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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
SANTA ANA
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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

September 2011 Grand Jury

SACR 12-0145

12 UNITED STATES OF AMERICA,)

SA CR N 22

13 Plaintiff,)

I N D I C T M E N T

14 v.)

[18 U.S.C. § 371: Conspiracy to Transport for Prostitution; 8 U.S.C. § 1324(a)(2)(B)(ii): Bringing Illegal Aliens for Private Financial Gain]

15 MHER HAKOPYAN,)
aka "Mike Akopyan,")

16 ALLA KASSIANOVA,)
aka "Ala,")

17 aka "Elly," and)
NATALYA MURAVYEVA,)

18 Defendants.)
19 _____)
20

21 The Grand Jury charges:

22 COUNT ONE

23 [18 U.S.C. § 371]

24 **A. OBJECT OF THE CONSPIRACY**

25 Beginning on a date unknown to the Grand Jury and continuing
26 until on or about June 18, 2012, in Orange and Los Angeles
27 Counties, within the Central District of California, and
28 elsewhere, defendants MHER HAKOPYAN ("HAKOPYAN"), also known as

1 ("aka") "Mike Akopyan," ALLA KASSIANOVA ("KASSIANOVA"), aka
2 "Ala," aka "Elly," NATALYA MURAVYEVA ("MURAVYEVA"), and others
3 known and unknown to the Grand Jury, conspired and agreed with
4 each other to knowingly transport an individual in interstate or
5 foreign commerce, with intent that such individual engage in
6 prostitution, or in any sexual activity for which any person can
7 be charged with a criminal offense, in violation of Title 18,
8 United States Code, Section 2421.

9 **B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE**
10 **ACCOMPLISHED**

11 The object of the conspiracy was to be accomplished, in
12 substance, as follows:

13 1. Defendants HAKOPYAN, KASSIANOVA, and MURAVYEVA arranged
14 for Eastern European nationals to enter the United States and
15 engage in prostitution in Los Angeles and Orange Counties.

16 2. Defendant HAKOPYAN recruited Eastern European nationals
17 to employ in his prostitution organization via the internet and
18 through various Eastern European recruiters.

19 3. Defendants HAKOPYAN, KASSIANOVA, and MURAVYEVA assisted
20 the Eastern European nationals in applying for permission to
21 enter the United States through the Visa Waiver Program ("VWP")
22 and provided information to be submitted to the online United
23 States Department of Homeland Security, Electronic System for
24 Travel Authorization ("ESTA").

25 4. Defendants HAKOPYAN, KASSIANOVA, and MURAVYEVA
26 purchased airline tickets in Los Angeles, California for the
27 Eastern European nationals to travel to the United States to
28 engage in prostitution.

1 5. Defendants HAKOPYAN, KASSIANOVA, and MURAVYEVA arranged
2 for housing of the Eastern European nationals in the Central
3 District of California.

4 6. Defendants HAKOPYAN, KASSIANOVA, and MURAVYEVA arranged
5 for professional photographs to be taken of the Eastern European
6 nationals in provocative clothing and partially nude.

7 7. Defendants HAKOPYAN, KASSIANOVA, and MURAVYEVA arranged
8 for and placed advertisements on the internet to promote
9 prostitution.

10 8. Defendants HAKOPYAN and KASSIANOVA provided cellular
11 telephones with telephone numbers that were listed in the
12 internet advertisements to the Eastern European nationals in
13 order to arrange for clients to meet with the Eastern European
14 nationals for the purpose of prostitution.

15 9. Defendants HAKOPYAN, KASSIANOVA, and MURAVYEVA, and
16 unindicted co-conspirators known and unknown to the Grand Jury,
17 engaged in such activities for profit. Specifically, defendants
18 HAKOPYAN, KASSIANOVA, and MURAVYEVA retained approximately half
19 of the prostitution proceeds.

