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9
10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF LOS ANGELES

12
13 **PEOPLE OF THE STATE OF CALIFORNIA,**

14 Plaintiff,

15 v.

16 **GARY ARNOLD EISENBERG** (DOB: 5/31/1938);
17 **BAREL ISKIN** (DOB: 5/18/1987); **NIV ISKIN** (DOB:
4/14/1980); **IRA ITSKOWITZ** (DOB: 2/12/1952);
18 **REVIV KARPMAN** (DOB: 9/7/1971); **TOMER**
KOGMAN (6/18/1979); **GREGG SCOTT QUINN**
(8/19/1972); **JUAN PIERRE WASHINGTON** (DOB:
19 9/26/1969); **AVRAHAM YECHIZKIA** (DOB:
3/6/1976).

20 Defendants.

Case No.

FELONY COMPLAINT

21
22 The ATTORNEY GENERAL OF THE STATE OF CALIFORNIA accuses defendants
23 **GARY ARNOLD EISENBERG, BAREL ISKIN, NIV ISKIN, IRA ITSKOWITZ, REVIV**
24 **KARPMAN, TOMER KOGMAN, GREGG SCOTT QUINN, JUAN PIERRE**
WASHINGTON, and AVRAHAM YECHIZKIA of the following crimes, which are connected
to one another in their commission:

25 **COUNT 1 - GRAND THEFT**

26 On or about March 1, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, and GREGG SCOTT
27 **QUINN**, unlawfully took property, to wit: money for mortgage loan modification services, of a
value in excess of four hundred dollars (\$400) from another, to wit: [REDACTED], in violation
28 of Penal Code section 487, subdivision (a), a felony.

1 **COUNT 2 - GRAND THEFT**

2 On or about March 13, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
3 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, and GREGG SCOTT**
4 **QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan modification
services, of a value in excess of four hundred dollars (\$400) from another, to wit: [REDACTED],
in violation of Penal Code section 487, subdivision (a), a felony.

5 **COUNT 3 - GRAND THEFT**

6 On or about March 19, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
7 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, and GREGG SCOTT**
8 **QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan modification
services, of a value in excess of four hundred dollars (\$400) from another, to wit: [REDACTED], in
violation of Penal Code section 487, subdivision (a), a felony.

9 **COUNT 4 - GRAND THEFT**

10 On or about March 20, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
11 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, and GREGG SCOTT**
12 **QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan modification
services, of a value in excess of four hundred dollars (\$400) from another, to wit: [REDACTED]
[REDACTED] in violation of Penal Code section 487, subdivision (a), a felony.

13 **COUNT 5 - GRAND THEFT**

14 On or about April 10, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
15 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, and GREGG SCOTT**
16 **QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan modification
services, of a value in excess of four hundred dollars (\$400) from another, to wit: [REDACTED]
[REDACTED], in violation of Penal Code section 487, subdivision (a), a felony.

17 **COUNT 6 - GRAND THEFT**

18 On or about April 22, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
19 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, and GREGG SCOTT**
20 **QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan modification
services, of a value in excess of four hundred dollars (\$400) from another, to wit: [REDACTED]
[REDACTED], in violation of Penal Code section 487, subdivision (a), a felony.

21 **COUNT 7 - GRAND THEFT**

22 On or about April 23, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
23 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, and GREGG SCOTT**
24 **QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan modification
services, of a value in excess of four hundred dollars (\$400) from another, to wit: [REDACTED]
[REDACTED] in violation of Penal Code section 487, subdivision (a), a felony.

25 **COUNT 8 - GRAND THEFT**

26 On or about April 28, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
27 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, and GREGG SCOTT**
28 **QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan modification
services, of a value in excess of four hundred dollars (\$400) from another, to wit: [REDACTED]
in violation of Penal Code section 487, subdivision (a), a felony.

COUNT 9 - GRAND THEFT

On or about May 13, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, and GREGG SCOTT
QUINN, unlawfully took property, to wit: money for fictitious mortgage loan modification
services, of a value in excess of four hundred dollars (\$400) from another, to wit: Dan and
[REDACTED] in violation of Penal Code section 487, subdivision (a), a felony.

