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VENTURA
SUPERIOR COURT
FILED

JUL 18 2013

MICHAEL D. PLANET
Executive Officer and Clerk
Deputy

SUPERIOR COURT OF CALIFORNIA
COUNTY OF VENTURA

THE PEOPLE OF THE STATE OF CALIFORNIA,

vs

AVI HVIV GOZLAN (10-03-1964)
INBAL GINDEL BENDOV (10-10-1981)
MOLLY MAZAL AFARGAN (05-04-1972)
DORON SHAHAM (06-18-1974)

Defendant(s).

VCIJIS Case: 2013019297

INDICTMENT

The Ventura County Grand Jury hereby accuses the above-named defendant as follows:

COUNT 1

On or about January 01, 2005 through October 18, 2012, in the above named Judicial District, the crime of CONSPIRACY TO COMMIT A CRIME, in violation of Penal Code 182(a)(1), a Felony, was committed by AVI HVIV GOZLAN and INBAL GINDEL BENDOV and MOLLY MAZAL AFARGAN and DORON SHAHAM, who did unlawfully conspire with another person and persons to commit the crime of conspiracy to contract without a license, in violation of Section 7028 of the Business and Professions Code Code, a felony; that pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, the said defendant committed at least one of the following overt act and acts at and in the County of Ventura.

OVERT ACT NO. 1. In or about 2005, Arnold Surnow agreed to rent his contractor's license to AVI HVIV GOZLAN for \$650 per month for the purpose of AVI HVIV GOZLAN operating a home improvement company called "Liberty Construction."

OVERT ACT NO. 2. In or about 2008, AVI HVIV GOZLAN and Arnold Surnow agreed that Surnow would advertise for LIBERTY CONSTRUCTION and UNIVERSAL REMODELING for which Surnow was paid approximately \$1,000 per week.

OVERT ACT NO. 3. In or about November of 2009, Henry Morris Jacobs and AVI HVIV GOZLAN agreed that Henry Morris Jacobs would rent his contractor's license to AVI HVIV GOZLAN for \$1,250 per month.

OVERT ACT NO. 4. In or about November and December of 2009, AVI HVIV GOZLAN and Henry Morris Jacobs agreed they would form a home remodeling business called "VIP Home Design" and the company would use Henry Morris Jacobs' contractor license number, but would be operated by AVI HVIV GOZLAN.

OVERT ACT NO. 5. On or about 4/30/10, within the County of Ventura, VIP Home Design salesman Avi B. Dov presented Marilyn Passolt with a color glossy folder containing documentation for VIP Home Design, and entered into a home improvement contract for \$8,421.

OVERT ACT NO. 6. On or about 5/9/10, within the County of Ventura, VIP Home Design salesperson Jacob Levy presented 69-year-old Darlene Roker with a color glossy folder containing documentation for VIP Home Design, and entered into a home improvement contract for \$20,950.

OVERT ACT NO. 7. In or about 2010, Stephen Ritz and AVI HVIV GOZLAN agreed that Stephen Ritz would rent his contractor's license to AVI HVIV GOZLAN and that they would form a home remodeling business called "Vista Home Improvements." AVI HVIV GOZLAN and Ritz agreed that AVI HVIV GOZLAN would use the contractor license number of Ritz, but the company would be operated by AVI HVIV GOZLAN.

OVERT ACT NO. 8. On or about 6/3/10, Stephen Ritz and AVI HVIV GOZLAN opened up a bank account at Bank of America in the name of Vista Home Improvements, Inc. identifying Stephen Ritz as the "President" and AVI HVIV GOZLAN as an "Officer" and agreed both would have authority to access funds from the Account.

OVERT ACT NO. 9. On or about 7/16/10, within the County of Ventura, a VIP Home Design salesperson presented 70-year-old Winona Hill with a color glossy folder containing documentation for VIP Home Design, and entered into a home improvement contract for \$6,700.

OVERT ACT NO. 10. On or about 8/30/10, Henry Morris Jacobs and AVI HVIV GOZLAN, opened a bank account at the Bank of America for VIP Home Design, Inc. stating that Jacobs was "President" and AVI HVIV GOZLAN was an "Officer" and agreed both would have authority to access funds from the Account.

OVERT ACT NO. 11. On or about 10/25/10, within the County of Ventura, unregistered VIP Home Design salesperson Ely Kavon presented 89-year-old Helen Yunker with a color glossy folder containing documentation for VIP Home Design, and entered into a home improvement contact for \$17,000.

OVERT ACT NO. 12. On or about 10/25/10, MAZAL MOLLY AFARGAN, acting as the AMCO Production Manager, approved BG Tile & Construction to performed home improvement subcontracting work at 89-year-old Helen Yunker's residence in the County of Ventura.

