYAN, did willfully and unlawfully obtain personal identifying information of Willis Morrisson and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Willis Morrisson.



COUNT FORTY-ONE:

The undersigned further states, on information and belief, that ZHIRAYR ZAMANYAN and NAUM MINTS, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 11, 2009, at San Mateo, in Contra Costa County, the Defendant, ZHIRAYR ZAMANYAN and NAUM MINTS, did willfully and unlawfully obtain personal identifying information of Bruce Parker and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Bruce Parker.

COUNT FORTY-TWO:

The undersigned further states, on information and belief, that ZHIRAYR ZAMANYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 11, 2009, at Burlingame, in San Mateo County, the Defendant, ZHIRAYR ZAMANYAN, did willfully and unlawfully obtain personal identifying information of Jeffrey Glasson and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Jeffrey Glasson.

COUNT FORTY-THREE:

The undersigned further states, on information and belief, that ZHIRAYR ZAMANYAN, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 11, 2009, at San Mateo, in San Mateo County, the Defendant, ZHIRAYR ZAMANYAN, did willfully and unlawfully obtain personal identifying information of Jeanne Hoffman and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Jeanne Hoffman.

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COUNT FORTY-FOUR:

The undersigned further states, on information and belief, that NAUM MINTS, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 11, 2009, at San Mateo, in San Mateo County, the Defendant, NAUM MINTS, did willfully and unlawfully obtain personal identifying information of Ray Verna and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Ray Verna.

COUNT FORTY-FIVE:

The undersigned further states, on information and belief, that NAUM MINTS, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 11, 2009, at San Mateo, in San Mateo County, the Defendant, NAUM MINTS, did willfully and unlawfully obtain personal identifying information of Udayasree Kathaiyan and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Udayasree Kathaiyan.

COUNT FORTY-SIX:

The undersigned further states, on information and belief, that NAUM MINTS, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 11, 2009, at San Mateo and Burlingame, in San Mateo County, the Defendant, NAUM MINTS, did willfully and unlawfully obtain personal identifying information of Judith Whitmere and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Judith Whitmere.

COUNT FORTY-SEVEN:

The undersigned further states, on information and belief, that NAUM MINTS, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 11, 2009, at Burlingame, in San Mateo County, the Defendant, NAUM MINTS, did willfully and unlawfully obtain personal identifying information of Adrian Glinchey and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Adrian Glinchey.

COUNT FORTY-EIGHT:

The undersigned further states, on information and belief, that NAUM MINTS, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 11, 2009, at San Mateo, in San Mateo County, the Defendant, NAUM MINTS, did willfully and unlawfully obtain personal identifying information of Jeanne Mousa and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Jeanne Mousa.

COUNT FORTY-NINE:

The undersigned further states, on information and belief, that NAUM MINTS, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 12, 2009, at San Mateo, in San Mateo County, the Defendant, NAUM MINTS, did willfully and unlawfully obtain personal identifying information of Brett Alcaia and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Brett Alcaia.

COUNT FIFTY:

The undersigned further states, on information and belief, that NAUM MINTS, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 12, 2009, at San Bruno, in San Mateo County, the Defendant, NAUM MINTS, did willfully and unlawfully obtain personal identifying information of Jeffrey Glasson and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Jeffrey Glasson.

COUNT FIFTY-ONE:

The undersigned further states, on information and belief, that NAUM MINTS, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 14, 2009, at San Francisco, in San Francisco County, the Defendant, NAUM MINTS, did willfully and unlawfully obtain personal identifying information of Thomas Schaffernoth and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Thomas Schaffernoth.

COUNT FIFTY-TWO:

The undersigned further states, on information and belief, that NAUM MINTS, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 14, 2009, at San Francisco, in San Francisco County, the Defendant, NAUM MINTS, did willfully and unlawfully obtain personal identifying information of Barbara Marinaro and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Barbara Marinaro.

COUNT FIFTY-THREE:

The undersigned further states, on information and belief, that NAUM MINTS, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 14, 2009, at San Mateo and San Francisco, in San Mateo and San Francisco County, the Defendant, NAUM MINTS, did willfully and unlawfully obtain personal identifying information of William O'Shaughnessy and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of William O'Shaughnessy.

COUNT FIFTY-FOUR:

The undersigned further states, on information and belief, that NAUM MINTS, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 14, 2009, at San Mateo and San Francisco, in San Mateo and San Francisco County, the Defendant, NAUM MINTS, did willfully and unlawfully obtain personal identifying information of Patricia Dowd and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Patricia Dowd.

COUNT FIFTY-FIVE:

The undersigned further states, on information and belief, that NAUM MINTS, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 15, 2009, at Milbrea, in San Mateo County, the Defendant, NAUM MINTS, did willfully and unlawfully obtain personal identifying information of Bob Hadasy and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Bob Hadasy.

