



- COUNT 3: THEFT - \$20,000 OR MORE,  
C.R.S. § 18-4-401(1), (2)(D) (F-3)  
*Karen Gasparyan*
- COUNT 4: THEFT - \$20,000 - \$100,000,  
C.R.S. § 18-4-401(1), (2)(H) (F-4)  
*Mohinder Grover and/or Gold Exchange*
- COUNT 5: THEFT - \$20,000 OR MORE,  
C.R.S. § 18-4-401(1), (2)(D) (F-3)  
*Karen Gasparyan*
- COUNT 6: THEFT BY RECEIVING - \$1,000 - \$20,000,  
C.R.S. § C.R.S. 18-4-410(1),(4) (F-4)  
*Mohinder Grover and/or Gold Exchange*
- COUNT 7: THEFT - \$20,000 - \$100,000,  
C.R.S. § 18-4-401(1), (2)(H) (F-4)  
*Karen Gasparyan*
- COUNT 8: THEFT - \$20,000 - \$100,000,  
C.R.S. § 18-4-401(1), (2)(H) (F-4)  
*Mohinder Grover and/or Gold Exchange*
- COUNT 9: FRAUD BY CHECK – ACCOUNT CLOSED OR NO ACCOUNT,  
C.R.S. § 18-5-205(2), (3)(D) (F-6)  
*Karen Gasparyan*
- COUNT 10: FRAUD BY CHECK – ACCOUNT CLOSED OR NO ACCOUNT,  
C.R.S. § 18-5-205(2), (3)(D) (F-6)  
*Karen Gasparyan*
- COUNT 11: FRAUD BY CHECK – ACCOUNT CLOSED OR NO ACCOUNT,  
C.R.S. § 18-5-205(2), (3)(D) (F-6)  
*Karen Gasparyan*
- COUNT 12: THEFT - \$20,000 - \$100,000,  
C.R.S. § 18-4-401(1), (2)(H) (F-4)  
*Karen Gasparyan*
- COUNT 13: THEFT - \$20,000 - \$100,000,  
C.R.S. § 18-4-401(1), (2)(H) (F-4)  
*Mohinder Grover and/or Gold Exchange*

- COUNT 14: THEFT - \$5,000 - \$20,000,  
C.R.S. § 18-4-401(1), (2)(G) (F-5)  
*Karen Gasparyan*
- COUNT 15: THEFT - \$2,000 - \$5,000,  
C.R.S. § 18-4-401(1), (2)(F) (F-6)  
*Mohinder Grover and/or Gold Exchange*
- COUNT 16: THEFT - \$20,000 - \$100,000,  
C.R.S. § 18-4-401(1), (2)(H) (F-4)  
*Karen Gasparyan*
- COUNT 17: FRAUD BY CHECK – ACCOUNT CLOSED OR NO ACCOUNT,  
C.R.S. § 18-5-205(2), (3)(D) (F-6)  
*Karen Gasparyan*
- COUNT 18: FRAUD BY CHECK – ACCOUNT CLOSED OR NO ACCOUNT,  
C.R.S. § 18-5-205(2), (3)(D) (F-6)  
*Karen Gasparyan*
- COUNT 19: THEFT - \$20,000 - \$100,000,  
C.R.S. § 18-4-401(1), (2)(H) (F-4)  
*Karen Gasparyan*
- COUNT 20: THEFT - \$1,000 - \$20,000,  
C.R.S. § 18-4-401(1), (2)(C) (F-4)  
*Karen Gasparyan*
- COUNT 21: THEFT - \$1,000 - \$20,000,  
C.R.S. § 18-4-401(1), (2)(C) (F-4)  
*Karen Gasparyan*
- COUNT 22: FORGERY OF CHECKS OR COMMERCIAL INSTRUMENTS,  
C.R.S. § 18-5-102(1), (c) (F-5)  
*Karen Gasparyan*
- COUNT 23: FRAUD BY CHECK - \$1000 OR MORE,  
C.R.S. § 18-5-205(2), (3)(C) (F-6)  
*Karen Gasparyan*
- COUNT 24: FRAUD BY CHECK - \$1000 OR MORE,  
C.R.S. § 18-5-205(2), (3)(C) (F-6)  
*Karen Gasparyan*

- COUNT 25: FRAUD BY CHECK - \$1000 OR MORE,  
C.R.S. § 18-5-205(2), (3)(C) (F-6)  
*Karen Gasparyan*
- COUNT 26: THEFT - \$5,000 - \$20,000,  
C.R.S. § 18-4-401(1), (2)(G) (F-5)  
*Karen Gasparyan*
- COUNT 27: THEFT - \$5,000 - \$20,000,  
C.R.S. § 18-4-401(1), (2)(G) (F-5)  
*Karen Gasparyan*
- COUNT 28: THEFT - \$5,000 - \$20,000,  
C.R.S. § 18-4-401(1), (2)(G) (F-5)  
*Karen Gasparyan*
- COUNT 29: THEFT - \$20,000 - \$100,000,  
C.R.S. § 18-4-401(1), (2)(H) (F-4)  
*Karen Gasparyan*
- COUNT 30: FRAUD BY CHECK - ACCOUNT CLOSED OR NO ACCOUNT,  
C.R.S. § 18-5-205(2), (3)(D) (F-6)  
*Karen Gasparyan*
- COUNT 31: FRAUD BY CHECK - ACCOUNT CLOSED OR NO ACCOUNT,  
C.R.S. § 18-5-205(2), (3)(D) (F-6)  
*Karen Gasparyan*
- COUNT 32: THEFT - \$5,000 - \$20,000,  
C.R.S. § 18-4-401(1), (2)(G) (F-5)  
*Mohinder Grover and/or Gold Exchange*

Counts Involving KAREN GASPARYAN: 1, 2, 3, 5, 7, 9, 10, 11, 12, 14, 16, 17, 18, 19, 20;  
21, 22, 23, 24, 25, 26, 27, 28, 29, 30, and 31.

Counts Involving MOHINDER GROVER: 1, 2, 4, 6, 8, 13, 15, and 32.

Counts Involving GOLD EXCHANGE: 1, 2, 4, 6, 8, 13, 15, and 32.

COUNT ONE

**VIOLATION OF THE COLORADO ORGANIZED CRIME CONTROL ACT –  
COCCA – PATTERN OF RACKETEERING ACTIVITY – PARTICIPATION IN AN  
ENTERPRISE, C.R.S. § 18-17-104(3) (CLASS 2 FELONY)**

Between December 1, 2012, and December 1, 2013, in the State of Colorado, **KAREN GASPARYAN, MOHINDER GROVER and GOLD EXCHANGE, LLC**, and other persons or entities both known or unknown to the Colorado State Grand Jury and the Attorney General's Office, while employed by or associated with an enterprise, unlawfully, feloniously and knowingly conducted or participated, directly or indirectly, in the enterprise through a pattern of racketeering activity, in violation of sections 18-17-104(3) and 18-17-105, C.R.S.

COUNT TWO

**VIOLATION OF THE COLORADO ORGANIZED CRIME CONTROL ACT –  
CONSPIRACY, C.R.S. § 18-17-104(4) (CLASS 2 FELONY)**

Between December 1, 2012, and December 1, 2013, in the State of Colorado, **KAREN GASPARYAN, MOHINDER GROVER, and GOLD EXCHANGE, LLC**, persons associated with an enterprise, did unlawfully, feloniously and knowingly conspire to conduct or participate in said enterprise, directly or indirectly, through a pattern of racketeering activity in violation of sections 18-17-104(4) and 18-17-104(3), C.R.S.

Counts Three through Fifteen and the other identified Predicate Acts set forth the relevant acts of racketeering activity and are incorporated in Counts One and Two, by this reference. The relevant acts of racketeering activity include any lesser-included offenses of Counts Three through Fifteen and other identified predicate acts.

## THE ENTERPRISE

The Enterprise alleged in Counts One and Two is primarily a group of individuals, associated in fact, although not a legal entity, as well as one legal entity. More specifically, the Enterprise included, but was not limited to, the following associated in fact individuals and/or legal entities:

**KAREN GASPARYAN, MOHINDER GROVER and GOLD EXCHANGE, LLC**, and other persons or entities known or unknown to the Colorado State Grand Jury who were involved in racketeering activity described herein that was related to the conduct of the Enterprise.

The associated individuals and entities listed above, who comprise the Enterprise, participated in a purposeful, ongoing scheme to commit theft by defrauding numerous Colorado citizens, pawn brokers, and jewelry dealers. Mr. Gasparyan held himself out as a high-end jewelry broker, but in reality, his primary business was the ongoing conspiracy of stealing and liquidating other people's jewelry. He would obtain jewelry by deception; promised to sell the items for a profit and return the money, but then misappropriated the items by selling them to Mohinder Grover and/or Gold Exchange.

## PATTERN OF RACKETEERING ACTIVITY

**KAREN GASPARYAN, MOHINDER GROVER, GOLD EXCHANGE, LLC**, and others known and unknown to the Grand Jury, directly and in concert, engaged in, attempted to engage in, conspired to engage in, or solicited another to engage in at least two predicate acts, including any lesser offenses, related to the conduct of the enterprise, with at least one of the acts taking place in the State of Colorado after July 1, 1981 and the last of the acts of racketeering activity occurring within ten years after a prior act of racketeering activity and include:

Theft, § 18-4-401, C.R.S.  
Fraud by Check, § 18-5-205, C.R.S.

This Statewide Grand Jury investigation, entitled "Pawn Stars," began when several victims forwarded written statements to law enforcement detailing Mr. Gasparyan's predatory and felonious activities, including theft and insurance fraud. Eventually, those statements were forwarded to the Aurora Police Department and the Colorado Attorney General's Office. The primary complaints involved theft of luxury goods through fraud and deception.

Mr. Gasparyan would obtain luxury goods by convincing jewelry dealers and citizens to give him items on consignment, but then he would sell those items to various second-hand retailers and keep the money. Specifically, Mr. Gasparyan sold several stolen items to Mohinder Grover at the Gold Exchange, located at 3140 S. Parker Road, Unit #9, in Aurora,

Colorado. Although required by law to keep records, Mr. Grover and the Gold Exchange intentionally failed to keep records of most transactions with Mr. Gasparyan.

One act in furtherance of this identified conspiracy took place on or about December 7, 2012, when Karen Gasparyan went to Wells Fargo Bank and opened checking account #1018804896. In order to open the account, Mr. Gasparyan made a deposit of \$100 and was given a book of starter checks. This was the only deposit ever made to Mr. Gasparyan's account.

On or about December 18, 2012, Mr. Gasparyan ordered a book of checks and his account was charged \$9.95, leaving the account a balance of \$90.05.

On or about December 24, 2012, Karen Gasparyan's Wells Fargo Account #1018804896 was closed due to "Unsatisfactory Handling". Although Mr. Gasparyan's checking account was only open for a total of 17 days, he continued to pass numerous high-dollar checks, knowing the account was closed. In August of 2013, he passed several bad checks to Nicholas Sprung and Craig Studley. Mr. Gasparyan used these fraudulent checks as a mechanism for obtaining luxury cars, jewelry and watches from local businesses and citizens.

Additionally, Karen Gasparyan took numerous victims to Williams Jewelers to purchase Rolex Watches and jewelry on the victims' credit. Mr. Gasparyan would tell his victims that he could help them build their credit and make some quick money, by sending the watches and/or jewelry to Russia and Armenia. This ruse allowed Mr. Gasparyan to avoid raising the victim's suspicion about the money for a significant period of time, since international transactions may take weeks or months to complete.

