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CENTRAL DISTRICT OF CALIF.
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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
June 2019 Grand Jury

UNITED STATES OF AMERICA,
Plaintiff,
v.
VARDAN KESHISHYAN,
Defendant.

CR No. **19CR00567-PSG**
I N D I C T M E N T
[31 U.S.C. § 5324(a)(3):
Structuring of Currency
Transactions to Evade
Reporting Requirements]

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

1. At times relevant to this Indictment, Bank of America, N.A. and Wells Fargo Bank, N.A. were domestic financial institutions insured by the Federal Deposit Insurance Corporation and were required to file Currency Transaction Reports for any cash transactions in amounts greater than \$10,000.

2. At times relevant to this Indictment, defendant VARDAN KESHISHYAN was employed as a Deportation Officer for U.S. Immigration and Customs Enforcement.

1 3. On or about November 7, 2014, defendant KESHISHYAN's then-
2 wife filed for divorce in Keshishyan v. Keshishyan, Los Angeles
3 Superior Court, Case No. BD611140 (the "Divorce Case").

4 4. During the divorce, defendant KESHISHYAN and his then-wife
5 sold their home (the "Family Home"). On or about January 12, 2015,
6 defendant KESHISHYAN deposited a portion of the proceeds from the
7 sale, approximately \$96,369.22, into Bank of America Account 3730,
8 which defendant KESHISHYAN solely owned and controlled.

9 5. On or about January 23, 2015, defendant KESHISHYAN
10 transferred approximately \$80,000 from Bank of America Account 3730
11 into Bank of America Account 2973, which defendant KESHISHYAN also
12 solely owned and controlled.

13 6. From on or about January 22, 2015 to on or about February
14 20, 2015, defendant KESHISHYAN made approximately 11 cash
15 withdrawals, each of approximately \$9,000, from Bank of America
16 Account 3730 or Bank of America Account 2973. During this time
17 period, defendant KESHISHYAN's cash withdrawals totaled approximately
18 \$99,400.

19 7. On or about February 2, 2015, defendant KESHISHYAN
20 attempted to withdraw \$9,000 in cash at a Bank of America branch
21 located in Los Angeles, California. A Bank of America manager told
22 defendant KESHISHYAN that the bank was required to file Currency
23 Transaction Reports for transactions over \$10,000. The bank manager
24 provided defendant KESHISHYAN with a form that stated, among other
25 things, "federal law requires financial institutions to report
26 currency (cash or coin) transactions over \$10,000." The form also
27 warned that it is a "crime to break up transactions into small
28 amounts (also known as 'structuring') for the purpose of evading the

1 [Currency Transaction Report] reporting requirement." The bank
2 manager told defendant KESHISHYAN that, in light of the
3 circumstances, a Currency Transaction Report would need to be filed.

4 8. On or about February 2, 2015, upon hearing that a Currency
5 Transaction Report would need to be filed, defendant KESHISHYAN
6 cancelled the transaction. That same day, defendant KESHISHYAN went
7 to a different Bank of America branch located in Glendale, California
8 and withdrew \$9,000 in cash.

9 9. On or about June 15, 2015, defendant KESHISHYAN appeared in
10 Los Angeles Superior Court and was placed under oath for a hearing in
11 the Divorce Case. During the hearing, the court inquired as to why
12 defendant KESHISHYAN's "asset list" did not reflect the proceeds from
13 the sale of the Family Home. While under oath, defendant KESHISHYAN
14 falsely told the court that, of the \$96,369.22 he had received in
15 proceeds from the sale of the Family Home, he had lost approximately
16 \$95,000, at least in part through a bad investment, and only had
17 approximately \$1,000 remaining.

18 10. On or about June 15, 2015, during the hearing in the
19 Divorce Case, the court also told defendant KESHISHYAN that the
20 government "investigate[s]" repeated withdrawals of cash and warned
21 defendant KESHISHYAN that transactions above \$10,000 generate an
22 "automatic notification."

23 11. On or about August 18, 2016, defendant KESHISHYAN and his
24 then-wife reached an agreement regarding the terms of their divorce
25 settlement during a hearing in the Divorce Case.