1 **COUNT 10 - GRAND THEFT**

2 On or about May 14, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
3 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, and GREGG SCOTT**
4 **QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan modification
services, of a value in excess of four hundred dollars (\$400) from another, to wit: [REDACTED],
in violation of Penal Code section 487, subdivision (a), a felony.

5 **COUNT 11 - GRAND THEFT**

6 On or about May 19, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
7 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, and GREGG SCOTT**
8 **QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan modification
services, of a value in excess of four hundred dollars (\$400) from another, to wit: [REDACTED]
[REDACTED] in violation of Penal Code section 487, subdivision (a), a felony.

9 **COUNT 12 - GRAND THEFT**

10 On or about May 21, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
11 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, and GREGG SCOTT**
12 **QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan modification
services, of a value in excess of four hundred dollars (\$400) from another, to wit [REDACTED],
in violation of Penal Code section 487, subdivision (a), a felony.

13 **COUNT 13 - GRAND THEFT**

14 On or about May 22, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
15 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, and GREGG SCOTT**
16 **QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan modification
services, of a value in excess of four hundred dollars (\$400) from another, to wit: [REDACTED]
[REDACTED] in violation of Penal Code section 487, subdivision (a), a felony.

17 **COUNT 14 - GRAND THEFT**

18 On or about June 2, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
19 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, and GREGG SCOTT**
20 **QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan modification
services, of a value in excess of four hundred dollars (\$400) from another, to wit: [REDACTED]
[REDACTED], in violation of Penal Code section 487, subdivision (a), a felony.

21 **COUNT 15 - GRAND THEFT**

22 On or about June 5, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
23 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, and GREGG SCOTT**
24 **QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan modification
services, of a value in excess of four hundred dollars (\$400) from another, to wit: [REDACTED],
in violation of Penal Code section 487, subdivision (a), a felony.

25 **COUNT 16 - GRAND THEFT**

26 On or about June 12, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
27 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, and GREGG SCOTT**
28 **QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan modification
services, of a value in excess of four hundred dollars (\$400) from another, to wit: [REDACTED],
in violation of Penal Code section 487, subdivision (a), a felony.

COUNT 17 - GRAND THEFT

On or about June 30, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, and GREGG SCOTT
QUINN, unlawfully took property, to wit: money for fictitious mortgage loan modification
services, of a value in excess of four hundred dollars (\$400) from another, to wit: [REDACTED]
[REDACTED], in violation of Penal Code section 487, subdivision (a), a felony.

1 **COUNT 18 - GRAND THEFT**

2 On or about July 1, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
3 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, GARY ARNOLD**
4 **EISENBERG , IRA ITSKOWITZ, and GREGG SCOTT QUINN**, unlawfully took property,
to wit: money for fictitious mortgage loan modification services, of a value in excess of four
hundred dollars (\$400) from another, to wit: [REDACTED] in violation of Penal Code section
487, subdivision (a), a felony.

5 **COUNT 19 - GRAND THEFT**

6 On or about July 8, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
7 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, IRA ITSKOWITZ, and**
8 **GREGG SCOTT QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan
modification services, of a value in excess of four hundred dollars (\$400) from another, to wit:
[REDACTED] in violation of Penal Code section 487, subdivision (a), a felony.

9 **COUNT 20 - GRAND THEFT**

10 On or about July 9, 2008, in the County of Los Angeles, defendants, **NIV ISKIN, REVIV**
11 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, GARY ARNOLD**
12 **EISENBERG , IRA ITSKOWITZ, and GREGG SCOTT QUINN**, unlawfully took property,
to wit: money for fictitious mortgage loan modification services, of a value in excess of four
hundred dollars (\$400) from another, to wit: [REDACTED], in violation of Penal Code
section 487, subdivision (a), a felony.