Mr. Gasparyan also preyed on the business customs of pawn and jewelry brokers. His modus operandi involved meeting individuals with experience and contacts in the jewelry business, then offering to work together as partners. Using the other person's good will, Mr. Gasparyan would convince jewelers and pawn dealers to "memo" items to him, so he could sell them for a profit.

The term "memo" in the pawn and jewelry industry means to give an item on consignment, with the understanding that the item would either be sold and paid for, or returned within a reasonable period of time. Most jewelry dealers will write memos which detail the date, borrower, merchandise taken and the agreed-upon price.

On or about and between July 1, 2013 and September 1, 2013, Karen Gasparyan recruited Steve Whitney to work with him to buy and re-sell luxury watches and jewelry. Mr. Gasparyan represented that he had numerous businesses in Colorado and knew people who would be interested in purchasing expensive watches, diamonds and gold jewelry. Mr. Whitney was unemployed at the time and thought that working with Mr. Gasparyan might be a good business opportunity. Mr. Gasparyan told Mr. Whitney that his job would be to introduce him to people in the jewelry business and to acquire high-end jewelry, watches and gold on memo.

Mr. Whitney subsequently introduced Mr. Gasparyan to several of his local contacts in the jewelry business, including Craig Studley at AVS Wholesale Jewelers, Gabriel Sarikov at Montbello Pawn, Randy Piserchio at Colorado Gold Mart, and independent jewelry dealer Kim Nguyen. Each party agreed to memo luxury items to Karen Gasparyan and each suffered a significant pecuniary loss as a result.

Initially Mr. Gasparyan would represent himself to be trustworthy by returning unsold items and bringing some money back to pay for items he had sold. Once he established a successful transaction, most victims believed Mr. Gasparyan was a legitimate jewelry dealer and assumed that he was not going to steal from them.

Once he completed a successful transaction, Mr. Gasparyan would claim that he had a large volume buyer and request to take more high-end jewelry and watches on memo. This is when most victims started to have problems with Mr. Gasparyan. After several days passed without payment for the items loaned on memo, victims would then call repeatedly in an attempt to recover their money or jewelry. Mr. Gasparyan would provide excuses and say that he would have the money soon, but never actually paid for or returned the items. Victims reported that Mr. Gasparyan eventually stopped returning phone calls and/or his telephone number was disconnected.

Mohinder Grover previously stated in 2012 that he was aware Mr. Gasparyan was selling him stolen merchandise. Mr. Grover continued to buy stolen jewelry from Mr. Gasparyan, in his capacity as a high managerial agent of the Gold Exchange, which allowed it to become an outlet for liquidating stolen merchandise. Several of the items Mr. Gasparyan took out on memo from other jewelry dealers ended up being located at, or offered for sale by the Gold Exchange. These items include a necklace belonging to Mark Katsnelson (\$45,000), two high-end watches belonging to Nicholas Sprung (\$31,000), a Rolex belonging to Daniel Leyman (\$13,000), and a 3.03 carat diamond belonging to Kim Nguyen (\$50,000). Each of these items was found being offered for sale by Mohinder Grover. This arrangement enabled Karen Gasparyan to easily liquidate the stolen merchandise.

Between July 31, 2013 and August 27, 2013, Mr. Grover wrote a total of twenty-two checks to Mr. Gasparyan, which total over \$117,000.

The following is a summary of checks written from the Gold Exchange's Wells Fargo checking account #8941537212 to Karen Gasparyan during July and August:

Date Written	Date Cashed	Payee	Amount	Check#
7/31/2013	7/31/2013	Karen Gasparyan	\$7,000.00	1001
8/1/2013	8/1/2013	Karen Gasparyan	\$7,200.00	1010
8/1/2013	8/2/2013	Karen Gasparyan	\$2,500.00	1011
8/2/2013	8/2/2013	Karen Gasparyan	\$3,500.00	1012
8/2/2013	8/5/2013	Karen Gasparyan	\$8,000.00	1508
8/5/2013	8/6/2013	Karen Gasparyan	\$4,800.00	1510
8/5/2013	8/6/2013	Karen Gasparyan	\$6,200.00	1511
8/7/2013	8/7/2013	Karen Gasparyan	\$4,000.00	1520
8/7/2013	8/7/2013	Karen Gasparyan	\$6,000.00	1008
8/7/2013	8/7/2013	Karen Gasparyan	\$9,000.00	1518
8/7/2013	8/7/2013	Karen Gasparyan	\$9,100.00	1519
8/7/2013	8/8/2013	Karen Gasparyan	\$8,400.00	1521
8/8/2013	8/8/2013	Karen Gasparyan	\$12,900.00	1524
8/8/2013	8/9/2013	Karen Gasparyan	\$4,000.00	1531
8/13/2013	8/14/2013	Karen Gasparyan	\$2,300.00	1552
8/14/2013	8/14/2013	Karen Gasparyan	\$3,500.00	1556
8/13/2013	8/14/2013	Karen Gasparyan	\$5,700.00	1551
8/14/2013	8/14/2013	Karen Gasparyan	\$7,100.00	1557
8/19/2013	8/19/2013	Karen Gasparyan	\$1,000.00	1573
8/15/2013	8/19/2013	Karen Gasparyan	\$2,500.00	1567
8/20/2013	8/20/2013	Karen Gasparyan	\$2,000.00	1584
8/27/2013	8/28/2013	Karen Gasparyan	\$1,007.00	1600
			<b>\$ 117,707.00</b>	

In total, between July 31 and August 27, 2013, Mohinder Grover wrote Karen Gasparyan twenty-two checks, drawn on Gold Exchange checking accounts, totaling \$117,707. Mr. Grover was unable to provide any records of these transactions which would establish the items that he and/or Gold Exchange purchased from Mr. Gasparyan.

**PREDICATE ACT ONE**

THEFT - \$20,000 OR MORE, C.R.S. 18-4-401(1),(2)(D)  
(Class 3 Felony)

On or about and between January 1, 2013 and June 1, 2013, in the City of Aurora of Arapahoe County, in the State of Colorado, KAREN GASPARYAN, unlawfully, feloniously and knowingly obtained or exercised control over a thing of value, namely: a NECKLACE and/or EARRINGS, of MARK KATSNELSON and/or SLAVA KATSNELSON, with the value of twenty thousand dollars or more, without authorization, or by threat or deception, and knowingly used, concealed, or abandoned the thing of value in such manner as to permanently deprive MARK KATSNELSON and/or SLAVA KATSNELSON of its use or benefit; in violation of section 18-4-401(1),(2)(D) C.R.S. (Class 3 Felony), and against the peace and dignity of the People of the State of Colorado.

**PREDICATE ACT TWO**

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H)  
(Class 4 Felony)

On or about and between January 1, 2013 and September 25, 2013, in the City of Aurora of Arapahoe County, in the State of Colorado, MOHINDER GROVER and/or GOLD EXCHANGE, unlawfully, feloniously and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: A NECKLACE, of MARK KATSNELSON and/or SLAVA KATSNELSON, with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and knowingly used, concealed, or abandoned the thing of value in such manner as to permanently deprive MARK KATSNELSON and/or SLAVA KATSNELSON of its use or benefit; in violation of section 18-4-401(1),(2)(H) C.R.S. (Class 4 Felony), and against the peace and dignity of the People of the State of Colorado.

The offenses alleged in Predicate Acts One and Two, and in associated stand-alone Counts Three and Four, were committed in the State of Colorado in the following manner:

In early 2013, Slava Katsnelson worked with Karen Gasparyan to sell an expensive necklace and earring set, owned by Slava's father Mark Katsnelson. The appraised value of this set is \$55,000, but Mark Katsnelson paid \$25,000. Once they were unsuccessful trying to sell the items, Mr. Katsnelson and Mr. Gasparyan returned to Katsnelson's residence at 2207 South Lima Court, in Aurora, Colorado.

When they arrived at the residence, Slava Katsnelson placed the necklace and earring set on the dining room table. Mr. Gasparyan stated that he could sell the items and have money in three days, if Mr. Katsnelson would let him send the set to Armenia. Slava Katsnelson strongly and repeatedly objected to Mr. Gasparyan taking the set, but Mr. Gasparyan took the items and removed them from the residence anyway. Several days later,

Slava Katsnelson told his father that Karen Gasparyan had taken the necklace and earrings. Despite promises from Mr. Gasparyan that he would deliver the money, neither Slava nor Mark Katsnelson ever received any money for the necklace and earring set.

Prior to this incident, around January of 2013, Mark Katsnelson went to the Gold Exchange and asked if Mr. Grover would be interested in purchasing the same necklace and earring set. Mohinder Grover offered \$8,000 for the set and Mr. Katsnelson refused to sell it for such a low price. The necklace alone has an appraised value of \$45,000.

Mark Katsnelson subsequently located the necklace in question at the Gold Exchange, located at 3140 S. Parker Road, in Aurora, Colorado. Mr. Katsnelson went to the Gold Exchange and confronted Mohinder Grover about his stolen necklace. Mr. Grover indicated that the necklace was now his and that he had purchased it from Karen Gasparyan for \$8,000. Mr. Grover offered to resell the necklace to Mr. Katsnelson for \$14,000. Mr. Katsnelson then drafted a letter, informing Mr. Grover in writing that Karen Gasparyan stole the necklace from his son and demanding its return.

On or about September 25, 2013, the Aurora Police Department executed a search warrant on the Gold Exchange, located at 3140 S. Parker Road, Unit #9, in Aurora, Colorado. Police were able to recover numerous stolen items, including the necklace which Mark Katsnelson identified as part of the set stolen from his son, Slava Katsnelson.

Detective Lance Highland of the Aurora Police Department spoke with Mohinder Grover who admitted purchasing the necklace in question from Karen Gasparyan several months prior for \$8,000. Once again, Mr. Grover was unable to produce any documentation detailing his purchase of Mr. Katsnelson's necklace from Mr. Gasparyan. Mr. Grover also admitted that he never asked about ownership of the set when he purchased it from Karen Gasparyan.

In total, Mr. Katsnelson suffered a financial loss in excess of \$25,000 as a result of his dealings with Mr. Gasparyan and Mr. Grover.

### PREDICATE ACT THREE

THEFT - \$20,000 OR MORE, C.R.S. 18-4-401(1),(2)(D)  
(Class 3 Felony)

On or about and between May 1, 2013 and May 22, 2013, in the City of Englewood of Arapahoe County, in the State of Colorado, KAREN GASPARYAN, unlawfully, feloniously and knowingly obtained or exercised control over a thing of value, namely: ROLEX WATCHES, of DANIEL LEYMAN, with the value of twenty thousand dollars or more, without authorization, or by threat or deception, and knowingly used, concealed, or abandoned the thing of value in such manner as to permanently deprive DANIEL LEYMAN of its use or benefit; in violation of section 18-4-401(1),(2)(D) C.R.S. (Class 3 Felony), and against the peace and dignity of the People of the State of Colorado.

**PREDICATE ACT FOUR**

THEFT BY RECEIVING – \$1,000 - \$20,000, C.R.S. 18-4-410(1),(4)  
(Class 4 Felony)

On or about and between May 1, 2013 and May 22, 2013, in the City of Aurora of Arapahoe County, in the State of Colorado, MOHINDER GROVER and/or GOLD EXCHANGE, unlawfully and feloniously received, retained, loaned money by pawn or pledge, or disposed of a thing of value, namely: A ROLEX WATCH, of DANIEL LEYMAN, and the defendant knew or believed the thing of value had been stolen and intended to deprive the lawful owner, permanently of its use or benefit, and the value of the property was one thousand dollars or more but less than twenty thousand dollars; in violation of section 18-4-410(1),(4), C.R.S. (Class 4 Felony), and against the peace and dignity of the People of the State of Colorado.