20 **C. OVERT ACTS**

21 In furtherance of the conspiracy and to accomplish its
22 object, on or about the dates indicated below, defendants
23 HAKOPYAN, KASSIANOVA, and MURAVYEVA, and unindicted co-
24 conspirators known and unknown to the Grand Jury, committed the
25 following overt acts, among others, within the Central District
26 of California and elsewhere:

1 O.Z.

2 1. In or before July 2009, defendant HAKOPYAN recruited
3 O.Z., a Russian national, to enter the United States in order to
4 engage in prostitution.

5 2. On multiple occasions between July 2009 and June 12,
6 2010, defendant HAKOPYAN provided arrival/destination information
7 to O.Z. in order to assist O.Z. through CBP inspection at Los
8 Angeles International Airport ("LAX").

9 3. In or about July 2009, defendants HAKOPYAN, KASSIANOVA,
10 and MURAVYEVA arranged for provocative, partially nude
11 photographs to be taken of O.Z.

12 4. From in or about July 2009 to in or about September
13 2011, defendants HAKOPYAN, KASSIANOVA, and MURAVYEVA caused
14 internet advertisements for "escort services" containing
15 photographs of O.Z. to be posted on www.thatmall.com and
16 www.ergos-guide.com.

17 5. In or about June 2011, defendant HAKOPYAN arranged for
18 housing for O.Z. in Los Angeles County.

19 O.J.

20 6. In or before June 2010, defendant HAKOPYAN recruited
21 O.J., a Latvian national, to enter the United States in order to
22 engage in prostitution.

23 7. In or before June 2010, defendants HAKOPYAN and
24 KASSIANOVA purchased an airline ticket for O.J. to travel from
25 Riga, Latvia to LAX.

26 8. On or about June 20, 2010, defendant HAKOPYAN provided
27 arrival/destination information to O.J. in order to assist O.J.
28 through CBP inspection at LAX.

1 9. In or about July 2009, defendants HAKOPYAN, KASSIANOVA,
2 and MURAVYEVA arranged for provocative, partially nude
3 photographs to be taken of O.J.

4 10. From in or about July 2009 to in or about December
5 2010, defendants HAKOPYAN, KASSIANOVA, and MURAVYEVA caused
6 internet advertisements for "escort services" containing
7 photographs of O.J. to be posted on www.thatmall.com and
8 www.ergos-guide.com.

9 T.J.

10 11. In or before December 2010, defendant HAKOPYAN
11 recruited T.J., a Latvian national, to enter the United States in
12 order to engage in prostitution.

13 12. On or before January 27, 2011, defendants HAKOPYAN and
14 MURAVYEVA purchased an airline ticket for T.J. to travel from
15 Riga, Latvia to LAX.

16 13. On or before January 27, 2011, defendant HAKOPYAN
17 provided arrival/destination information to T.J. in order to
18 assist T.J. through CBP inspection at LAX.

19 14. From in or about January 2011 until on or about April
20 2011, defendants HAKOPYAN, KASSIANOVA, and MURAVYEVA caused
21 internet advertisements for "escort services" containing
22 photographs of T.J. to be posted on www.thatmall.com.

23 V.K.

24 15. In or before December 2010, defendant HAKOPYAN
25 recruited V.K., a Latvian national, to enter the United States in
26 order to engage in prostitution.

27 16. In or about December 2010, defendant HAKOPYAN provided
28 arrival/destination information to V.K. in order to assist V.K.

1 through CBP inspection at LAX.

2 17. In or about December 2010, defendants HAKOPYAN and
3 KASSIANOVA paid for V.K.'s ESTA application to enter the United
4 States under the VWP.

5 18. From in or about December 2010 to in or about August
6 2011, defendants HAKOPYAN, KASSIANOVA, and MURAVYEVA caused
7 internet advertisements for "escort services" containing
8 photographs of V.K. to be posted on www.thatmall.com.

9 S.P.

10 19. In or before July 2011, defendant HAKOPYAN recruited
11 S.P., a Latvian national, to enter the United States in order to
12 engage in prostitution.