13 **COUNT 21 - GRAND THEFT**

14 On or about July 11, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
15 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, IRA ITSKOWITZ, and**
16 **GREGG SCOTT QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan
modification services, of a value in excess of four hundred dollars (\$400) from another, to wit:
[REDACTED], in violation of Penal Code section 487, subdivision (a), a felony.

17 **COUNT 22 - GRAND THEFT**

18 On or about July 14, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
19 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, IRA ITSKOWITZ, and**
20 **GREGG SCOTT QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan
modification services, of a value in excess of four hundred dollars (\$400) from another, to wit:
[REDACTED], in violation of Penal Code section 487, subdivision (a), a felony.

21 **COUNT 23 - GRAND THEFT**

22 On or about July 18, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
23 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, IRA ITSKOWITZ, and**
24 **GREGG SCOTT QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan
modification services, of a value in excess of four hundred dollars (\$400) from another, to wit:
[REDACTED] in violation of Penal Code section 487, subdivision (a), a felony.

25 **COUNT 24 - GRAND THEFT**

26 On or about July 23, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
27 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, GARY ARNOLD**
28 **EISENBERG , IRA ITSKOWITZ, and GREGG SCOTT QUINN**, unlawfully took property,
to wit: money for fictitious mortgage loan modification services, of a value in excess of four
hundred dollars (\$400) from another, to wit: [REDACTED], in violation of Penal Code section
487, subdivision (a), a felony.

COUNT 25 - GRAND THEFT

On or about July 25, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, IRA ITSKOWITZ, and

1 **GREGG SCOTT QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan
2 modification services, of a value in excess of four hundred dollars (\$400) from another, to wit:
3 [REDACTED] in violation of Penal Code section 487, subdivision (a), a felony.

3 **COUNT 26 - GRAND THEFT**

4 On or about July 30, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
5 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, IRA ITSKOWITZ, and**
6 **GREGG SCOTT QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan
7 modification services, of a value in excess of four hundred dollars (\$400) from another, to wit:
8 [REDACTED] in violation of Penal Code section 487, subdivision (a), a felony.

6 **COUNT 27 - GRAND THEFT**

7 On or about August 12, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
8 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, IRA ITSKOWITZ, and**
9 **GREGG SCOTT QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan
10 modification services, of a value in excess of four hundred dollars (\$400) from another, to wit:
11 [REDACTED], in violation of Penal Code section 487, subdivision (a), a felony.

10 **COUNT 28 - GRAND THEFT**

11 On or about August 18, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
12 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, GREGG SCOTT QUINN**
13 **and GARY ARNOLD EISENBERG**, unlawfully took property, to wit: money for fictitious
14 mortgage loan modification services, of a value in excess of four hundred dollars (\$400) from
15 another, to wit: [REDACTED], in violation of Penal Code section 487, subdivision (a), a
16 felony.

14 **COUNT 29 - GRAND THEFT**

15 On or about August 20, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
16 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, IRA ITSKOWITZ, and**
17 **GREGG SCOTT QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan
18 modification services, of a value in excess of four hundred dollars (\$400) from another, to wit:
19 [REDACTED], in violation of Penal Code section 487, subdivision (a), a felony.

17 **COUNT 30 - GRAND THEFT**

18 On or about August 20, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
19 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, IRA ITSKOWITZ, and**
20 **GREGG SCOTT QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan
21 modification services, of a value in excess of four hundred dollars (\$400) from another, to wit:
22 [REDACTED] in violation of Penal Code section 487, subdivision (a), a felony.

21 **COUNT 31 - GRAND THEFT**

22 On or about August 23, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
23 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, IRA ITSKOWITZ, and**
24 **GREGG SCOTT QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan
25 modification services, of a value in excess of four hundred dollars (\$400) from another, to wit:
26 [REDACTED], in violation of Penal Code section 487, subdivision (a), a felony.

24 **COUNT 32 - GRAND THEFT**

25 On or about August 25, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
26 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, IRA ITSKOWITZ, and**
27 **GREGG SCOTT QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan
28 modification services, of a value in excess of four hundred dollars (\$400) from another, to wit:
[REDACTED], in violation of Penal Code section 487, subdivision (a), a felony.