The offenses alleged in Predicate Acts Three and Four, and in the associated stand-alone Counts Five and Six, were committed in the State of Colorado in the following manner:

On or about and between May 1, 2013 and May 2, 2013, Karen Gasparyan took Daniel Leyman to Williams Jewelers to buy two Rolex watches. At the time, Daniel Leyman was unemployed, homeless and living in motels. He had no money. Mr. Gasparyan approached Mr. Leyman and told him that he had a guaranteed job for him working at a car dealership. Mr. Gasparyan instructed Mr. Leyman to fill out an application which included all of his personal identifying information.

Daniel Leyman believed that Mr. Gasparyan was trying to help him build his credit and make money. Mr. Gasparyan further explained to Daniel Leyman that he wanted to help make Daniel's father proud of him.

On or about and between May 1, 2013 and May 2, 2013, Daniel Leyman purchased one Rolex Datejust (Mod#116234/Ser#G627223) valued at \$7,401.75 and one Rolex GMT – Master II (Mod#116713/Ser#G846765) valued at \$12,614.25. The total amount financed by Daniel Leyman was \$20,688.00.

At the time of the purchase, Karen Gasparyan instructed employees to put the name "P. Patel" on the Rolex warranty card.

Mr. Gasparyan stated that he had a buyer and insisted on keeping possession of the watches, even though Daniel Leyman made the purchases with his credit. Mr. Gasparyan subsequently began to miss scheduled meetings with Daniel Leyman and stopped answering his phone calls. Daniel Leyman never received the job at the car dealerships that he was promised, never saw the watches again, and was not compensated for their value. Mr. Leyman stated that Mr. Gasparyan only gave him \$150 in cash, after he purchased the first watch. Mr. Leyman ultimately reported the theft to his father, Michael Leyman, who attempted to stay close to Mr. Gasparyan in order to recover the watches. Recovery efforts to

date have been unsuccessful and Mr. Leyman subsequently reported the incident to the Aurora Police Department. He is currently paying off Daniel Leyman's debt to Williams Jewelers.

On or about May 22, 2013, Michail Davidson pawned the same Rolex GMT – Master II (Mod#116713/Ser#G846765) at Pawn Go in Centennial, Colorado. When detectives discovered that the watch was pawned they questioned Mr. Davidson about the source of the watch.

Mr. Davidson stated that he purchased the watch from Mohinder Grover at the Gold Exchange off of Parker Road in Aurora. At the time of the purchase, Mr. Grover told Mr. Davidson that a customer bought the watch and did not like it, so they just got rid of it with the box and original paperwork. After being questioned about the watch by police, Mr. Davidson confronted Mr. Grover and asked him why the police were concerned about the watch. Mr. Grover then changed his story about where the watch came from and explained that he actually purchased the watch from Karen Gasparyan. Mr. Grover subsequently admitted to the police that he purchased the Rolex GMT from Karen Gasparyan.

After pawning the Rolex GMT, Mr. Davidson repaid the loan to Pawn Go and took possession of the watch. The Rolex GMT was subsequently transferred to police custody.

Daniel Leyman's total loss as a result of his dealings with Karen Gasparyan exceeds \$20,000. Michail Davidson's total loss as a result of his dealings with Mohinder Grover exceeds \$10,000.

#### PREDICATE ACT FIVE

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H)  
(Class 4 Felony)

On or about and between August 1, 2013 and September 1, 2013, in Cherry Hills Village of Arapahoe County, in the State of Colorado, KAREN GASPARYAN, unlawfully, feloniously and knowingly, without authorization or by threat or deception, obtained, retained or exercised control over property of another, namely: WATCHES, of NICHOLAS SPRUNG, with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and knowingly used concealed or abandoned the thing of value in such a manner as to permanently deprive NICHOLAS SPRUNG of its use or benefit; in violation of section 18-4-401(1),(2)(H) C.R.S. (Class 4 Felony), and against the peace and dignity of the People of the State of Colorado.

**PREDICATE ACT SIX**

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H)  
(Class 4 Felony)

On or about and between August 1, 2013 and September 25, 2013, in the City of Aurora of Arapahoe County, in the State of Colorado, MOHINDER GROVER and/or GOLD EXCHANGE, unlawfully, feloniously and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: WATCHES, of NICHOLAS SPRUNG, with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and knowingly used, concealed, or abandoned the thing of value in such manner as to permanently deprive NICHOLAS SPRUNG of its use or benefit; in violation of section 18-4-401(1),(2)(H) C.R.S. (Class 4 Felony), and against the peace and dignity of the People of the State of Colorado.

**PREDICATE ACT SEVEN**

FRAUD BY CHECK - ACCOUNT CLOSED OR NO ACCOUNT,  
C.R.S. § 18-5-205(2),(3)(D) (Class 6 Felony)

On or about and between August 1, 2013 and September 1, 2013, in Cherry Hills Village of Arapahoe County, in the State of Colorado, KAREN GASPARYAN, knowing he had insufficient funds with the drawee, WELLS FARGO BANK, with intent to defraud, unlawfully and feloniously issued a check drawn on an account which had been closed for a period of thirty days or more to NICHOLAS SPRUNG for payment of property; in violation of section 18-5-205(2),(3)(d), C.R.S. (Class 6 Felony), and against the peace and dignity of the People of the State of Colorado.

**PREDICATE ACT EIGHT**

FRAUD BY CHECK - ACCOUNT CLOSED OR NO ACCOUNT,  
C.R.S. § 18-5-205(2),(3)(D) (Class 6 Felony)

On or about and between August 1, 2013 and September 1, 2013, in Cherry Hills Village of Arapahoe County, in the State of Colorado, KAREN GASPARYAN, knowing he had insufficient funds with the drawee, WELLS FARGO BANK, with intent to defraud, unlawfully and feloniously issued a check drawn on an account which had been closed for a period of thirty days or more to NICHOLAS SPRUNG for payment of property; in violation of section 18-5-205(2),(3)(d), C.R.S. (Class 6 Felony), and against the peace and dignity of the People of the State of Colorado.

## PREDICATE ACT NINE

### FRAUD BY CHECK - ACCOUNT CLOSED OR NO ACCOUNT, C.R.S. § 18-5-205(2),(3)(D) (Class 6 Felony)

On or about and between August 1, 2013 and September 1, 2013, in Cherry Hills Village of Arapahoe County, in the State of Colorado, KAREN GASPARYAN, knowing he had insufficient funds with the drawee, WELLS FARGO BANK, with intent to defraud, unlawfully and feloniously issued a check drawn on an account which had been closed for a period of thirty days or more to NICHOLAS SPRUNG for payment of property; in violation of section 18-5-205(2),(3)(d), C.R.S. (Class 6 Felony), and against the peace and dignity of the People of the State of Colorado.

The offenses alleged in Predicate Acts Five through Nine, and in associated stand-alone Counts Seven through Eleven, were committed in the State of Colorado in the following manner:

In early August of 2013, Steve Whitney, on behalf of Karen Gasparyan, contacted Nicholas Sprung and asked if he would be interested in selling any of his Rolex watches. Mr. Sprung trusted Mr. Whitney because they had known each other for many years and had previously done business together successfully. Mr. Whitney and Mr. Gasparyan subsequently went to Mr. Sprung's residence at 6411 E. Radcliff Avenue in the Cherry Hills Village of Arapahoe County, Colorado.

On or about August 6, 2013 Mr. Sprung agreed to sell and/or consign two watches to Mr. Gasparyan so he could sell them. The two watches were a Rolex Ladies Gold Yacht Master and a Men's Gold Yacht Master. The agreed upon price for the Ladies Gold Yacht Master was \$10,000 and the agreed upon price for the Men's Gold Yacht Master was \$16,000.

Mr. Gasparyan subsequently returned and paid Mr. Sprung \$10,000 in cash, which Mr. Sprung considered to be in full satisfaction of the debt for the Ladies Gold Yacht Master. Mr. Gasparyan represented that he would have the money for the other watch soon thereafter and requested to take two additional watches from Mr. Sprung.

Having received payment for the Ladies Gold Yacht Master, Mr. Sprung agreed to give Mr. Gasparyan two more watches, if Mr. Gasparyan would leave checks as collateral. One of the additional watches was a Rolex Daytona and the other was a Franck Mueller. The agreed upon price for the Rolex Daytona was approximately \$14,000 and the agreed upon price for the Franck Mueller was \$17,000.

As collateral and/or payment for these watches, Mr. Gasparyan uttered three checks to Mr. Sprung:

- Check #153, dated 8/9/13 was made out for \$9,000.
- Check #154, dated 8/10/13 was made out for \$8,000.

- Check #155, dated 8/11/13 was made out for \$14,000.

All three checks were made out by Steve Whitney at Mr. Gasparyan's direction, signed by Karen Gasparyan, and uttered to Nicholas Sprung. Mr. Gasparyan asked Mr. Sprung to hold the checks because he would bring him cash instead, but stated that Sprung could cash the checks if Gasparyan did not return with the money.

All three checks were written from Wells Fargo checking account #1018804896, which was closed on December 24, 2012 for "Unsatisfactory Handling".

After several days and numerous phone calls, Mr. Sprung became concerned that Mr. Gasparyan was not going to pay him or return the watches. Mr. Sprung was leaving the country and made arrangements to meet Mr. Gasparyan for payment of the watches. Mr. Gasparyan continually made excuses and stated that he was getting the money but never did. Just before he left the country on August 12, 2013, Mr. Sprung attempted to cash the checks and learned the account was closed.

On or about September 6, 2013, when Mr. Sprung returned from his trip, Steve Whitney suggested that he look for his watches at SAI Jewelers. Mr. Sprung subsequently went to SAI Jewelers, located at 3102 S. Parker Road, in Aurora and inquired about high-end watches. A man identified as Mohinder Grover came to the store and showed Mr. Sprung a box filled with Rolexes and other expensive watches. Mr. Sprung was able to positively identify his Rolex Men's Gold Yacht Master and Franck Mueller.

Rather than immediately reporting this to the police, Mr. Sprung attempted to get his money back from Mr. Gasparyan using a ruse. That effort proved unsuccessful and Mr. Sprung subsequently made a report with the Cherry Hills Village Police Department.

On or about September 25, 2013, Detective Lance Highland of the Aurora Police Department executed a search warrant on the Gold Exchange, located at 3140 S. Parker Road, in Aurora, Colorado. Gold Exchange is owned by Mohinder Grover. During the search, police recovered a Rolex Men's Gold Yacht Master watch and a Franck Mueller watch. Both items were positively identified by Nicholas Sprung as being the watches he gave to Mr. Gasparyan. The Rolex Daytona was not recovered.

During the search of the Gold Exchange, detectives asked Mohinder Grover how he came into possession of the watches. Mr. Grover stated that he purchased the watches from Karen Gasparyan, but once again was unable to provide police with any records of these transactions involving Mr. Gasparyan.

Mr. Sprung's total loss as a result of his dealings with Karen Gasparyan was \$47,000.

high-end jewelry. Mr. Whitney drove Ms. Nguyen to various jewelers in an attempt to buy and re-sell high end jewelry.