OVERT ACT NO. 13. On or about 10/27/10, within the County of Ventura, unregistered VIP Home Design salesperson Ely Kavon presented 89-year-old Helen Yunker with a religious gift consisting of a necklace from Jerusalem with holy water from the river Jordan, and subsequently entered into home improvement contract/addendum #2 for home improvement work to be performed at her home for \$12,500.

OVERT ACT NO. 14. On or about 11/1/10, within the County of Ventura, unregistered VIP Home Design salesperson Ely Kavon sold 89-year-old Helen Yunker contract/addendum #3 with VIP for home improvement work to be performed at her home for \$21,175.

OVERT ACT NO. 15. On or about 11/3/10, within the County of Ventura, unregistered VIP Home Design salesperson Ely Kavon sold 89-year-old Helen Yunker another contract/addendum #4 with VIP for home improvement work to be performed at her home for \$9,625.

OVERT ACT NO. 16. On or about 11/5/10, within the County of Ventura, unregistered VIP Home Design salesperson Ely Kavon, and salesperson Yaniv Ben Dov, sold 89-year-old Helen Yunker another contract/addendum #5 with VIP for home improvement work to be performed at her home for \$23,400.

OVERT ACT NO. 17. On or about 11/12/10, within the County of Ventura, unregistered VIP Home Design salesperson Ely Kavon, and salesperson Yaniv Ben Dov, sold 89-year-old Helen Yunker another contract/addendum #6 with VIP for more home improvement work to be performed at her home for \$9,500.

OVERT ACT NO. 18. On or about 11/25/10, within the County of Ventura, unregistered VIP Home Design salesperson Ely Kavon presented Lawrence Cardozo with a color glossy folder containing documentation for VIP Home Design, and entered into a home improvement contract for \$4,500.

OVERT ACT NO. 19. In or about April 2011, after the Contractors State License Board began an investigation into the Helen Yunker home remodeling project, AMCO employee Debra Lynn Mabrie told Henry Morris Jacobs to attend a meeting at the Contractors State License Board to discuss the Yunker home remodeling projects.

OVERT ACT NO. 20. In or about April 2011, Henry Morris Jacobs created a "fake file" on the Helen Yunker home remodeling projects, and included the contracts that Debra Lynn Mabrie provided to him, for the purpose of deceiving the Contractors State Licensing Board.

OVERT ACT NO. 21. In or about June of 2011, within the County of Ventura, Liberty Construction salesman "Gil" provided Timothy Urton with a color glossy folder containing information on Liberty Construction, and sold Timothy Urton a contract for home improvement in the amount of \$12,000.

OVERT ACT NO. 22. On or about 1/16/12, within the county of Ventura, Liberty Construction salesman DON SHAHAM provided Diane Vandeth with a color glossy folder containing information on Liberty Construction, and sold Diane Vandeth a home improvement contract in the amount of \$24,600.

OVERT ACT NO. 23. On or about 4/9/12, Donald Gene Briggs and AVI HVIV GOZLAN agreed that they would form a home remodeling business called "Horizon Home Design" and the company would use Donald Gene Briggs' contractor license number, but would be operated by AVI HVIV GOZLAN. AVI HVIV GOZLAN agreed to rent Briggs' license for \$1,250 per month.

OVERT ACT NO. 24. On or about 5/25/12, INBAL BENDOV entered into an agreement to open a "virtual office" in Woodland Hills, California on behalf of Horizon Home Design.

OVERT ACT NO. 25. On or about 7/7/12, within the County of Ventura, Liberty Construction salesperson Rosanna Bongiorno provided 71-year-old Carl Brown with a color glossy folder containing information on Liberty Construction, and sold Carl Brown a home improvement contract for \$18,000.

OVERT ACT NO. 26. On or about 7/9/12, within the County of Ventura, Vista Home Improvement salesman Rami Ray Shlomi provided 66-year-old Jeanne Grant with a color glossy folder containing information for Vista Home Improvement and sold her a home improvement contract for \$251,800.

OVERT ACT NO. 27. On or about 7/13/12, within the County of Ventura, VIP Home Design salesman Shahar "Johnny" Cywiak went to Darlene Roker's home in Ventura, CA and submitted a bid of \$8,750 to paint her house in the presence of an undercover District Attorney Investigator.

OVERT ACT NO. 28. On or about 8/13/12, Brooke Valiente from VIP Home Design used an alias of "Taylor" and called an undercover District Attorney Investigator, within the County of Ventura, and falsely claimed that the owner of VIP Home Design was Henry "Hank" Jacobs, and that "Vista" was the company commercial division.