1 **COUNT 33 - GRAND THEFT**

2 On or about August 26, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
3 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, IRA ITSKOWITZ, and**
4 **GREGG SCOTT QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan
modification services, of a value in excess of four hundred dollars (\$400) from another, to wit:
██████████, in violation of Penal Code section 487, subdivision (a), a felony.

5 **COUNT 34 - GRAND THEFT**

6 On or about September 2, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
7 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, IRA ITSKOWITZ, and**
8 **GREGG SCOTT QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan
modification services, of a value in excess of four hundred dollars (\$400) from another, to wit:
██████████ in violation of Penal Code section 487, subdivision (a), a
felony.

9 **COUNT 35 - GRAND THEFT**

10 On or about September 17, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
11 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, IRA ITSKOWITZ, and**
12 **GREGG SCOTT QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan
modification services, of a value in excess of four hundred dollars (\$400) from another, to wit:
██████████, in violation of Penal Code section 487, subdivision (a), a felony.

13 **COUNT 36 - GRAND THEFT**

14 On or about September 24, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
15 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, IRA ITSKOWITZ, and**
16 **GREGG SCOTT QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan
modification services, of a value in excess of four hundred dollars (\$400) from another, to wit:
██████████, in violation of Penal Code section 487, subdivision (a), a felony.

17 **COUNT 37 - GRAND THEFT**

18 On or about September 24, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
19 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, BARELI SKIN and JUAN**
20 **PIERRE WASHINGTON**, unlawfully took property, to wit: money for fictitious mortgage loan
modification services, of a value in excess of four hundred dollars (\$400) from another, to wit:
██████████, in violation of Penal Code section 487, subdivision (a), a felony.

21 **COUNT 38 - GRAND THEFT**

22 On or about October 8, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
23 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, GARY ARNOLD**
24 **EISENBERG , IRA ITSKOWITZ, and GREGG SCOTT QUINN**, unlawfully took property,
25 to wit: money for fictitious mortgage loan modification services, of a value in excess of four
hundred dollars (\$400) from another, to wit: ██████████, in violation of Penal Code section
487, subdivision (a), a felony.

26 **COUNT 39 - GRAND THEFT**

27 On or about October 10, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
28 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, IRA ITSKOWITZ, and**
GREGG SCOTT QUINN, unlawfully took property, to wit: money for fictitious mortgage loan
modification services, of a value in excess of four hundred dollars (\$400) from another, to wit:
██████████ in violation of Penal Code section 487, subdivision (a), a felony.

COUNT 40 - GRAND THEFT

On or about October 17, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, IRA ITSKOWITZ, and
GREGG SCOTT QUINN, unlawfully took property, to wit: money for fictitious mortgage loan

1 modification services, of a value in excess of four hundred dollars (\$400) from another, to wit:
2 [REDACTED], in violation of Penal Code section 487, subdivision (a), a felony.

3 **COUNT 41 - GRAND THEFT**

4 On or about October 23, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
5 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, IRA ITSKOWITZ, and**
6 **GREGG SCOTT QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan
7 modification services, of a value in excess of four hundred dollars (\$400) from another, to wit:
8 [REDACTED] in violation of Penal Code section 487, subdivision (a), a felony.

9 **COUNT 42 - GRAND THEFT**

10 On or about October 27, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
11 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, GARY ARNOLD**
12 **EISENBERG, IRA ITSKOWITZ, and GREGG SCOTT QUINN**, unlawfully took property,
13 to wit: money for fictitious mortgage loan modification services, of a value in excess of four
14 hundred dollars (\$400) from another, to wit: [REDACTED], in violation of
15 Penal Code section 487, subdivision (a), a felony.

16 **COUNT 43 - GRAND THEFT**

17 On or about October 29, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
18 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, IRA ITSKOWITZ, and**
19 **GREGG SCOTT QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan
20 modification services, of a value in excess of four hundred dollars (\$400) from another, to wit:
21 [REDACTED], in violation of Penal Code section 487, subdivision (a), a felony.