One day in late July or early August of 2013, Steve Whitney was at Kim Nguyen's house as the two were preparing to go look for jewelry. Mr. Gasparyan arrived unannounced at Ms. Nguyen's house and offered to sell her an expensive Tiffany diamond ring. Because Mr. Whitney was present, he verified the quality of the ring and advised Ms. Nguyen that it was a high-quality Tiffany piece. Ms. Nguyen purchased the ring for \$10,000. Mr. Whitney and Ms. Nguyen subsequently went to the Tiffany store in Cherry Creek to further verify its authenticity.

Several days later, Karen Gasparyan returned and wanted to buy the Tiffany ring back, offering \$2,000 more than Ms. Nguyen originally paid. Mr. Gasparyan said he had a buyer for the ring. Ms. Nguyen gave the ring to Steve Whitney, who then gave it to Karen Gasparyan, with the understanding that Mr. Gasparyan would be able to sell the ring for a quick profit. Ms. Nguyen never saw the Tiffany ring again and was never paid the \$12,000 she was promised for the ring. To date, the Tiffany ring has not been located.

Ms. Nguyen also had a two carat cushion cut diamond ring which she previously purchased for \$12,000. Mr. Gasparyan represented that he needed several diamonds to ship to Russia or Armenia and asked Ms. Nguyen for large and expensive diamonds. Ms. Nguyen gave the two carat cushion cut diamond ring to Steve Whitney, who subsequently gave it to Karen Gasparyan. Ms. Nguyen never received any money for the two carat cushion cut ring and never saw that diamond again either.

The final diamond Kim Nguyen lost to Karen Gasparyan weighed over three carats and was valued at over \$50,000. Although Ms. Nguyen was distrustful of Mr. Gasparyan at this point, she gave the diamond to Steve Whitney with explicit instructions not to give it to Karen Gasparyan. Mr. Whitney told Ms. Nguyen that he had another buyer but subsequently gave the diamond to Karen Gasparyan. Neither Mr. Whitney nor Ms. Nguyen ever saw the diamond again.

When Kim Nguyen purchased the 3.03 carat diamond, she also received a GIA certificate which evidenced that the diamond was a 3.03 carat, round brilliant diamond, with a clarity grade of VS1 and a color grade of H. GIA is the Gemological Institute of America, which grades the quality of diamonds and issues detailed reports. A GIA certificate dated October 4, 2001 accompanied the 3.03 carat diamond when Steve Whitney received it from Kim Nguyen.

On the back of the certification, Steve Whitney wrote a hand-written note which read:

*"Steve Whitney from Kim N. \$55,000"*.

This hand-written notation is consistent with the agreed-upon terms.

**PREDICATE ACT TEN**

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H)  
(Class 4 Felony)

On or about and between August 1, 2013 and August 7, 2013, in the City and County of Denver, in the State of Colorado, KAREN GASPARYAN, unlawfully, feloniously and knowingly obtained or exercised control over a thing of value, namely: DIAMONDS and/or JEWELRY, of KIM NGUYEN, with the value of twenty thousand dollars or more but less than one-hundred thousand dollars, without authorization, or by threat or deception, and knowingly used, concealed, or abandoned the thing of value in such manner as to permanently deprive KIM NGUYEN of its use or benefit; in violation of section 18-4-401(1),(2)(H) C.R.S. (Class 4 Felony), and against the peace and dignity of the People of the State of Colorado.

**PREDICATE ACT ELEVEN**

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H)  
(Class 4 Felony)

On or about August 7, 2013, in the City and County of Denver, in the State of Colorado, MOHINDER GROVER and/or GOLD EXCHANGE, unlawfully, feloniously and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: a DIAMOND, of KIM NGUYEN, with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and knowingly used, concealed, or abandoned the thing of value in such manner as to permanently deprive KIM NGUYEN of its use or benefit; in violation of section 18-4-401(1),(2)(H) C.R.S. (Class 4 Felony), and against the peace and dignity of the People of the State of Colorado.

The offenses alleged in Predicate Acts Ten and Eleven, and in associated stand-alone Counts Twelve and Thirteen, were committed in the State of Colorado in the following manner:

In late July or early August of 2013, Steve Whitney introduced Karen Gasparyan to Kim Nguyen. Ms. Nguyen is an independent jewelry dealer who works out of her house, located at 246 South Grove Street in Denver, Colorado. She primarily buys and sells her jewelry within the Vietnamese community. Prior to their first meeting, Karen Gasparyan called Ms. Nguyen on several occasions in an attempt to purchase jewelry from her. Each time Ms. Nguyen refused his requests.

Ms. Nguyen knew Steve Whitney for several years from his time working at Pawn Go, a local pawn store in Centennial, Colorado. After losing his job at Pawn Go, Mr. Whitney worked with Ms. Nguyen as a consultant regarding the authenticity and quality of

On or about August 7, 2013, Karen Gasparyan picked up Michael Leyman and told him that they needed to pick up Mohinder Grover so they could go downtown and sell some items. After picking up Mr. Grover, the three drove to the Denver Merchandise Mart, located at 451 E. 58<sup>th</sup> Avenue, in Denver, Colorado. The Denver Merchandise Mart has a section that houses wholesale diamond and jewelry brokers. Access to this area is highly restricted and only authorized dealers are allowed to walk around without an escort. On the drive to the Denver Merchandise Mart, Mr. Leyman overheard Mr. Grover and Mr. Gasparyan talking about a diamond.

Mohinder Grover subsequently entered the Denver Merchandise Mart and left Mr. Leyman and Mr. Gasparyan waiting in the car. While Mr. Grover was inside, Mr. Gasparyan asked Mr. Leyman to exit the vehicle so he could speak with Mr. Grover, in private, on the telephone.

After the telephone conversation with Mohinder Grover, Mr. Gasparyan told Michael Leyman that Mr. Grover was supposed to sell his diamond for a large amount of money. Mr. Gasparyan told Mr. Leyman that he would be able to repay his debt to Mr. Leyman because Mr. Grover was supposed to give him money pursuant to the sale of the diamond. Mr. Gasparyan owed Mr. Leyman money from loans and from two Rolex watches that he took from Mr. Leyman's son, Daniel Leyman.

On or about August 7, 2013, Mohinder Grover sold Rick Lutz a 3.03 carat diamond at the Denver Merchandise Mart, located at 451 E. 58<sup>th</sup> Avenue, in Denver, Colorado. Mr. Lutz is a wholesale diamond dealer with his principal place of business located in the Denver Merchandise Mart. Mr. Lutz made out the following two checks from Rick Lutz, Inc. to Gold Exchange for the purchase of the 3.03 carat diamond.

- Check #6216 was made out for \$42,500, with a memo of "3.03".
- Check #6217 was made out to Gold Exchange for \$2,000, with a memo of "balance".

Mr. Lutz stated that Mr. Grover told him the diamond was purchased by a couple for an investment in the late 1990's or early 2000's, and they wanted to liquidate the stone. He further stated that the owners were waiting in the car and that he needed to leave with either the diamond or a check.

Mr. Lutz indicated that he purchased the diamond without the GIA Certification. Mr. Lutz subsequently sent the diamond to GIA to have a new report generated, which increased the retail value of the stone.

Police subsequently questioned Mr. Lutz, who admitted purchasing the diamond from Mr. Grover. Following that conversation, Mr. Lutz contacted Mr. Grover to express his concerns about the diamond being stolen property. Mr. Grover told Mr. Lutz not to worry about it. When Mr. Lutz replied that he was worried about it, Mr. Grover told him to sell the diamond. Mr. Lutz had another subsequent conversation with Mr. Grover, wherein Mr.

Grover promised to make Mr. Lutz whole for any loss. Mr. Grover did not deny the diamond was stolen.

The 3.03 carat diamond was subsequently recovered by law enforcement.

Kim Nguyen suffered a total loss of \$74,000 as a result of her dealings with Mr. Gasparyan.

**PREDICATE ACT TWELVE**

THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(G)  
(Class 5 Felony)

On or about and between July 30, 2013 and September 1, 2013, in the City and County of Denver, in the State of Colorado, KAREN GASPARYAN, unlawfully, feloniously and knowingly, without authorization or by threat or deception, obtained, retained or exercised control over property of another, namely: JEWELRY, of GABRIEL SARIKOV, with the value of more than five thousand dollars, but less than twenty thousand dollars, and knowingly used, concealed, or abandoned the thing of value in such a manner as to permanently deprive GABRIEL SARIKOV of its use or benefit, in violation of section 18-4-401(1),(2)(G) C.R.S. (Class 5 Felony), and against the peace and dignity of the People of the State of Colorado.

**PREDICATE ACT THIRTEEN**

THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(F)  
(Class 5 Felony)

On or about and between July 30, 2013 and September 25, 2013, in the City of Aurora of Arapahoe County, in the State of Colorado, MOHINDER GROVER and/or GOLD EXCHANGE, unlawfully, feloniously and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: JEWELRY, of GABRIEL SARIKOV, with the value of five thousand dollars or more but less than twenty thousand dollars, and knowingly used, concealed, or abandoned the thing of value in such manner as to permanently deprive GABRIEL SARIKOV of its use or benefit; in violation of section 18-4-401(1),(2)(F) C.R.S. (Class 4 Felony), and against the peace and dignity of the People of the State of Colorado.

The offenses alleged in Predicate Acts Twelve and Thirteen, and in associated stand-alone Counts Fourteen and Fifteen, were committed in the State of Colorado in the following manner:

On or about and between July 1, 2013 and September 1, 2013, Karen Gasparyan took several pieces of jewelry on memo from Gabriel Sarikov at Montbello Pawn, located at 4624

Peoria Street, in Denver, Colorado. Similar to other transactions, Mr. Gasparyan wanted to memo the items and agreed to either pay for their value or return what he could not sell.

Mr. Sarikov memorialized the transaction by making an inventory list and taking photographs of each item. The following is a list of the items taken from Montbello Pawn by Karen Gasparyan:

- One Tiffany diamond ring for \$14,500.
- One pair of platinum earrings for \$1,500.
- Three gold rings for \$1,100.
- One diamond bracelet for \$900.
- One gold bracelet for \$900.
- Two sets of earrings for \$400.

The total value of the items given to Mr. Gasparyan on memo from Montbello Pawn is \$19,650. When Mr. Gasparyan took these items, he gave Mr. Sarikov a down-payment of \$3,500 for the Tiffany ring. Mr. Gasparyan never returned any of the items or paid Mr. Sarikov any additional money for their value.

Mr. Sarikov called Mr. Gasparyan numerous times trying to secure the return of his jewelry or money. Mr. Gasparyan made a number of excuses and stated that he would have the money in a few days, but never paid any of the debt owed or returned any of the merchandise.

As collateral and/or partial payment for the debt owed, Mr. Gasparyan gave Mr. Sarikov a 1.82 carat princess cut diamond (E color, SI1 clarity). That diamond, in a Tiffany setting, was taken from Craig Studley by Karen Gasparyan on or about July 31, 2013. Steve Whitney explained to Mr. Sarikov that the diamond was consistent with the one taken from Mr. Studley by Karen Gasparyan. Mr. Sarikov then contacted Mr. Studley and asked for him to describe the stone. Mr. Studley explained that it was a 1.82 carat, princess-cut diamond (E color, SI1 clarity), set in a Tiffany mounting. Mr. Sarikov then returned that diamond and the mounting to Mr. Studley, without compensation.