COUNT FIFTY-SIX:

The undersigned further states, on information and belief, that NAUM MINTS, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 15, 2009, at Palo Alto, in Santa Clara County, the Defendant, NAUM MINTS, did willfully and unlawfully obtain personal identifying information of Pilar Wilson and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Pilar Wilson.

COUNT FIFTY-SEVEN:

The undersigned further states, on information and belief, that NAUM MINTS, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 15, 2009, at San Mateo and Los Altos, in San Mateo and Santa Clara County, the Defendant, NAUM MINTS, did willfully and unlawfully obtain personal identifying information of Kiplen Scott and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Kiplen Scott.

COUNT FIFTY-EIGHT:

The undersigned further states, on information and belief, that NAUM MINTS, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 15, 2009, at Los Altos, in Santa Clara County, the Defendant, NAUM MINTS, did willfully and unlawfully obtain personal identifying information of Maria Radchenko and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Maria Radchenko.

COUNT FIFTY-NINE:

The undersigned further states, on information and belief, that NAUM MINTS, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 17, 2009, at Sacramento, in Sacramento County, the Defendant, NAUM MINTS, did willfully and unlawfully obtain personal identifying information of Phylliss Despain and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Phylliss Despain.

COUNT SIXTY:

The undersigned further states, on information and belief, that NAUM MINTS, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 17, 2009, at Sacramento, in Sacramento County, the Defendant, NAUM MINTS, did willfully and unlawfully obtain personal identifying information of Erika Rodriguez and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Erika Rodriguez.

COUNT SIXTY-ONE:

The undersigned further states, on information and belief, that NAUM MINTS, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 17, 2009, at Sacramento, in Sacramento County, the Defendant, NAUM MINTS, did willfully and unlawfully obtain personal identifying information of Paula Colhour and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Paula Colhour.

COUNT SIXTY-TWO:

The undersigned further states, on information and belief, that NAUM MINTS, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 17, 2009, at San Mateo and Sacramento, in San Mateo and Sacramento County, the Defendant, NAUM MINTS, did willfully and unlawfully obtain personal identifying information of Aimee Brown and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Aimee Brown.

COUNT SIXTY-THREE:

The undersigned further states, on information and belief, that NAUM MINTS, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 17, 2009, at Sacramento, in Sacramento County, the Defendant, NAUM MINTS, did willfully and unlawfully obtain personal identifying information of Stephen Culp and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Stephen Culp.

COUNT SIXTY-FOUR:

The undersigned further states, on information and belief, that NAUM MINTS, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 17, 2009, at San Mateo and Sacramento, in San Mateo and Sacramento County, the Defendant, NAUM MINTS, did willfully and unlawfully obtain personal identifying information of George Dekker II and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of George Dekker II.



COUNT SIXTY-FIVE:

The undersigned further states, on information and belief, that NAUM MINTS, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 18, 2009, at San Mateo and Rancho Cordova, in San Mateo and Sacramento County, the Defendant, NAUM MINTS, did willfully and unlawfully obtain personal identifying information of Teri Handelman and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Teri Handelman.

COUNT SIXTY-SIX:

The undersigned further states, on information and belief, that NAUM MINTS, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 18, 2009, at Sacramento, in Sacramento County, the Defendant, NAUM MINTS, did willfully and unlawfully obtain personal identifying information of Richard Picchi and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Richard Picchi.

COUNT SIXTY-SEVEN:

The undersigned further states, on information and belief, that NAUM MINTS, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 18, 2009, at San Mateo and Sacramento, in San Mateo and Sacramento County, the Defendant, NAUM MINTS, did willfully and unlawfully obtain personal identifying information of Barbara Brett and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Barbara Brett.

COUNT SIXTY-EIGHT:

The undersigned further states, on information and belief, that NAUM MINTS, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 20, 2009, at San Mateo and Sacramento, in San Mateo and Sacramento County, the Defendant, NAUM MINTS, did willfully and unlawfully obtain personal identifying information of Michael Sly and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Michael Sly.

COUNT SIXTY-NINE:

The undersigned further states, on information and belief, that NAUM MINTS, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 20, 2009, at Sacramento, in Sacramento County, the Defendant, NAUM MINTS, did willfully and unlawfully obtain personal identifying information of Olden Williams Jr. and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Olden Williams Jr.

COUNT SEVENTY:

The undersigned further states, on information and belief, that NAUM MINTS, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 21, 2009, at San Mateo and Citrus Heights, in San Mateo and Sacramento County, the Defendant, NAUM MINTS, did willfully and unlawfully obtain personal identifying information of Yvonne Walker and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Yvonne Walker.

COUNT SEVENTY-ONE:

The undersigned further states, on information and belief, that NAUM MINTS, Defendant, did commit a felony, a violation of PENAL CODE SECTION 530.5(a) (IDENTITY THEFT), committed as follows:

On or about December 21, 2009, at Sacramento, in Sacramento County, the Defendant, NAUM MINTS, did willfully and unlawfully obtain personal identifying information of Harthur Flores and did unlawfully use that information to obtain and attempt to obtain credit, goods, services, real property, or medical information without the consent of Harthur Flores.