26 12. On or about August 19, 2016, defendant KESHISHYAN deposited
27 approximately \$9,000 in cash into Bank of America Account 2973.

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1 13. On or about December 22, 2016, the final judgment of
2 dissolution of marriage was entered in the Divorce Case. One of the
3 terms of the judgment stated that, except as otherwise noted, "all
4 property in either party's current possession (including all debts
5 thereon) and all accounts and debts in a party's name, shall be
6 confirmed to that party."

7 14. From on or about January 17, 2017 to on or about January
8 24, 2017, defendant KESHISHYAN made approximately 10 cash deposits,
9 each of approximately \$9,000, into Bank of America Account 7726 or
10 Wells Fargo Bank Account 0363, both of which defendant KESHISHYAN
11 solely owned and controlled. During this time period, plus the cash
12 deposit on or about August 19, 2016, defendant KESHISHYAN's cash
13 deposits totaled approximately \$99,000.

14 15. These Introductory Allegations are incorporated into each
15 count of this Indictment.

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COUNT ONE

[31 U.S.C. § 5324(a)(3)]

On or about the following dates, in Los Angeles County, within the Central District of California, and elsewhere, defendant VARDAN KESHISHYAN, knowingly and for the purpose of evading the reporting requirements of Section 5313(a) of Title 31, United States Code, and the regulations promulgated thereunder, structured the following financial transaction, namely, through approximately 11 cash withdrawals, with a domestic financial institution:

WITHDRAWAL DATE	BANK ACCOUNT	AMOUNT OF CASH WITHDRAWALS
01/22/2015	Bank of America Account 3730	\$9,000
01/26/2015	Bank of America Account 2973	\$9,000
01/27/2015	Bank of America Account 2973	\$9,000
01/30/2015	Bank of America Account 2973	\$9,000
02/02/2015	Bank of America Account 2973	\$9,000
02/04/2015	Bank of America Account 2973	\$9,000
02/06/2015	Bank of America Account 2973	\$9,100
02/09/2015	Bank of America Account 2973	\$9,300
02/13/2015	Bank of America Account 2973	\$9,000
02/17/2015	Bank of America Account 2973	\$9,000
02/20/2015	Bank of America Account 3730	\$9,000
TOTAL AMOUNT STRUCTURED:		\$99,400

COUNT TWO

[31 U.S.C. § 5324(a)(3)]

On or about the following dates, in Los Angeles County, within the Central District of California, and elsewhere, defendant VARDAN KESHISHYAN, knowingly and for the purpose of evading the reporting requirements of Section 5313(a) of Title 31, United States Code, and the regulations promulgated thereunder, structured the following financial transaction, namely, through approximately 11 cash deposits, with domestic financial institutions:

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DEPOSIT DATE	BANK ACCOUNT	AMOUNT OF CASH DEPOSITS
08/19/2016	Bank of America Account 2973	\$9,000
01/17/2017	Bank of America Account 7726	\$9,000
01/17/2017	Wells Fargo Bank Account 0363	\$9,000
01/18/2017	Bank of America Account 7726	\$9,000
01/18/2017	Wells Fargo Bank Account 0363	\$9,000
01/20/2017	Wells Fargo Bank Account 0363	\$9,000
01/20/2017	Bank of America Account 7726	\$9,000
01/21/2017	Bank of America Account 7726	\$9,000
01/21/2017	Wells Fargo Bank Account 0363	\$9,000
01/24/2017	Wells Fargo Bank Account 0363	\$9,000
01/24/2017	Bank of America Account 7726	\$9,000
TOTAL AMOUNT STRUCTURED:		\$99,000

A TRUE BILL

/s/

Foreperson

NICOLA T. HANNA
United States Attorney

Brandon Fox

BRANDON D. FOX
Assistant United States Attorney
Chief, Criminal Division

MACK E. JENKINS
Assistant United States Attorney
Chief, Public Corruption
and Civil Rights Section

DANIEL J. O'BRIEN
Assistant United States Attorney
Deputy Chief, Public Corruption
and Civil Rights Section

LINDSEY GREER DOTSON
Assistant United States Attorney
Public Corruption
and Civil Rights Section