Mr. Sarikov learned from Steve Whitney that Karen Gasparyan sold jewelry to Mohinder Grover at the Gold Exchange, located at 3140 S. Parker Road in Aurora, Colorado. Mr. Sarikov subsequently went to the Gold Exchange and located several of his items taken by Mr. Gasparyan. Specifically, the three gold rings (\$1,100), the diamond bracelet (\$900), and the two sets of earrings (\$400) were located for sale in the showcase at the Gold Exchange. In total, six separate pieces of jewelry that were taken by Mr. Gasparyan were found for sale at the Gold Exchange. To document what he saw, Mr. Sarikov took several camera-phone pictures of his items while they were displayed for sale in the Gold Exchange showcase.

Mohinder Grover admitted purchasing the items from Karen Gasparyan and refused to return them to Mr. Sarikov.

Additionally, Karen Gasparyan sold a similar Tiffany ring to Kim Nguyen in early August of 2013. He subsequently stole the ring by offering to buy it back and then failing to pay for it.

Gabriel Sarikov suffered a total loss of \$16,150 as a result of his dealings with Karen Gasparyan.

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### COUNT THREE

THEFT - \$20,000 OR MORE, C.R.S. 18-4-401(1),(2)(D)  
(Class 3 Felony)

On or about and between January 1, 2013 and June 1, 2013, in the City of Aurora of Arapahoe County, in the State of Colorado, KAREN GASPARYAN, unlawfully, feloniously and knowingly obtained or exercised control over a thing of value, namely: a NECKLACE and/or EARRINGS, of MARK KATSNELSON and/or SLAVA KATSNELSON, with the value of twenty thousand dollars or more, without authorization, or by threat or deception, and knowingly used, concealed, or abandoned the thing of value in such manner as to permanently deprive MARK KATSNELSON and/or SLAVA KATSNELSON of its use or benefit; in violation of section 18-4-401(1),(2)(D) C.R.S. (Class 3 Felony), and against the peace and dignity of the People of the State of Colorado.

### COUNT FOUR

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H)  
(Class 4 Felony)

On or about and between January 1, 2013 and September 25, 2013, in the City of Aurora of Arapahoe County, in the State of Colorado, MOHINDER GROVER and/or GOLD EXCHANGE, unlawfully, feloniously and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: A NECKLACE, of MARK KATSNELSON and/or SLAVA KATSNELSON, with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and knowingly used, concealed, or abandoned the thing of value in such manner as to permanently deprive MARK KATSNELSON and/or SLAVA KATSNELSON of its use or benefit; in violation of section 18-4-401(1),(2)(H) C.R.S. (Class 4 Felony), and against the peace and dignity of the People of the State of Colorado.

**COUNT FIVE**

THEFT - \$20,000 OR MORE, C.R.S. 18-4-401(1),(2)(D)  
(Class 3 Felony)

On or about and between May 1, 2013 and May 22, 2013, in the City of Englewood of Arapahoe County, in the State of Colorado, KAREN GASPARYAN, unlawfully, feloniously and knowingly obtained or exercised control over a thing of value, namely: ROLEX WATCHES, of DANIEL LEYMAN, with the value of twenty thousand dollars or more, without authorization, or by threat or deception, and knowingly used, concealed, or abandoned the thing of value in such manner as to permanently deprive DANIEL LEYMAN of its use or benefit; in violation of section 18-4-401(1),(2)(D) C.R.S. (Class 3 Felony), and against the peace and dignity of the People of the State of Colorado.

**COUNT SIX**

THEFT BY RECEIVING - \$1,000 - \$20,000, C.R.S. 18-4-410(1),(4)  
(Class 4 Felony)

On or about and between May 1, 2013 and May 22, 2013, in the City of Aurora of Arapahoe County, in the State of Colorado, MOHINDER GROVER and/or GOLD EXCHANGE, unlawfully and feloniously received, retained, loaned money by pawn or pledge, or disposed of a thing of value, namely: A ROLEX WATCH, of DANIEL LEYMAN, and the defendant knew or believed the thing of value had been stolen and intended to deprive the lawful owner, permanently of its use or benefit, and the value of the property was one thousand dollars or more but less than twenty thousand dollars; in violation of section 18-4-410(1),(4), C.R.S. (Class 4 Felony), and against the peace and dignity of the People of the State of Colorado.

**COUNT SEVEN**

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H)  
(Class 4 Felony)

On or about and between August 1, 2013 and September 1, 2013, in Cherry Hills Village of Arapahoe County, in the State of Colorado, KAREN GASPARYAN, unlawfully, feloniously and knowingly, without authorization or by threat or deception, obtained, retained or exercised control over property of another, namely: WATCHES, of NICHOLAS SPRUNG, with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and knowingly used concealed or abandoned the thing of value in such a manner as to permanently deprive NICHOLAS SPRUNG of its use or benefit; in violation of section 18-4-401(1),(2)(H) C.R.S. (Class 4 Felony), and against the peace and dignity of the People of the State of Colorado.

**COUNT EIGHT**

**THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H)  
(Class 4 Felony)**

On or about and between August 1, 2013 and September 25, 2013, in the City of Aurora of Arapahoe County, in the State of Colorado, MOHINDER GROVER and/or GOLD EXCHANGE, unlawfully, feloniously and knowingly, without authorization or by threat or deception, obtained, retained or exercised control over property of another, namely: WATCHES, of NICHOLAS SPRUNG, with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and knowingly used concealed or abandoned the thing of value in such a manner as to permanently deprive NICHOLAS SPRUNG of its use or benefit; in violation of section 18-4-401(1),(2)(H) C.R.S. (Class 4 Felony), and against the peace and dignity of the People of the State of Colorado.

**COUNT NINE**

**FRAUD BY CHECK - ACCOUNT CLOSED OR NO ACCOUNT,  
C.R.S. § 18-5-205(2),(3)(D) (Class 6 Felony)**

On or about and between August 1, 2013 and September 1, 2013, in Cherry Hills Village of Arapahoe County, in the State of Colorado, KAREN GASPARYAN, knowing he had insufficient funds with the drawee, WELLS FARGO BANK, with intent to defraud, unlawfully and feloniously issued a check drawn on an account which had been closed for a period of thirty days or more to NICHOLAS SPRUNG for payment of property; in violation of section 18-5-205(2),(3)(d), C.R.S. (Class 6 Felony), and against the peace and dignity of the People of the State of Colorado.

**COUNT TEN**

**FRAUD BY CHECK - ACCOUNT CLOSED OR NO ACCOUNT,  
C.R.S. § 18-5-205(2),(3)(D) (Class 6 Felony)**

On or about and between August 1, 2013 and September 1, 2013, in Cherry Hills Village of Arapahoe County, in the State of Colorado, KAREN GASPARYAN, knowing he had insufficient funds with the drawee, WELLS FARGO BANK, with intent to defraud, unlawfully and feloniously issued a check drawn on an account which had been closed for a period of thirty days or more to NICHOLAS SPRUNG for payment of property; in violation of section 18-5-205(2),(3)(d), C.R.S. (Class 6 Felony), and against the peace and dignity of the People of the State of Colorado.

**COUNT ELEVEN**

FRAUD BY CHECK - ACCOUNT CLOSED OR NO ACCOUNT,  
C.R.S. § 18-5-205(2),(3)(D) (Class 6 Felony)

On or about and between August 1, 2013 and September 1, 2013, in Cherry Hills Village of Arapahoe County, in the State of Colorado, KAREN GASPARYAN, knowing he had insufficient funds with the drawee, WELLS FARGO BANK, with intent to defraud, unlawfully and feloniously issued a check drawn on an account which had been closed for a period of thirty days or more to NICHOLAS SPRUNG for payment of property; in violation of section 18-5-205(2),(3)(d), C.R.S. (Class 6 Felony), and against the peace and dignity of the People of the State of Colorado.

**COUNT TWELVE**

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H)  
(Class 4 Felony)

On or about and between August 1, 2013 and August 7, 2013, in the City and County of Denver, in the State of Colorado, KAREN GASPARYAN, unlawfully, feloniously and knowingly obtained or exercised control over a thing of value, namely: DIAMONDS and/or JEWELRY, of KIM NGUYEN, with the value of twenty thousand dollars or more but less than one-hundred thousand dollars, without authorization, or by threat or deception, and knowingly used, concealed, or abandoned the thing of value in such manner as to permanently deprive KIM NGUYEN of its use or benefit; in violation of section 18-4-401(1),(2)(H) C.R.S. (Class 4 Felony), and against the peace and dignity of the People of the State of Colorado.

**COUNT THIRTEEN**

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H)  
(Class 4 Felony)

On or about August 7, 2013, in the City and County of Denver, in the State of Colorado, MOHINDER GROVER and/or GOLD EXCHANGE, unlawfully, feloniously and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: a DIAMOND, of KIM NGUYEN, with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and knowingly used, concealed, or abandoned the thing of value in such manner as to permanently deprive KIM NGUYEN of its use or benefit; in violation of section 18-4-401(1),(2)(H) C.R.S. (Class 4 Felony), and against the peace and dignity of the People of the State of Colorado

#### COUNT FOURTEEN

THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(G)  
(Class 5 Felony)

On or about and between July 30, 2013 and September 25, 2013, in the City and County of Denver, in the State of Colorado, KAREN GASPARYAN, unlawfully, feloniously and knowingly, without authorization or by threat or deception, obtained, retained or exercised control over property of another, namely: JEWELRY, of GABRIEL SARIKOV, with the value of more than five thousand dollars, but less than twenty thousand dollars, and knowingly used, concealed, or abandoned the thing of value in such a manner as to permanently deprive GABRIEL SARIKOV of its use or benefit, in violation of section 18-4-401(1),(2)(G) C.R.S. (Class 5 Felony), and against the peace and dignity of the People of the State of Colorado.

#### COUNT FIFTEEN

THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(F)  
(Class 5 Felony)

On or about and between July 30, 2013 and September 25, 2013, in the City of Aurora of Arapahoe County, in the State of Colorado, MOHINDER GROVER and/or GOLD EXCHANGE, unlawfully, feloniously and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: JEWELRY, of GABRIEL SARIKOV, with the value of five thousand dollars or more but less than twenty thousand dollars, and knowingly used, concealed, or abandoned the thing of value in such manner as to permanently deprive GABRIEL SARIKOV of its use or benefit; in violation of section 18-4-401(1),(2)(F) C.R.S. (Class 4 Felony), and against the peace and dignity of the People of the State of Colorado.

#### COUNT SIXTEEN

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H)  
(Class 4 Felony)

On or about and between July 30, 2013 and September 1, 2013, in the City of Aurora of Arapahoe County, in the State of Colorado, KAREN GASPARYAN, unlawfully, feloniously and knowingly, without authorization or by threat or deception, obtained, retained or exercised control over property of another, namely: DIAMONDS, of AVS WHOLESALE STUDIOS and/or CRAIG STUDLEY, with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and knowingly used, concealed, or abandoned the thing of value in such a manner as to permanently deprive AVS WHOLESALE STUDIOS and/or CRAIG STUDLEY of its use or benefit, in violation of section 18-4-401(1),(2)(H) C.R.S. (Class 4 Felony), and against the peace and dignity of the People of the State of Colorado.

**COUNT SEVENTEEN**

FRAUD BY CHECK - ACCOUNT CLOSED OR NO ACCOUNT,  
C.R.S. § 18-5-205(2),(3)(D) (Class 6 Felony)

On or about and between July 30, 2013 and September 1, 2013, in the City of Aurora of Arapahoe County, in the State of Colorado, KAREN GASPARYAN, knowing he had insufficient funds with the drawee, WELLS FARGO BANK, with intent to defraud, unlawfully and feloniously issued a check drawn on an account which had been closed for a period of thirty days or more to AVS WHOLESALE STUDIOS and/or CRAIG STUDLEY for payment of property; in violation of section 18-5-205(2),(3)(d), C.R.S. (Class 6 Felony), and against the peace and dignity of the People of the State of Colorado.

