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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

BROOKE VALIENTE (11-18-1985)
ABNER SONNENBERG (11-02-1974)
YANIV BENDOV (11-03-1970)
SHAHAR JOHNNY CYWIAK (12-25-1979)
RAMI RAY SHILOMI (02-14-1978)
ROSANNA MARIA BONGIORNO (03-14-1977)
SIMON COHEN (07-19-1968)

Defendant(s).

VCIJIS Case: 2013022515

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 BROOKE VALIENTE and ABNER SONNENBERG and YANIV BENDOV and SHAHAR JOHNNY CYWIAK and RAMI RAY SHILOMI and ROSANNA MARIA BONGIORNO and SIMON COHEN, who did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of conspiracy to contract without a license, in violation of Section 7028 of the Business and Professions Code, a felony; that pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, the said defendant(s)s committed 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 contract 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 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 YANIV BENDOV, 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.

COUNT 3

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 RAMI RAY SHILOMI, 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.

COUNT 4

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 ROSANNA MARIA BONGIORNO, 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.

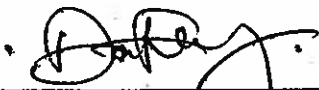
COUNT 5

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 SIMON COHEN, 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: _____

07/18/13



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.