OVERT ACT NO. 29. On or about 8/1/12, INBAL BENDOV entered into an agreement to open a "virtual office" in Woodland Hills, California on behalf of Universal Remodeling.

OVERT ACT NO. 30. On or about 10/2/12, INBAL BENDOV entered into an agreement to open a "virtual office" in Woodland Hills, California on behalf of Liberty Construction.

OVERT ACT NO. 31. On or about 10/18/12, after being served with a temporary restraining order identifying that law enforcement had seized bank funds for VIP Home Design, Amco Inc., Liberty Construction and Vista Home Improvements, INBAL BENDOV instructed Donald Gene Briggs to remove "as much money as he could" from the Horizon Home Design bank account, and provide it to her in the form of a cashier's check made payable to "General Remodeling."

OVERT ACT NO. 32. On or about 10/18/12, after being served with a temporary restraining order identifying that law enforcement had seized bank funds for VIP Home Design, Amco Inc., Liberty Construction and Vista Home Improvements, INBAL BENDOV instructed William Littlefield to remove "as much money as he could" from the Universal Remodeling bank account, and provide it to her.

OVERT ACT NO. 33. On or about 10/18/12, after being served with a temporary restraining order identifying that law enforcement had seized bank funds for VIP Home Design, Amco Inc., Liberty Construction and Vista Home Improvements, INBAL BENDOV took a cashier's check in the amount of \$45,000 from Horizon Home Design and a check of unknown amount from Universal Remodeling and gave the funds to Simon Cohen of Silverstar Construction.

COUNT 2

On or about April 30, 2010 through November 08, 2010, in the above named Judicial District, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of Penal Code 487(a), a Felony, was committed by AVI HVIV GOZLAN, who did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit money the property of Marilyn Passolt.

Special Allegation 1

It is further alleged, pursuant to Penal Code section 186.11(a)(1), that offenses set forth in counts 2,4,7,9,19,20,22,23, and 24 are related felonies, a material element of which is fraud, which involve a pattern of related felony conduct, and the pattern of related felony conduct involved the taking of more than One Hundred Thousand Dollars (\$100,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

Special Allegation 2

It is further alleged that in the commission of the above offense(s) the said defendant AVI HVIV GOZLAN, with the intent to do so, took, damaged and destroyed property of a value exceeding \$200,000, within the meaning of Penal Code Section 12022.6(a)(2).

COUNT 3

On or about May 14, 2010 through May 20, 2010, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by AVI HVIV GOZLAN, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments (check #553 and check #554 from Marilyn Passolt) of a value exceeding \$5000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft and theft from elder, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

Special Allegation 1

It is further alleged, pursuant to Penal Code 186.10(c)(1)(B), that the violation(s) charged in Count(s) 3,5,6,8,10,11,12,13,14, 15,16,17,18,21,25,26,27,28,29,30,31, and 32, arose from a common plan or scheme and the aggregate value of the transactions or attempted transactions is of a value exceeding one hundred and fifty thousand dollars (\$150,000) but is less than one million dollars (\$1,000,000).

COUNT 4

On or about May 09, 2010 through May 14, 2010, in the above named Judicial District, the crime of THEFT FROM ELDER OR DEPENDENT ADULT, in violation of Penal Code 368(d), a Felony, was committed by AVI HVIV GOZLAN, who committed theft and embezzlement with respect to the property of an elder and dependent adult, said property having a value exceeding \$400.00, and knew and reasonably should have known that said person, Darlene Roker, was an elder and dependent adult.

Special Allegation 1

It is further alleged, pursuant to Penal Code section 186.11(a)(1), that offenses set forth in counts 2,4,7,9,19,20,22,23, and 24 are related felonies, a material element of which is fraud, which involve a pattern of related felony conduct, and the pattern of related felony conduct involved the taking of more than One Hundred Thousand Dollars (\$100,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

Special Allegation 2

It is further alleged that in the commission of the above offense(s) the said defendant AVI HVIV GOZLAN, with the intent to do so, took, damaged and destroyed property of a value exceeding \$200,000, within the meaning of Penal Code Section 12022.6(a)(2).

COUNT 5

On or about June 01, 2010 through June 07, 2010, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by AVI HVIV GOZLAN, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments (check #255 from Darlene Roker) of a value exceeding \$5000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft and theft from elder, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

Special Allegation 1

It is further alleged, pursuant to Penal Code 186.10(c)(1)(B), that the violation(s) charged in Count(s) 3,5,6,8,10,11,12,13,14, 15,16,17,18,21,25,26,27,28,29,30,31, and 32, arose from a common plan or scheme and the aggregate value of the transactions or attempted transactions is of a value exceeding one hundred and fifty thousand dollars (\$150,000) but is less than one million dollars (\$1,000,000).