13 20. On or before July 6, 2011, defendant HAKOPYAN provided
14 arrival/destination information to S.P. in order to assist S.P.
15 through CBP inspection at LAX.

16 21. On or before July 6, 2011, defendants HAKOPYAN and
17 MURAVYEVA purchased an airline ticket for S.P. to travel from
18 Riga, Latvia to LAX.

19 22. In or about July 2011, defendant HAKOPYAN arranged for
20 housing for S.P. in the Central District of California.

21 23. From in or about July 2011 to in or about September
22 2011, defendants HAKOPYAN, KASSIANOVA, and MURAVYEVA caused
23 internet advertisements for "escort services" containing
24 photographs of S.P. to be posted on www.thatmall.com.

25 K.D. and L.M

26 24. In or before September 2011, defendant HAKOPYAN
27 recruited K.D. and L.M., Latvian nationals, to enter the United
28 States in order to engage in prostitution.

1 25. On or before September 7, 2011, defendants HAKOPYAN and
2 MURAVYEVA purchased airline tickets for K.D. and L.M. to travel
3 from Riga, Latvia to LAX.

4 26. On or before September 7, 2011, defendant HAKOPYAN
5 provided arrival/destination information to K.D. and L.M. in
6 order to assist K.D. and L.M. through CBP inspection at LAX.

7 27. On or about September 7, 2011, defendant HAKOPYAN
8 attempted to pickup K.D. and L.M. from the arrival area at LAX.

9 Y.M.

10 28. In or before February 2011, defendant HAKOPYAN
11 recruited Y.M., a Russian national, to enter the United States in
12 order to engage in prostitution.

13 29. In or before February 2012, defendant HAKOPYAN arranged
14 for housing for Y.M. in the Central District of California.

15 30. In or before February 2012, defendants HAKOPYAN,
16 MURAVYEVA, and KASSIANOVA caused internet advertisements for
17 "escort services" containing photographs of Y.M. to be posted on
18 www.cityvibe.com and www.eros-guide.com.

19 31. On or about February 7, 2012, defendant KASSIANOVA sent
20 a text message to an undercover agent who was posing as a client
21 or "john" which message provided Y.M.'s location in order to
22 engage in prostitution.

23 32. On or about February 25, 2012, defendant HAKOPYAN
24 posted an internet advertisement on the Orange County adult
25 entertainment section of www.backpage.com advertising "beautiful,
26 exchange students from several Eastern European countries."
27
28

COUNTS TWO AND THREE

[8 U.S.C. § 1324(a)(2)(B)(ii)]

On or about September 7, 2011, in Los Angeles County, within the Central District of California, and elsewhere, defendant MHER HAKOPYAN, also known as ("aka") "Mike Akopyan," knowing and in reckless disregard of the fact that the following aliens had not received prior official authorization to come to, enter and reside in the United States, did bring and attempt to bring to the United States said aliens for the purpose of commercial advantage and private financial gain.

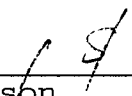
<u>COUNT</u>	<u>ALIEN</u>
TWO	K.D.
THREE	L.M.

COUNT FOUR

[8 U.S.C. § 1324(a)(2)(B)(ii)]

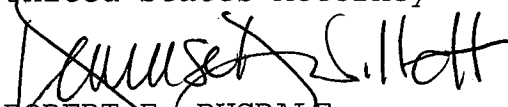
On or about June 20, 2010, in Los Angeles County, within the Central District of California, and elsewhere, defendant MHER HAKOPYAN, also known as ("aka") "Mike Akopyan," and ALLA KASSIANOVA, aka "Ala," aka "Elly," knowing and in reckless disregard of the fact that an alien, namely, O.J., had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain.

A TRUE BILL



Foreperson

ANDRÉ BIROTTE JR.
United States Attorney


ROBERT E. DUGDALE
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