DEFENDANT ENHANCEMENT  
FELONY WITH PRIOR CALIFORNIA PRISON CONVICTION

It is further alleged, pursuant to Penal Code section 667.5(b), that prior to the commission of the offenses charged herein, on or about April 7, 2008, in the Superior Court of the State of California, in and for the County of Van Nuys, the Defendant, DAVID ALEX KARAPETYAN, was convicted of Petty Theft with Priors, a felony, in violation of Penal Code section 484/666, a crime for which the Defendant served a separate prison term, and the Defendant did not remain free for a period of five years of both prison custody and the commission of an offense resulting in a felony conviction.

DEFENDANT  
PROBATION INELIGIBILITY  
TWO PRIOR FELONY CONVICTIONS  
CALIFORNIA PRIOR CONVICTION

It is further alleged, pursuant to Penal Code section 1203(e)(4), that the Defendant, DAVID ALEX KARAPETYAN, is ineligible for probation, in that prior to the commission of the crimes, as charged above, the Defendant was convicted of the following felonies:

<u>CONVICTION DATE</u>	<u>CHARGE</u>	<u>COURT</u>
07/19/2005	PC 487(a)	Burbank Superior
04/17/2008	PC 484/666	Van Nuys Superior

DEFENDANT ENHANCEMENT  
FELONY WITH PRIOR CALIFORNIA PRISON CONVICTION

It is further alleged, pursuant to Penal Code section 667.5(b), that prior to the commission of the offenses charged herein, on or about July 2, 2007, in the Superior Court of the State of California, in and for the County of Victorville, the Defendant, ZHIRAYR ZAMANYAN, was convicted of Possession of Controlled Substance., a felony, in violation of Health and Safety Code section 11350(a), a crime for which the Defendant served a separate prison term, and the Defendant did not remain free for a period of five years of both prison custody and the commission of an offense resulting in a felony conviction.

DEFENDANT ENHANCEMENT  
FELONY WITH PRIOR CALIFORNIA PRISON CONVICTION

It is further alleged, pursuant to Penal Code section 667.5(b), that prior to the commission of the offenses charged herein, on or about February 15, 2007, in the Superior Court of the State of California, in and for the County of Los Angeles, the Defendant, ZHIRAYR ZAMANYAN, was convicted of two counts of Forging Access Card, felonies, in violation of Penal Code section 484f(a), crimes for which the Defendant served a separate prison term, and the Defendant did not remain free for a period of five years of both prison custody and the commission of an offense resulting in a felony conviction.

DEFENDANT  
PROBATION INELIGIBILITY  
TWO PRIOR FELONY CONVICTIONS  
CALIFORNIA PRIOR CONVICTION

It is further alleged, pursuant to Penal Code section 1203(e)(4), that the Defendant, ZHIRAYR ZAMANYAN, is ineligible for probation, in that prior to the commission of the crimes, as charged above, the Defendant was convicted of the following felonies:

<u>CONVICTION DATE</u>	<u>CHARGE</u>	<u>COURT</u>
05/30/2003	PC 484I(c)	Glendale Superior
07/02/2007	H&S 11350(a)	Victorville Superior
02/15/2007	PC 484f(a) x 2	Central Los Angeles Superior

2ND AMENDED

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CHARGE  
JURISDICTIONAL ALLEGATION  
OFFENSE COMMITTED IN MULTIPLE COUNTIES

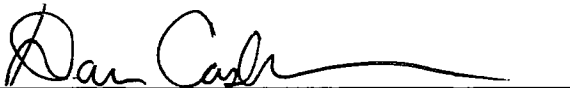
It is further alleged, pursuant to Penal Code section 781, that the above offenses were committed in part in Contra Costa County and in part in Sacramento, San Mateo, Santa Clara and San Francisco Counties.

CHARGE  
JURISDICTIONAL ALLEGATION  
STOLEN PROPERTY

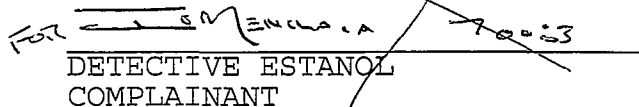
It is further alleged, pursuant to subdivision (a) of Penal Code section 786, that property taken in the above offenses were thereafter brought into Contra Costa County, and were received in Contra Costa County with the knowledge that the property had been stolen and embezzled.

COMPLAINANT REQUESTS THAT DEFENDANT(S) BE DEALT WITH ACCORDING TO LAW.  
I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

DATED: October 22, 2010 AT MARTINEZ, CALIFORNIA



BRUCE FLYNN/bs  
DEPUTY DISTRICT ATTORNEY

  
DETECTIVE ESTANOL  
COMPLAINANT

MARTINEZ POLICE DEPARTMENT