COUNT 6

On or about June 07, 2010 through June 11, 2010, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by AVI HVIV GOZLAN, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments (check #257 and Check #259 from Darlene Roker) of a value exceeding \$5000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft and theft from elder, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

Special Allegation 1

It is further alleged, pursuant to Penal Code 186.10(c)(1)(B), that the violation(s) charged in Count(s) 3,5,6,8,10,11,12,13,14, 15,16,17,18,21,25,26,27,28,29,30,31, and 32, arose from a common plan or scheme and the aggregate value of the transactions or attempted transactions is of a value exceeding one hundred and fifty thousand dollars (\$150,000) but is less than one million dollars (\$1,000,000).

COUNT 7

On or about July 12, 2010 through July 21, 2010, in the above named Judicial District, the crime of THEFT FROM ELDER OR DEPENDENT ADULT, in violation of Penal Code 368(d), a Felony, was committed by AVI HVIV GOZLAN, who committed theft and embezzlement with respect to the property of an elder and dependent adult, said property having a value exceeding \$400.00, and knew and reasonably should have known that said person, Winona Hill, was an elder and dependent adult.

Special Allegation 1

It is further alleged, pursuant to Penal Code section 186.11(a)(1), that offenses set forth in counts 2,4,7,9,19,20,22,23, and 24 are related felonies, a material element of which is fraud, which involve a pattern of related felony conduct, and the pattern of related felony conduct involved the taking of more than One Hundred Thousand Dollars (\$100,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

Special Allegation 2

It is further alleged that in the commission of the above offense(s) the said defendant AVI HVIV GOZLAN, with the intent to do so, took, damaged and destroyed property of a value exceeding \$200,000, within the meaning of Penal Code Section 12022.6(a)(2).

COUNT 8

On or about July 15, 2010 through July 21, 2010, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by AVI HVIV GOZLAN, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments (check #1421 and check #1414 from Winona Hill) of a value exceeding \$5000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft and theft from elder, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

Special Allegation 1

It is further alleged, pursuant to Penal Code 186.10(c)(1)(B), that the violation(s) charged in Count(s) 3,5,6,8,10,11,12,13,14, 15,16,17,18,21,25,26,27,28,29,30,31, and 32, arose from a common plan or scheme and the aggregate value of the transactions or attempted transactions is of a value exceeding one hundred and fifty thousand dollars (\$150,000) but is less than one million dollars (\$1,000,000).

COUNT 9

On or about October 25, 2010 through November 12, 2010, in the above named Judicial District, the crime of THEFT FROM ELDER OR DEPENDENT ADULT, in violation of Penal Code 368(d), a Felony, was committed by AVI HVIV GOZLAN, who committed theft and embezzlement with respect to the property of an elder and dependent adult, said property having a value exceeding \$400.00, and knew and reasonably should have known that said person, Helen Yunker, was an elder and dependent adult.

Special Allegation 1

It is further alleged, pursuant to Penal Code section 186.11(a)(1), that offenses set forth in counts 2,4,7,9,19,20,22,23, and 24 are related felonies, a material element of which is fraud, which involve a pattern of related felony conduct, and the pattern of related felony conduct involved the taking of more than One Hundred Thousand Dollars (\$100,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

Special Allegation 2

It is further alleged that in the commission of the above offense(s) the said defendant AVI HVIV GOZLAN, with the intent to do so, took, damaged and destroyed property of a value exceeding \$200,000, within the meaning of Penal Code Section 12022.6(a)(2).

COUNT 10

On or about October 27, 2010 through November 12, 2010, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by AVI HVIV GOZLAN, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments (check #1489 from Helen Yunker) of a value exceeding \$5000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft and theft from elder, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

Special Allegation 1

It is further alleged, pursuant to Penal Code 186.10(c)(1)(B), that the violation(s) charged in Count(s) 3,5,6,8,10,11,12,13,14, 15,16,17,18,21,25,26,27,28,29,30,31, and 32, arose from a common plan or scheme and the aggregate value of the transactions or attempted transactions is of a value exceeding one hundred and fifty thousand dollars (\$150,000) but is less than one million dollars (\$1,000,000).

COUNT 11

On or about October 29, 2010 through November 04, 2010, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by AVI HVIV GOZLAN, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments (check #1490 from Helen Yunker) of a value exceeding \$5000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft and theft from elder, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

Special Allegation 1

It is further alleged, pursuant to Penal Code 186.10(c)(1)(B), that the violation(s) charged in Count(s) 3,5,6,8,10,11,12,13,14, 15,16,17,18,21,25,26,27,28,29,30,31, and 32, arose from a common plan or scheme and the aggregate value of the transactions or attempted transactions is of a value exceeding one hundred and fifty thousand dollars (\$150,000) but is less than one million dollars (\$1,000,000).