22 **COUNT 44 - GRAND THEFT**

23 On or about November 11, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
24 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, IRA ITSKOWITZ, and**
25 **GREGG SCOTT QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan
26 modification services, of a value in excess of four hundred dollars (\$400) from another, to wit:
27 [REDACTED], in violation of Penal Code section 487, subdivision (a), a felony.

28 **COUNT 45 - GRAND THEFT**

On or about November 18, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, GARY ARNOLD
EISENBERG, IRA ITSKOWITZ, and GREGG SCOTT QUINN, unlawfully took property,
to wit: money for fictitious mortgage loan modification services, of a value in excess of four
hundred dollars (\$400) from another, to wit: [REDACTED] in violation of Penal Code section 487,
subdivision (a), a felony.

COUNT 46 - GRAND THEFT

On or about December 3, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, IRA ITSKOWITZ, and
GREGG SCOTT QUINN, unlawfully took property, to wit: money for fictitious mortgage loan
modification services, of a value in excess of four hundred dollars (\$400) from another, to wit:
[REDACTED], in violation of Penal Code section 487, subdivision (a), a felony.

COUNT 47 - GRAND THEFT

On or about December 5, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, BARELI SKIN and JUAN
PIERRE WASHINGTON, unlawfully took property, to wit: money for fictitious mortgage loan
modification services, of a value in excess of four hundred dollars (\$400) from another, to wit:
[REDACTED], in violation of Penal Code section 487, subdivision (a), a felony.

1 **COUNT 48 - GRAND THEFT**

2 On or about December 5, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
3 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, IRA ITSKOWITZ, and**
4 **GREGG SCOTT QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan
modification services, of a value in excess of four hundred dollars (\$400) from another, to wit:
[REDACTED] in violation of Penal Code section 487, subdivision (a), a felony.

5 **COUNT 49 - GRAND THEFT**

6 On or about December 9, 2008, in the County of Los Angeles, defendants, **NIV ISKIN, REVIV**
7 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, IRA ITSKOWITZ, and**
8 **GREGG SCOTT QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan
modification services, of a value in excess of four hundred dollars (\$400) from another, to wit:
[REDACTED], in violation of Penal Code section 487, subdivision (a), a felony.

9 **COUNT 50 - GRAND THEFT**

10 On or about December 10, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
11 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, GARY ARNOLD**
12 **EISENBERG , IRA ITSKOWITZ, and GREGG SCOTT QUINN**, unlawfully took property,
13 to wit: money for fictitious mortgage loan modification services, of a value in excess of four
14 hundred dollars (\$400) from another, to wit: [REDACTED] in violation of Penal Code section
15 487, subdivision (a), a felony.

16 **COUNT 51 - GRAND THEFT**

17 On or about December 15, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
18 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, IRA ITSKOWITZ, and**
19 **GREGG SCOTT QUINN**, unlawfully took property, to wit: money for fictitious mortgage loan
modification services, of a value in excess of four hundred dollars (\$400) from another, to wit:
[REDACTED], in violation of Penal Code section 487, subdivision (a), a felony.

20 **COUNT 52 - GRAND THEFT**

21 On or about December 15, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
22 **KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, GARY ARNOLD**
23 **EISENBERG , IRA ITSKOWITZ, and GREGG SCOTT QUINN**, unlawfully took property,
24 to wit: money for fictitious mortgage loan modification services, of a value in excess of four
25 hundred dollars (\$400) from another, to wit: [REDACTED], in violation of
26 Penal Code section 487, subdivision (a), a felony.

27 **COUNT 53 - GRAND THEFT**

28 On or about December 30, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, GARY ARNOLD
EISENBERG , IRA ITSKOWITZ, and GREGG SCOTT QUINN, unlawfully took property,
to wit: money for fictitious mortgage loan modification services, of a value in excess of four
hundred dollars (\$400) from another, to wit: [REDACTED], in violation of Penal
Code section 487, subdivision (a), a felony.