**COUNT EIGHTEEN**

FRAUD BY CHECK - ACCOUNT CLOSED OR NO ACCOUNT,  
C.R.S. § 18-5-205(2),(3)(D) (Class 6 Felony)

On or about and between July 30, 2013 and September 1, 2013, in the City of Aurora of Arapahoe County, in the State of Colorado, KAREN GASPARYAN, knowing he had insufficient funds with the drawee, WELLS FARGO BANK, with intent to defraud, unlawfully and feloniously issued a check drawn on an account which had been closed for a period of thirty days or more to AVS WHOLESALE STUDIOS and/or CRAIG STUDLEY for payment of property; in violation of section 18-5-205(2),(3)(d), C.R.S. (Class 6 Felony), and against the peace and dignity of the People of the State of Colorado.

The essential facts which support the offenses described in Counts Sixteen through Eighteen were committed in the State of Colorado in the following manner:

Craig Studley was introduced to Karen Gasparyan through Steve Whitney in late July of 2013. Mr. Studley is a diamond broker and jewelry designer who owns AVS Wholesale Jewelers, located at 17500 East 14<sup>th</sup> Drive in Aurora, Colorado. Mr. Studley knows Mr. Whitney from over twenty-five years of dealings in the jewelry business.

Mr. Gasparyan represented that he owned a pawn shop in Blackhawk and that he knew Russians who were interested in purchasing large diamonds and Rolex watches. Mr. Studley showed Mr. Gasparyan several diamonds, but Mr. Gasparyan said he wanted the finest diamonds and requested certified goods. Mr. Studley only agreed to do business with Mr. Gasparyan because Steve Whitney vouched for his credibility.

On or about July 31, 2013, Mr. Studley and/or AVS Wholesale Studios consigned four diamonds to Mr. Gasparyan, on memo. The following is a list of those diamonds given to Mr. Gasparyan on memo:

- 1.17 carat, G color and VS clarity for \$6,000.

- 1.11 carat, F color and VS2 clarity for \$5,100 + custom mounting for \$2,300.
- 3.12 carat, J color and SI2 clarity for \$10,000.
- 1.82 carat, E color and SI1 clarity in a Tiffany mounting for \$6,200.

On or about August 7, 2013, Mr. Gasparyan went back to AVS Wholesale Studios, without Steve Whitney and returned the 1.17 and 3.12 carat diamonds. He immediately asked Mr. Studley for two more one-carat certified diamonds.

Mr. Gasparyan told Mr. Studley that he sold the 1.11 and 1.82 carat diamonds. Karen Gasparyan only had \$2,000 in cash, but stated she would have the rest of the money soon. Mr. Gasparyan paid Mr. Studley the \$2,000 in cash, which he considered as payment for the custom mounting on the 1.11 carat diamond.

On or about August 7, 2013, Mr. Studley and/or AVS Wholesale Studios consigned two more diamonds to Mr. Gasparyan on memo. The following is a list of those diamonds and their agreed-upon prices:

- 1.02 carat, F color and VVS2 clarity for \$6,140.
- 1.20 carat F color and VVS2 clarity for \$8,000.

As collateral for the additional diamonds, Mr. Gasparyan uttered two checks to Mr. Studley, which were made out to VS Studios. Those checks are detailed as follows:

- Check #102, dated 8/12/13 for \$6,140 with a memo notation of "1.02 EGL F/VVS2".
- Check #103, dated 8/12/13 for \$8,000 with a memo notation of "1.20 EGL F/VVS2".

Both checks were written from Mr. Gasparyan's Wells Fargo checking account #1018804896, which was closed on December 24, 2012 for "Unsatisfactory Handling".

After several days passed and Mr. Studley did not hear back from Mr. Gasparyan, he became concerned that he was the victim of theft. Mr. Studley tried calling Mr. Gasparyan frequently and initially he would return the phone calls. After several weeks, Mr. Gasparyan's telephone number was disconnected and Mr. Studley did not hear from him again. Mr. Gasparyan never returned any of the remaining diamonds.

Mr. Studley attempted to cash the checks at Wells Fargo Bank but was informed that the checks would bounce.

Steve Whitney attempted to help Mr. Studley recover some of his diamonds by contacting several jewelers who were dealing with Karen Gasparyan. Mr. Whitney learned that Gabriel Sarikov, the owner of Montbello Pawn, received a diamond as collateral from Mr. Gasparyan.

Mr. Sarikov subsequently contacted Craig Studley and asked for him to describe the stone he was missing. Mr. Studley explained that one of the stones was a 1.82 carat, princess-cut diamond (E color, SI1 clarity), set in a Tiffany mounting. Realizing he was in possession of stolen property, Mr. Sarikov returned the 1.82 carat diamond and the mounting to Mr. Studley, without compensation.

Craig Studley and/or AVS Wholesale Studios suffered a loss of \$25,440 as a result of his dealings with Mr. Gasparyan.

### COUNT NINETEEN

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H)  
(Class 4 Felony)

On or about and between July 30, 2013 and August 30, 2013, in the City of Glendale of Arapahoe County, in the State of Colorado, KAREN GASPARYAN, unlawfully, feloniously and knowingly, without authorization or by threat or deception, obtained, retained or exercised control over property of another, namely: JEWELRY, of COLORADO GOLD MART, with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and knowingly used, concealed, or abandoned the thing of value in such a manner as to permanently deprive COLORADO GOLD MART of its use or benefit, in violation of section 18-4-401(1),(2)(H) C.R.S. (Class 4 Felony), and against the peace and dignity of the People of the State of Colorado.

The essential facts which support the offenses described in Count Nineteen were committed in the State of Colorado in the following manner:

On or about July 30, 2013, Steve Whitney and Karen Gasparyan went to Colorado Gold Mart, located at 1124 S. Colorado Boulevard in Glendale, Colorado. They met with manager Randy Piserchio, who has been close friends with Steve Whitney for forty-five years. Mr. Piserchio describes Mr. Whitney as naïve and disorganized, but stated that he never had any issues with Mr. Whitney stealing jewelry he would take out on memo.

Steve Whitney and Karen Gasparyan took several pieces of jewelry on memo, including several high-end watches. The following is a list of the items taken on memo by Steve Whitney and Karen Gasparyan on July 30, 2013:

- One Ladies Marquis Diamond Ring for \$3,500.
- One Cartier Pasha Stainless Steel Watch for \$2,500.
- One Panerai Daylight Model Watch for \$6,200.
- One Rolex Submariner Stainless Steel with Date Watch for \$5,500.
- One Rolex Submariner Stainless Steel without Date Watch for \$4,500.
- One Pendant and Diamond Earrings Set for \$1,800.
- One Rolex Men's Datejust Stainless Steel for \$3,500.
- One Panerai Men's Ferrari Watch for \$3,900.

- One 14 carat diamond bracelet for \$1,500.
- One Rolex Ladies Datejust for \$2,500.

These items had a total agreed upon price of \$35,400.

On or about August 1, 2013, Mr. Gasparyan returned with \$18,500 in cash. Mr. Piserchio deemed that amount to be in satisfaction of several items, including: the Ladies Marquis diamond ring (\$3,500), the 14 carat diamond bracelet (\$1,500), two Rolex Submariner watches (\$10,000), and the Rolex Men's Datejust (\$3,500). Mr. Gasparyan also returned the Rolex Ladies Datejust (\$2,500).

The items that were unreturned and not paid for from the July 30, 2013 transaction include: the Cartier Pasha watch (\$2,500), the Panerai Daylight Model watch (\$6,200), the Pendant and Diamond earrings set (\$1,800), and the Panerai Men's Ferrari watch (\$3,900). These unreturned items had a total agreed-upon price of \$14,400.

In total from July 30, 2013, Mr. Gasparyan satisfied \$21,000 out of \$35,400 he owed Colorado Gold Mart. Mr. Gasparyan did not make any additional payments or return any other jewelry in reference to the July 30, 2013 memo.

Colorado Gold Mart suffered a loss of \$14,400 from the July 30, 2013 transaction with Karen Gasparyan.

On or about August 1, 2013, after making partial payment for the jewelry he previously took on memo, Mr. Gasparyan asked Mr. Piserchio for more jewelry. The following is a list of the items taken on memo by Karen Gasparyan on August 1, 2013:

- One 5.9 carat tanzanite diamond ring for \$4,200.
- One Men's diamond ring for \$4,000.
- One Rolex Men's Stainless Steel Datejust for \$2,800.
- One Rolex Ladies Presidential for \$5,500.
- One 2.05 carat round brilliant diamond for \$19,000.
- One pair of 2 carat diamond stud earrings for \$4,500.
- One Cartier Tank watch for \$5,200.

These items had a total agreed upon price of \$45,200.

On or about August 6, 2013 Mr. Gasparyan returned the 5.9 carat tanzanite diamond ring (\$4,200), the Men's diamond ring (\$4,000), and the 2 carat diamond stud earrings (\$4,500). These items had a total agreed-upon value of \$12,700. Of the items taken on memo August 1, 2013, Mr. Gasparyan returned \$12,700 out of \$45,200.

The items that were unreturned from the August 1, 2013 transaction include: the Rolex Men's Stainless Steel Datejust (\$2,800), the Rolex Ladies Presidential (\$5,500), the 2.05 carat round brilliant diamond (\$19,000), and the Cartier Tank watch (\$5,200). These items had a total agreed-upon price of \$32,500.

None of these items were paid for or returned to Colorado Gold Mart.

Colorado Gold Mart suffered a loss of \$32,500 from the August 1, 2013 transaction with Karen Gasparyan.

After not receiving any more money for several days Mr. Piserchio began to call Steve Whitney and Karen Gasparyan on a daily basis. He requested that they immediately pay for or return the merchandise they took on memo. Mr. Piserchio continued to call every day for several weeks and was given numerous excuses and promises that they would have the money soon. Karen Gasparyan eventually stopped returning Mr. Piserchio's phone calls.

When Mr. Piserchio determined that Colorado Gold Mart was the victim of theft, he called the Glendale Police Department and filed a police report.

Mr. Gasparyan subsequently called Mr. Piserchio to ask if he had spoken to the police about their transactions. Mr. Gasparyan said there was no need to involve the police because he was in the process of getting the money. Mr. Gasparyan told Mr. Piserchio that he was waiting for a wire transfer from his family and that he would be able to pay his debt soon. Mr. Gasparyan offered Mr. Piserchio a white Lexus Sport Utility Vehicle, worth about \$50,000, as collateral for the debt. Mr. Gasparyan indicated that he would bring the vehicle, keys and title the next day but he never delivered the car despite his promises.

Steve Whitney attempted to recover some of the merchandise but was unsuccessful.

As a result of its dealings with Karen Gasparyan, Colorado Gold Mart suffered a total monetary loss of \$46,900. Mr. Piserchio subsequently repaid Colorado Gold Mart for the loss by withdrawing from money from his savings account, taking out cash advances, and liquidating gold coins.