COUNT 12

On or about November 01, 2010 through November 07, 2010, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by AVI HVIV GOZLAN, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments (check # 1497, check #1496, check # 1498 from Helen Yunker) of a value exceeding \$5000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft and theft from elder, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

Special Allegation 1

It is further alleged, pursuant to Penal Code 186.10(c)(1)(B), that the violation(s) charged in Count(s) 3,5,6,8,10,11,12,13,14, 15,16,17,18,21,25,26,27,28,29,30,31, and 32, arose from a common plan or scheme and the aggregate value of the transactions or attempted transactions is of a value exceeding one hundred and fifty thousand dollars (\$150,000) but is less than one million dollars (\$1,000,000).

COUNT 13

On or about November 05, 2010 through November 11, 2010, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by AVI HVIV GOZLAN, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments (check #1500 from Helen Yunker) of a value exceeding \$5000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft and theft from elder, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

Special Allegation 1

It is further alleged, pursuant to Penal Code 186.10(c)(1)(B), that the violation(s) charged in Count(s) 3,5,6,8,10,11,12,13,14, 15,16,17,18,21,25,26,27,28,29,30,31, and 32, arose from a common plan or scheme and the aggregate value of the transactions or attempted transactions is of a value exceeding one hundred and fifty thousand dollars (\$150,000) but is less than one million dollars (\$1,000,000).

COUNT 14

On or about November 08, 2010 through November 14, 2010, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by AVI HVIV GOZLAN, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments (check #1507 from Helen Yunker) of a value exceeding \$5000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft and theft from elder, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

Special Allegation 1

It is further alleged, pursuant to Penal Code 186.10(c)(1)(B), that the violation(s) charged in Count(s) 3,5,6,8,10,11,12,13,14, 15,16,17,18,21,25,26,27,28,29,30,31, and 32, arose from a common plan or scheme and the aggregate value of the transactions or attempted transactions is of a value exceeding one hundred and fifty thousand dollars (\$150,000) but is less than one million dollars (\$1,000,000).

COUNT 15

On or about November 08, 2010 through November 14, 2010, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by AVI HVIV GOZLAN, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments (check #1508 from Helen Yunker) of a value exceeding \$5000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft and theft from elder, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

Special Allegation 1

It is further alleged, pursuant to Penal Code 186.10(c)(1)(B), that the violation(s) charged in Count(s) 3,5,6,8,10,11,12,13,14, 15,16,17,18,21,25,26,27,28,29,30,31, and 32, arose from a common plan or scheme and the aggregate value of the transactions or attempted transactions is of a value exceeding one hundred and fifty thousand dollars (\$150,000) but is less than one million dollars (\$1,000,000).

COUNT 16

On or about November 09, 2010 through November 15, 2010, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by AVI HVIV GOZLAN, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments (check #1506 from Helen Yunker) of a value exceeding \$5000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft and theft from elder, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

Special Allegation 1

It is further alleged, pursuant to Penal Code 186.10(c)(1)(B), that the violation(s) charged in Count(s) 3,5,6,8,10,11,12,13,14, 15,16,17,18,21,25,26,27,28,29,30,31, and 32, arose from a common plan or scheme and the aggregate value of the transactions or attempted transactions is of a value exceeding one hundred and fifty thousand dollars (\$150,000) but is less than one million dollars (\$1,000,000).

COUNT 17

On or about November 12, 2010 through November 18, 2010, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by AVI HVIV GOZLAN, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments (check #1516 from Helen Yunker) of a value exceeding \$5000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft and theft from elder, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

Special Allegation 1

It is further alleged, pursuant to Penal Code 186.10(c)(1)(B), that the violation(s) charged in Count(s) 3,5,6,8,10,11,12,13,14, 15,16,17,18,21,25,26,27,28,29,30,31, and 32, arose from a common plan or scheme and the aggregate value of the transactions or attempted transactions is of a value exceeding one hundred and fifty thousand dollars (\$150,000) but is less than one million dollars (\$1,000,000).

COUNT 18

On or about November 12, 2010 through November 18, 2010, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by AVI HVIV GOZLAN, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments (check #1513 from Helen Yunker) of a value exceeding \$5000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft and theft from elder, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

Special Allegation 1

It is further alleged, pursuant to Penal Code 186.10(c)(1)(B), that the violation(s) charged in Count(s) 3,5,6,8,10,11,12,13,14, 15,16,17,18,21,25,26,27,28,29,30,31, and 32, arose from a common plan or scheme and the aggregate value of the transactions or attempted transactions is of a value exceeding one hundred and fifty thousand dollars (\$150,000) but is less than one million dollars (\$1,000,000).

COUNT 19

On or about November 25, 2010, in the above named Judicial District, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of Penal Code 487(a), a Felony, was committed by AVI HVIV GOZLAN, who did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit money the property of Lawrence Cardozo.

Special Allegation 1

It is further alleged, pursuant to Penal Code section 186.11(a)(1), that offenses set forth in counts 2,4,7,9,19,20,22,23, and 24 are related felonies, a material element of which is fraud, which involve a pattern of related felony conduct, and the pattern of related felony conduct involved the taking of more than One Hundred Thousand Dollars (\$100,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

Special Allegation 2

It is further alleged that in the commission of the above offense(s) the said defendant AVI HVIV GOZLAN, with the intent to do so, took, damaged and destroyed property of a value exceeding \$200,000, within the meaning of Penal Code Section 12022.6(a)(2).

COUNT 20

On or about January 16, 2012 through May 19, 2012, in the above named Judicial District, the crime of GRAND THEFT PERSONAL PROPERTY, in violation of Penal Code 487(a), a Felony, was committed by AVI HVIV GOZLAN and DORON SHAHAM, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit money the property of Diane VanDeth.

Special Allegation 1

It is further alleged, pursuant to Penal Code section 186.11(a)(1), that offenses set forth in counts 2,4,7,9,19,20,22,23, and 24 as to AVI HVIV GOZLAN are related felonies, a material element of which is fraud, which involve a pattern of related felony conduct, and the pattern of related felony conduct involved the taking of more than One Hundred Thousand Dollars (\$100,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

Special Allegation 2

It is further alleged that in the commission of the above offense(s) the said defendant AVI HVIV GOZLAN, with the intent to do so, took, damaged and destroyed property of a value exceeding \$200,000, within the meaning of Penal Code Section 12022.6(a)(2).

COUNT 21

On or about March 28, 2012 through March 30, 2012, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by AVI HVIV GOZLAN and DORON SHAHAM, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments (check #1919 from Diane Van Deth) of a value exceeding \$5000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft and theft from elder, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

Special Allegation 1

It is further alleged, pursuant to Penal Code 186.10(c)(1)(B), that the violation(s) charged in Count(s) 3,5,6,8,10,11,12,13,14, 15,16,17,18,21,25,26,27,28,29,30,31, and 32 as to AVI HVIV GOZLAN, arose from a common plan or scheme and the aggregate value of the transactions or attempted transactions is of a value exceeding one hundred and fifty thousand dollars (\$150,000) but is less than one million dollars (\$1,000,000).

COUNT 22

On or about May 01, 2012 through June 30, 2012, in the above named Judicial District, the crime of GRAND THEFT, in violation of Penal Code 487(a), a Felony, was committed by AVI HVIV GOZLAN, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit money the property of Tim Urton.

Special Allegation 1

It is further alleged, pursuant to Penal Code section 186.11(a)(1), that offenses set forth in counts 2,4,7,9,19,20,22,23, and 24 are related felonies, a material element of which is fraud, which involve a pattern of related felony conduct, and the pattern of related felony conduct involved the taking of more than One Hundred Thousand Dollars (\$100,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

Special Allegation 2

It is further alleged that in the commission of the above offense(s) the said defendant AVI HVIV GOZLAN, with the intent to do so, took, damaged and destroyed property of a value exceeding \$200,000, within the meaning of Penal Code Section 12022.6(a)(2).

COUNT 23

On or about July 07, 2012 through August 10, 2012, in the above named Judicial District, the crime of THEFT FROM ELDER OR DEPENDENT ADULT, in violation of Penal Code 368(d), a Felony, was committed by AVI HVIV GOZLAN, who committed theft and embezzlement with respect to the property of an elder and dependent adult, said property having a value exceeding \$950.00, and knew and reasonably should have known that said person, Carl Brown, was an elder and dependent adult.

Special Allegation 1

It is further alleged, pursuant to Penal Code section 186.11(a)(1), that offenses set forth in counts 2,4,7,9,19,20,22,23, and 24 are related felonies, a material element of which is fraud, which involve a pattern of related felony conduct, and the pattern of related felony conduct involved the taking of more than One Hundred Thousand Dollars (\$100,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

Special Allegation 2

It is further alleged that in the commission of the above offense(s) the said defendant AVI HVIV GOZLAN, with the intent to do so, took, damaged and destroyed property of a value exceeding \$200,000, within the meaning of Penal Code Section 12022.6(a)(2).