#### COUNT TWENTY

THEFT - \$1,000 - \$20,000, C.R.S. § 18-4-401(1),(2)(C)  
(Class 4 Felony)

On or about and between November 9, 2011 and December 6, 2011, in the City and County of Denver, in the State of Colorado, KAREN GASPARYAN, unlawfully, feloniously and knowingly, obtained or exercised control over a thing of value, namely UNITED STATES CURRENCY, of FARMERS INSURANCE, with the value of one thousand dollars or more but less than twenty thousand dollars, without authorization, or by threat or deception, and knowingly used, concealed, or abandoned the thing of value in such a manner as to permanently deprive FARMERS INSURANCE of its use or benefit, in violation of section 18-4-401(1)(b),(2)(c) C.R.S. (Class 4 Felony), and against the peace and dignity of the People of the State of Colorado.

The essential facts which support the offenses described in Count Twenty were committed in the State of Colorado in the following manner:

On or about and between November 9, 2011 and December 6, 2011, Karen Gasparyan defrauded Farmers Insurance and/or Oleg Kmyta, by intentionally damaging Mr. Kmyta's Lexus RX350 in Denver, Colorado. Mr. Gasparyan was borrowing the vehicle from Mr. Kmyta and reported the car had been vandalized outside of a restaurant.

On or about November 10, 2011, Oleg Kmyta submitted an insurance claim to Farmers Insurance. After the insurance claim was submitted, Mr. Gasparyan informed Mr. Kmyta that he intentionally damaged his vehicle to make money on the insurance claim.

On or about December 6, 2011, Farmers Insurance issued a claim check for \$5,554.17. Mr. Kmyta subsequently cashed the check and Mr. Gasparyan took the money from him.

In total, Farmers Insurance suffered a loss of \$5,554.17 as a result of their interaction with Mr. Gasparyan.

#### COUNT TWENTY-ONE

THEFT - \$1,000 - \$20,000, C.R.S. § 18-4-401(1),(2)(C)  
(Class 4 Felony)

On or about and between December 20, 2011 and January 1, 2012, in Commerce City of Adams County, in the State of Colorado, KAREN GASPARYAN, unlawfully, feloniously and knowingly, obtained or exercised control over a thing of value, namely an AUTOMOBILE, of ANNA SERDYUK, with the value of one thousand dollars or more but less than twenty thousand dollars, without authorization, or by threat or deception, and knowingly used, concealed, or abandoned the thing of value in such a manner as to permanently deprive ANNA SERDYUK of its use or benefit, in violation of section 18-4-401(1)(b),(2)(c) C.R.S. (Class 4 Felony), and against the peace and dignity of the People of the State of Colorado.

#### COUNT TWENTY-TWO

FORGERY OF CHECKS OR COMMERCIAL INSTRUMENTS,  
C.R.S. § 18-5-102(1),(C) (Class 5 Felony)

On or about December 20, 2011, in Commerce City of Adams County, in the State of Colorado, KAREN GASPARYAN, with intent to defraud ANNA SERDYUK, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or

otherwise affected a legal right, interest, obligation, or status, namely: a BUSINESS CARD, WHICH FRAUDULENTLY IDENTIFIED KAREN GASPARYAN AS THE OWNER OF CARFLEX; in violation of section 18-5-102(1),(C), C.R.S. (Class 5 Felony), and against the peace and dignity of the People of the State of Colorado.

**COUNT TWENTY-THREE**

FRAUD BY CHECK - \$1,000 OR MORE, C.R.S. § 18-5-205(2),(3)(D)  
(Class 6 Felony)

On or about December 20, 2011, in the City and County of Denver, in the State of Colorado, KAREN GASPARYAN, knowing he had insufficient funds with the drawee, U.S. BANK, with intent to defraud, unlawfully and feloniously issued a check in the sum of one thousand dollars or more to ANNA SERDYUK for payment of property; in violation of section 18-5-205(2),(3)(d), C.R.S. (Class 6 Felony), and against the peace and dignity of the People of the State of Colorado.

The essential facts which support the offenses described in Counts Twenty-One through Twenty-Three were committed in the State of Colorado in the following manner:

On or about and between December 20, 2011 and January 1, 2012, Karen Gasparyan engaged in a course of conduct designed to commit theft from Anna Serdyuk and/or her husband Arkadi Shamayev. Mr. Gasparyan first asked Alex Yaacobov, Ms. Serdyuk's relative, if she would be interested in selling her 2006 Acura TSX.

Ms. Serdyuk, Mr. Shamayev and Mr. Yaacobov subsequently met with Mr. Gasparyan at Carflex, located at 6657 Colorado Boulevard, in Commerce City, Colorado. Mr. Gasparyan represented himself as the owner of Carflex and presented a business card indicating the same.

Stanislaw Nowacki is the actual owner of Carflex, whereas Mr. Gasparyan has no legitimate or actual business interest in the company.

After presenting himself as the owner of Carflex, Mr. Gasparyan showed Ms. Serdyuk a Toyota that she was interested in purchasing. Ms. Serdyuk agreed to sell her Acura to Mr. Gasparyan for \$12,000 and he stated that he would begin the process of getting the Toyota from the auto auction. Mr. Gasparyan took possession of Ms. Serdyuk's Acura, but told her there would be a delay before the paperwork could be completed on the Toyota.

Ms. Serdyuk, Mr. Shamayev, and Mr. Yaacobov entered the business to fill out paperwork when they noticed a pile of Carflex business cards sitting on the desk. The business cards indicated that Stanislaw Nowacki was the owner of Carflex. When Ms. Serdyuk inquired about the business cards, Karen Gasparyan picked them up and threw them in the trash. He said Mr. Nowacki was just his partner.

Mr. Gasparyan had Ms. Serdyuk execute a retail purchase agreement with Carflex for the sale of her 2006 Acura TSX. The purchase agreement was dated December 20, 2011 and signed by Anna Serdyuk. Mr. Gasparyan deliberately omitted a purchase price from the document when Ms. Serdyuk signed the retail purchase agreement.

Karen Gasparyan gave the purchase agreement to Stanislaw Nowacki and a sales price of \$5,800 was entered.

Mr. Gasparyan then presented Carflex check #7114, made out to Anna Serdyuk for \$5,800 and told her that he needed \$4,000 back before the auto auction would release the Toyota. Ms. Serdyuk subsequently deposited the Carflex check into her bank account and withdrew \$4,000 which was given to Karen Gasparyan. At this point, Mr. Gasparyan possessed both Ms. Serdyuk's car and money.

The Toyota was never delivered to Ms. Serdyuk as promised and she became suspicious that she was the victim of theft. Mr. Gasparyan continued to make excuses and was ultimately confronted by Alex Yaacobov about the car.

Mr. Gasparyan eventually stated that the purchase of the Toyota had fallen through and offered to give them a check for \$11,000. Mr. Gasparyan subsequently uttered check #139 to Mr. Yaacobov for \$11,000, which was drawn on Evelina Makaryan's U.S. Bank checking account. Ms. Makaryan is Karen Gasparyan's mother.

When Ms. Serdyuk attempted to deposit the check, she learned the account had insufficient funds to cover the transaction.

When Mr. Yaacobov confronted Mr. Gasparyan about the bad check, Mr. Gasparyan threatened him. On or about January 1, 2012, Ms. Serdyuk and Mr. Yaacobov went to the Aurora Police Department to report the theft. However, Mr. Nowacki subsequently presented the purchase agreement and the Aurora Police deemed the matter civil in nature.

In total, Anna Serdyuk and/or Arkadi Shamayev suffered a financial loss in excess of \$10,000 as a result of their dealings with Karen Gasparyan.

#### **COUNT TWENTY-FOUR**

FRAUD BY CHECK - \$1,000 OR MORE, C.R.S. § 18-5-205(2),(3)(D)  
(Class 6 Felony)

On or about December 12, 2012, in the City and County of Denver, in the State of Colorado, KAREN GASPARYAN, knowing he had insufficient funds with the drawee, WELLS FARGO BANK, with intent to defraud, unlawfully and feloniously issued a check in the sum of one thousand dollars or more to MARK KATSNELSON and/or KAT'S PAWN SHOP for payment of property; in violation of section 18-5-205(2),(3)(d), C.R.S. (Class 6 Felony), and against the peace and dignity of the People of the State of Colorado.

COUNT TWENTY-FIVE

FRAUD BY CHECK - \$1,000 OR MORE, C.R.S. § 18-5-205(2),(3)(D)  
(Class 6 Felony)

On or about December 12, 2012, in the City and County of Denver, in the State of Colorado, KAREN GASPARYAN, knowing he had insufficient funds with the drawee, WELLS FARGO BANK, with intent to defraud, unlawfully and feloniously issued a check in the sum of one thousand dollars or more to MARK KATSNELSON and/or KAT'S PAWN SHOP for payment of property; in violation of section 18-5-205(2),(3)(d), C.R.S. (Class 6 Felony), and against the peace and dignity of the People of the State of Colorado.

The essential facts which support the offenses described in Counts Twenty-Four and Twenty-Five were committed in the State of Colorado in the following manner:

Mark Katsnelson is the owner of Kat's Pawn Shop in Lakewood, Colorado. During 2012, Mr. Katsnelson tried to help Mr. Gasparyan by teaching him the pawn business and giving him jewelry, coins and watches to sell on memo. Mr. Katsnelson estimates that he gave Mr. Gasparyan several hundred thousand dollars in high-end jewelry, coins, watches and precious metals, on memo during 2012. Mr. Gasparyan failed to return or pay for most of the items over an extended period of time.

On or about December 12, 2012, Mr. Gasparyan signed and uttered two "starter" checks to pay his debt for the jewelry, coins and watches that he took on memo from Mr. Katsnelson. Mr. Gasparyan instructed Mr. Katsnelson to fill out the remainder of each check because Mr. Gasparyan does not write English.

Check #096 was dated December 12, 2012 and made out to Mark Katsnelson for \$45,000.

Check #098 was dated December 12, 2012 and made out to Mark Katsnelson for \$38,000.

Both checks were drawn from Wells Fargo Account #1018804896, which was opened on December 7, 2012 with only a \$100 deposit.

Within five days of opening his account at Wells Fargo checking account for only \$100, Karen Gasparyan signed and uttered two checks to Mr. Katsnelson for a total of \$83,000.

Mr. Katsnelson subsequently went to Wells Fargo and learned that the account had insufficient funds to cover the transaction.

Mark Katsnelson suffered a pecuniary loss in excess of \$83,000 as a result of his dealings with Karen Gasparyan.

**COUNT TWENTY-SIX**

THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(G)  
(Class 5 Felony)

On or about and between May 29, 2013 and July 1, 2013, in Commerce City of Adams County, in the State of Colorado, KAREN GASPARYAN, unlawfully, feloniously and knowingly, without authorization or by threat or deception, obtained, retained or exercised control over property of another, namely: UNITED STATES CURRENCY, of LAURA MURADYAN and/or KIM KIMBALL, with the value of more than five thousand dollars, but less than twenty thousand dollars, and knowingly used, concealed, or abandoned the thing of value in such a manner as to permanently deprive LAURA MURADYAN and/or KIM KIMBALL of its use or benefit, in violation of section 18-4-401(1),(2)(G) C.R.S. (Class 5 Felony), and against the peace and dignity of the People of the State of Colorado.

**COUNT TWENTY-SEVEN**

THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(G)  
(Class 5 Felony)

On or about May 31, 2013, in the City of Englewood of Arapahoe County, in the State of Colorado, KAREN GASPARYAN, unlawfully, feloniously and knowingly, without authorization or by threat or deception, obtained, retained or exercised control over property of another, namely: a ROLEX WATCH and/or JEWELRY, of LAURA MURADYAN, with the value of more than five thousand dollars, but less than twenty thousand dollars, and knowingly used, concealed, or abandoned the thing of value in such a manner as to permanently deprive LAURA MURADYAN of its use or benefit, in violation of section 18-4-401(1),(2)(G) C.R.S. (Class 5 Felony), and against the peace and dignity of the People of the State of Colorado.