COUNT 24

On or about July 09, 2012 through July 23, 2012, in the above named Judicial District, the crime of THEFT FROM ELDER OR DEPENDENT ADULT, in violation of Penal Code 368(d), a Felony, was committed by AVI HVIV GOZLAN, who committed theft and embezzlement with respect to the property of an elder and dependent adult, said property having a value exceeding \$950.00, and knew and reasonably should have known that said person, Jeanne Grant, was an elder and dependent adult.

Special Allegation 1

It is further alleged, pursuant to Penal Code section 186.11(a)(1), that offenses set forth in counts 2,4,7,9,19,20,22,23, and 24 are related felonies, a material element of which is fraud, which involve a pattern of related felony conduct, and the pattern of related felony conduct involved the taking of more than One Hundred Thousand Dollars (\$100,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

Special Allegation 2

It is further alleged that in the commission of the above offense(s) the said defendant AVI HVIV GOZLAN, with the intent to do so, took, damaged and destroyed property of a value exceeding \$200,000, within the meaning of Penal Code Section 12022.6(a)(2).

COUNT 25

On or about March 28, 2012 through March 30, 2012, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by AVI HVIV GOZLAN, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments (check #4224 from Jeanne Grant) of a value exceeding money through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft and theft from elder, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

Special Allegation 1

It is further alleged, pursuant to Penal Code 186.10(c)(1)(B), that the violation(s) charged in Count(s) 3,5,6,8,10,11,12,13,14, 15,16,17,18,21,25,26,27,28,29,30,31, and 32, arose from a common plan or scheme and the aggregate value of the transactions or attempted transactions is of a value exceeding one hundred and fifty thousand dollars (\$150,000) but is less than one million dollars (\$1,000,000).

COUNT 26

On or about November 16, 2011 through November 17, 2011, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by AVI HVIV GOZLAN, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments (check #1095 from Amco Inc. in the amount of \$20,500) of a value exceeding \$5000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft and theft from elder, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

Special Allegation 1

It is further alleged, pursuant to Penal Code 186.10(c)(1)(B), that the violation(s) charged in Count(s) 3,5,6,8,10,11,12,13,14, 15,16,17,18,21,25,26,27,28,29,30,31, and 32, arose from a common plan or scheme and the aggregate value of the transactions or attempted transactions is of a value exceeding one hundred and fifty thousand dollars (\$150,000) but is less than one million dollars (\$1,000,000).

COUNT 27

On or about December 05, 2011, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by AVI HVIV GOZLAN, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments (\$79,950 of checks from VIP, Universal, Vista and Liberty into Amco) of a value exceeding \$5000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft and theft from elder, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

Special Allegation 1

It is further alleged, pursuant to Penal Code 186.10(c)(1)(B), that the violation(s) charged in Count(s) 3,5,6,8,10,11,12,13,14, 15,16,17,18,21,25,26,27,28,29,30,31, and 32, arose from a common plan or scheme and the aggregate value of the transactions or attempted transactions is of a value exceeding one hundred and fifty thousand dollars (\$150,000) but is less than one million dollars (\$1,000,000).

COUNT 28

On or about December 06, 2011, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by AVI HVIV GOZLAN, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments (\$60,000 deposited into Amco comprised of a check from Liberty Construction) of a value exceeding \$5000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft and theft from elder, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

Special Allegation 1

It is further alleged, pursuant to Penal Code 186.10(c)(1)(B), that the violation(s) charged in Count(s) 3,5,6,8,10,11,12,13,14, 15,16,17,18,21,25,26,27,28,29,30,31, and 32, arose from a common plan or scheme and the aggregate value of the transactions or attempted transactions is of a value exceeding one hundred and fifty thousand dollars (\$150,000) but is less than one million dollars (\$1,000,000).

COUNT 29

On or about December 07, 2011, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by AVI HVIV GOZLAN, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments (\$7,500 in checks, one check from Vista Home Improvements in the amount of \$4,500 and one check from Universal Remodeling in the amount of \$3,000), of a value exceeding \$5000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft and theft from elder, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

Special Allegation 1

It is further alleged, pursuant to Penal Code 186.10(c)(1)(B), that the violation(s) charged in Count(s) 3,5,6,8,10,11,12,13,14, 15,16,17,18,21,25,26,27,28,29,30,31, and 32, arose from a common plan or scheme and the aggregate value of the transactions or attempted transactions is of a value exceeding one hundred and fifty thousand dollars (\$150,000) but is less than one million dollars (\$1,000,000).