**COUNT TWENTY-EIGHT**

THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(G)  
(Class 5 Felony)

On or about and June 10, 2013, in the City of Englewood of Arapahoe County, in the State of Colorado, KAREN GASPARYAN, unlawfully, feloniously and knowingly, without authorization or by threat or deception, obtained, retained or exercised control over property of another, namely: a ROLEX WATCH and/or JEWELRY, of KIM KIMBALL, with the value of more than five thousand dollars, but less than twenty thousand dollars, and knowingly used, concealed, or abandoned the thing of value in such a manner as to permanently deprive KIM KIMBALL of its use or benefit, in violation of section 18-4-401(1),(2)(G) C.R.S. (Class 5 Felony), and against the peace and dignity of the People of the State of Colorado.

COUNT TWENTY-NINE

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H)  
(Class 4 Felony)

On or about and between June 1, 2013 and July 1, 2013, in the City of Littleton of Arapahoe County, in the State of Colorado, KAREN GASPARYAN, unlawfully, feloniously and knowingly, without authorization or by threat or deception, obtained, retained or exercised control over property of another, namely: A LEXUS AUTOMOBILE, of LAURA MURADYAN and/or KIM KIMBALL, with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and knowingly used, concealed, or abandoned the thing of value in such a manner as to permanently deprive LAURA MURADYAN and/or KIM KIMBALL of its use or benefit, in violation of section 18-4-401(1),(2)(H) C.R.S. (Class 4 Felony), and against the peace and dignity of the People of the State of Colorado.

COUNT THIRTY

FRAUD BY CHECK - ACCOUNT CLOSED OR NO ACCOUNT,  
C.R.S. § 18-5-205(2),(3)(D) (Class 6 Felony)

On or about and between August 1, 2013 and September 1, 2013, in the City of Aurora of Arapahoe County, in the State of Colorado, KAREN GASPARYAN, knowing he had insufficient funds with the drawee, WELLS FARGO BANK, with intent to defraud, unlawfully and feloniously issued a check drawn on an account which had been closed for a period of thirty days or more to LAURA MURADYAN and/or KIM KIMBALL for payment of property; in violation of section 18-5-205(2),(3)(d), C.R.S. (Class 6 Felony), and against the peace and dignity of the People of the State of Colorado.

COUNT THIRTY-ONE

FRAUD BY CHECK - ACCOUNT CLOSED OR NO ACCOUNT,  
C.R.S. § 18-5-205(2),(3)(D) (Class 6 Felony)

On or about and between August 1, 2013 and September 1, 2013, in the City of Aurora of Arapahoe County, in the State of Colorado, KAREN GASPARYAN, knowing he had insufficient funds with the drawee, WELLS FARGO BANK, with intent to defraud, unlawfully and feloniously issued a check drawn on an account which had been closed for a period of thirty days or more to LAURA MURADYAN and/or KIM KIMBALL for payment of property; in violation of section 18-5-205(2),(3)(d), C.R.S. (Class 6 Felony), and against the peace and dignity of the People of the State of Colorado.

The essential facts which support the offenses described in Counts Twenty-Six through Thirty-One were committed in the State of Colorado in the following manner:

On or about May 29, 2013, Laura Muradyan was involved in a car accident which totaled her vehicle and left her with an insurance check for approximately \$10,500. Mr. Gasparyan offered to help Ms. Muradyan purchase a vehicle through the auto auction.

Ms. Muradyan, her husband Kim Kimball, along with Mr. Gasparyan, went to the auto auction and found a vehicle they wanted to purchase. They picked out a vehicle that they liked and Mr. Gasparyan agreed to sell them the vehicle in exchange for a total of \$15,000. Ms. Muradyan subsequently gave Mr. Gasparyan the proceeds from her insurance check and an extra \$4,500 of her savings.

Mr. Gasparyan indicated that the vehicle they purchased needed to be fixed and told Ms. Muradyan and Mr. Kimball that he would take the car to Carflex for repairs. Ms. Muradyan and Mr. Kimball never received the vehicle they agreed to purchase from Karen Gasparyan.

Ms. Muradyan and/or Mr. Kimball suffered a pecuniary loss of \$15,000 as a result of the preceding transaction.

Mr. Gasparyan also convinced Ms. Muradyan that she could improve her credit score by purchasing luxury items and then returning them. On or about May 31, 2013, Ms. Muradyan, Michael Leyman, and Mr. Gasparyan went to Williams Jewelers, located at 5106 South Broadway in Englewood, Colorado. At Mr. Gasparyan's urging, Ms. Muradyan purchased the following items:

- One Rolex watch for \$8,100.
- One pair of Love-Knot earrings for \$632.20.
- One diamond lariat necklace for \$1,300.

When they left Williams Jewelers, Karen Gasparyan had possession of the bag with all of the jewelry and Ms. Muradyan never saw any of it again. The merchandise was never paid for or returned to Williams Jewelers. Additionally, Karen Gasparyan instructed the sales people at Williams Jewelers to put his name on the Rolex warranty card.

As a result of this transaction, Ms. Muradyan suffered a loss in excess of \$10,000.

On or about June 1, 2013, believing she was helping her credit score, Laura Muradyan went to Kuni Lexus with Karen Gasparyan and Michael Leyman. Kuni Lexus is located at 6160 South Broadway in Littleton, Colorado.

Mr. Gasparyan suggested that Ms. Muradyan attempt to obtain financing for a vehicle, in order to see if her credit score improved. Ms. Muradyan was subsequently approved for credit and agreed to purchase a 2013 Lexus RX350 for a price of \$50,609, with no money down. Mr. Gasparyan took the vehicle and agreed to make the payments and/or return the vehicle. Ms. Muradyan never saw the Lexus RX350 again and it was never returned to Kuni Lexus. No payments were ever made on the vehicle.

Ms. Muradyan subsequently reported the stolen car to Lexus and they attempted to locate the vehicle using a remote signal. To date, Lexus is unable to locate the vehicle because the signal is not responding.

Ms. Muradyan and/or Mr. Kimball suffered a pecuniary loss of over \$50,000 as a result of the transaction with Karen Gasparyan and Kuni Lexus.

Knowing Mr. Kimball was looking for a new career opportunity, Mr. Gasparyan subsequently offered him a job working as a manager at Carflex. Mr. Gasparyan told Mr. Kimball that if he was going to be a manager he needed a nice watch. Mr. Kimball quit his job in reliance on Mr. Gasparyan's representation.

On or about June 10, 2013, Kim Kimball went to Williams Jewelers with Karen Gasparyan. At Williams Jewelers Mr. Kimball was disinterested in the purchasing process and frequently went outside to smoke while Mr. Gasparyan picked out a Rolex watch and diamond earrings for over \$11,000, which were purchased using Mr. Kimball's credit.

Mr. Gasparyan again had the sales people at Williams Jewelers put his name on the Rolex warranty card and took possession of both items before he left the store. Mr. Kimball had reservations about needing such a nice watch and asked for it back, but Mr. Gasparyan insisted on holding it. Mr. Kimball never saw the Rolex watch or diamond earrings again.

Mr. Kimball suffered a pecuniary loss of over \$11,000 as a result of his trip to Williams Jewelers with Karen Gasparyan.

Subsequently, Mr. Gasparyan took Ms. Muradyan and Mr. Kimball to Carflex to show them that their first car was being repaired. Mr. Kimball inquired if the employees would be the ones he would be supervising in his new position as manager. Mr. Gasparyan said that those employees worked a different shift and that they would be in on Monday.

Mr. Gasparyan later called and told Mr. Kimball not to come to work that Monday. He said he would need a few days to get things worked out, but that Mr. Kimball would be starting soon. Mr. Gasparyan continued to make excuses and delay, but Mr. Kimball never worked one day at Carflex.

On or about and between June 1, 2013 and June 30, 2013, Mr. Gasparyan informed Ms. Muradyan and Mr. Kimball that the purchase of their vehicle had fallen-through and offered to give them two checks.

Mr. Gasparyan subsequently signed and uttered two checks to Laura Muradyan and/or Arkadi Shamayev. Details of the checks are as follows:

- Check #175 was undated and made out for \$9,000.
- Check #176 was undated and made out for \$6,000.

Both checks were written from Wells Fargo checking account #1018804896, which was closed on December 24, 2012 for "Unsatisfactory Handling".

Ms. Muradyan and Mr. Kimball subsequently suspected that they were the victims of theft and made a police report.

Ms. Muradyan and Mr. Kimball suffered a total loss in excess of \$75,000 and were forced to declare bankruptcy, as a result of their dealings with Karen Gasparyan.

### COUNT THIRTY-TWO

THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(G)  
(Class 5 Felony) [08A14]

On or about September 22, 2013, in the City of Aurora of Arapahoe County, in the State of Colorado, MOHINDER GROVER, unlawfully, feloniously and knowingly, without authorization or by threat or deception, obtained, retained or exercised control over property of another, namely: BICYCLES, of COLORADO CYCLING CONNECTION and/or WADE WASHBURN, with the value of more than five thousand dollars, but less than twenty thousand dollars, and knowingly used, concealed, or abandoned the thing of value in such a manner as to permanently deprive COLORADO CYCLING CONNECTION and/or WADE WASHBURN of its use or benefit, in violation of section 18-4-401(1),(2)(G) C.R.S. (Class 5 Felony), and against the peace and dignity of the People of the State of Colorado.

The essential facts which support the offense described in Count Thirty-Two were committed in the State of Colorado in the following manner:

On or about September 22, 2013, police were called for a burglary report at Colorado Cycle Connection, located at 3316 Tejon Street in Denver, Colorado. On that date, several high-end bicycles were stolen from the store.

During the course of the investigation, police learned that two high-end bicycles were sold to Mohinder Grover at the Gold Exchange, located at 3140 S. Parker Road in Aurora, Colorado. Pawn records indicate that two bicycles were sold by Christopher Archuleta to the Gold Exchange, on or about September 22, 2013. The information further indicates that the Gold Exchange paid \$500 per bicycle and an employee with the initials "M.G." identified the condition of the bicycles as heavily used.

On or about September 30, 2013, police responded to the Gold Exchange to further investigate the stolen bicycles. Mohinder Grover stated that he had purchased the bicycles from Christopher Archuleta. Mr. Grover further explained that he had moved the bicycles off-site and he would need some time to locate them. Police were able to recover the bicycles and return them to Colorado Cycle Connection.

When the bicycles were recovered, they were in brand new condition with the exception that each serial number was destroyed. One bicycle was a red 2013 BMC Gran Fondo which retailed for \$2,499. The second bicycle is a white 2013 BMC Gran Fondo which retailed for \$2,699 at Colorado Cycle Connection.

When the white 2013 BMC Gran Fondo was recovered it still had the price tag on it which read, "\$2,699.99." Although the price tag remained on bicycle, the bar code was torn away from the price tag. Despite having the price tag still on the bicycle, Mr. Grover paid \$500 and reported that it was heavily used.

In total, Mr. Grover was in possession of over \$5,198 in stolen merchandise.

JOHN W. SUTHERS  
Attorney General

  
DANIEL PIETRAGALLO, #41794  
Assistant Attorney General  
Financial Fraud Unit  
Criminal Justice Section