COUNT 30

On or about December 07, 2011, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by AVI HVIV GOZLAN, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments (wire transfer from Amco, Inc. to United Trust Bank of Atlanta in the amount of \$182,100) of a value exceeding \$5000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft and theft from elder, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

Special Allegation 1

It is further alleged, pursuant to Penal Code 186.10(c)(1)(B), that the violation(s) charged in Count(s) 3,5,6,8,10,11,12,13,14, 15,16,17,18,21,25,26,27,28,29,30,31, and 32, arose from a common plan or scheme and the aggregate value of the transactions or attempted transactions is of a value exceeding one hundred and fifty thousand dollars (\$150,000) but is less than one million dollars (\$1,000,000).

COUNT 31

On or about February 21, 2012 through February 25, 2012, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by AVI HVIV GOZLAN, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments (check #1117 from Amco Inc. in the amount of \$6,923.02 made payable to Triumph Instruments - Burbank Van Nuys Hangar Facility with the note invoice #V51138) of a value exceeding \$5000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft and theft from elder, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

Special Allegation 1

It is further alleged, pursuant to Penal Code 186.10(c)(1)(B), that the violation(s) charged in Count(s) 3,5,6,8,10,11,12,13,14, 15,16,17,18,21,25,26,27,28,29,30,31, and 32, arose from a common plan or scheme and the aggregate value of the transactions or attempted transactions is of a value exceeding one hundred and fifty thousand dollars (\$150,000) but is less than one million dollars (\$1,000,000).

COUNT 32

On or about May 17, 2012, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by AVI HVIV GOZLAN, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments (check #1138 from Amco Inc. in the amount of \$6,167.99 made payable to Mather Aviation LLC with note Invoice #800862) of a value exceeding \$5000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft and theft from elder, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

Special Allegation 1


It is further alleged, pursuant to Penal Code 186.10(c)(1)(B), that the violation(s) charged in Count(s) 3,5,6,8,10,11,12,13,14, 15,16,17,18,21,25,26,27,28,29,30,31, and 32, arose from a common plan or scheme and the aggregate value of the transactions or attempted transactions is of a value exceeding one hundred and fifty thousand dollars (\$150,000) but is less than one million dollars (\$1,000,000).

COUNT 33

On or about October 18, 2012, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by INBAL GINDEL BENDOV, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments (Bank of America cashier's check #913337 in the amount of \$45,000 from Horizon Home Design made payable to General Remodeling) of a value exceeding \$5000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft and theft from elder, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

A TRUE BILL.

DATED: 7/19/13


DON FERNANDEZ
GRAND JURY FOREPERSON
CRIMINAL GRAND JURY

Witness List

1. Jenece Hards, Contractors State License Board;
2. Ralph Martinez; Ventura County District Attorney
3. Henry Morris Jacobs, Monrovia, CA;
4. Donald Briggs, Chino, CA;
5. Stephen Ritz, Yorba Linda, CA;
6. Ely Kavon, Tarzana, CA;
7. Arnold Surnow, Oxnard, CA;
8. Lawrence Cardozo, Ventura, CA;
9. Helen Yunker, Ventura, CA;
10. Kevin Quinn, Ventura, CA;
11. Ran Scop, Tarzana, CA;
12. Brooke Valiente, Lancaster, CA;
13. Marilyn Passolt, Thousand Oaks, CA;
14. Darlene Roker, Ventura, CA;
15. Frank Huber, Ventura County District Attorney;
16. Winona Hill, Oxnard, CA;
17. Jeanne Grant, Thousand Oaks, CA;
18. Carl Brown, Ventura, CA;
19. Tim Urton, Camarillo, CA;
20. Randy Traweek, Los Angeles, CA;
21. David Spiegel, Upland, CA;
22. James Palm, Van Nuys, CA;
23. Joseph Giram, Los Angeles, CA;
24. Elissa Perry, Woodland Hills, CA;
25. Debra Hoyte, Los Angeles, CA;
26. Debra Mabrie, Canyon County, CA;
27. Arthur Jauregui, Northridge, CA;
28. Adam Wittkins, Ventura County District Attorney;

29. Blanca Farias, Sun Valley, CA;
30. Molly Afragan, Woodland Hills, CA;
31. Inbal Ben Dov, Sherman Oaks, CA;
32. Catherine Mano, Ventura County District Attorney;
33. Simon Cohen, Tarzana, CA;
34. Cole Gibson, Ventura County District Attorney;
35. Diane Vandeth, Huntington Beach, CA;
36. Brent Gong, Woodland Hills, CA;
37. Jeff Barry, Ventura County District Attorney.