COUNT 54 - GRAND THEFT

On or about January 15, 2009, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, GARY ARNOLD
EISENBERG, and IRA ITSKOWITZ, unlawfully took property, to wit: money for fictitious
mortgage loan modification services, of a value in excess of four hundred dollars (\$400) from
another, to wit: [REDACTED] in violation of Penal Code section 487, subdivision (a), a felony.

COUNT 55 - GRAND THEFT

On or about January 27, 2009, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
KARPMAN, TOMER KOGMAN, AVRAHAM YECHIZKIA, and IRA ITSKOPWITZ,

1 unlawfully took property, to wit: money for fictitious mortgage loan modification services, of a
2 value in excess of four hundred dollars (\$400) from another, to wit: [REDACTED] in violation of
Penal Code section 487, subdivision (a), a felony.

3 **COUNT 56 - GRAND THEFT**

4 On or about March 9, 2009, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
5 **KARPMAN, TOMER KOGMAN, and AVRAHAM YECHIZKIA**, unlawfully took property,
6 to wit: money for fictitious mortgage loan modification services, of a value in excess of four
hundred dollars (\$400) from another, to wit: [REDACTED], in violation of Penal Code
section 487, subdivision (a), a felony.

6 **COUNT 57 - GRAND THEFT**

7 On or about May 5, 2009, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
8 **KARPMAN, TOMER KOGMAN, and AVRAHAM YECHIZKIA**, unlawfully took property,
9 to wit: money for fictitious mortgage loan modification services, of a value in excess of four
hundred dollars (\$400) from another, to wit: [REDACTED], in violation of Penal Code section
487, subdivision (a), a felony.

10 **COUNT 58 - GRAND THEFT**

11 Beginning on or about April 1, 2008, and continuing to on or about December 31, 2008, in the
12 County of Los Angeles, defendants **NIV ISKIN, REVIV KARPMAN, TOMER KOGMAN,**
13 **AVRAHAM YECHIZKIA and BAREL ISKIN**, unlawfully took property, to wit: money for
fictitious mortgage loan modification services, of a value in excess of four hundred dollars (\$400)
from another, to wit: homeowners referred by affiliate [REDACTED], in violation of Penal
Code section 487, subdivision (a), a felony.

14 **COUNT 59 - GRAND THEFT**

15 Beginning on or about May 1, 2008, and continuing to on or about August 31, 2008, in the
16 County of Los Angeles, defendants **NIV ISKIN, REVIV KARPMAN, TOMER KOGMAN,**
17 **AVRAHAM YECHIZKIA, BAREL ISKIN, and GREGG SCOTT QUINN**, unlawfully took
property, to wit: money for fictitious mortgage loan modification services, of a value in excess of
four hundred dollars (\$400) from another, to wit: homeowners referred by affiliate [REDACTED]
[REDACTED] in violation of Penal Code section 487, subdivision (a), a felony.

18 **COUNT 60 - GRAND THEFT**

19 Beginning on or about September 1, 2008, and continuing to on or about December 31, 2008, in
20 the County of Los Angeles, defendants **NIV ISKIN, REVIV KARPMAN, TOMER**
21 **KOGMAN, AVRAHAM YECHIZKIA, BARELI SKIN and JUAN PIERRE**
22 **WASHINGTON**, unlawfully took property, to wit: money for fictitious mortgage loan
modification services, of a value in excess of four hundred dollars (\$400) from another, to wit:
homeowners referred by affiliate [REDACTED], in violation of Penal Code section 487,
subdivision (a), a felony.

23 **COUNT 61 - GRAND THEFT**

24 Beginning on or about October 1, 2008, and continuing to on or about February 28, 2009, in the
25 County of Los Angeles, defendants **NIV ISKIN, REVIV KARPMAN, TOMER KOGMAN,**
26 **AVRAHAM YECHIZKIA, BAREL ISKIN and JUAN PIERRE WASHINGTON**,
unlawfully took property, to wit: money for fictitious mortgage loan modification services, of a
value in excess of four hundred dollars (\$400) from another, to wit: homeowners referred by
affiliate Steve Southwood, in violation of Penal Code section 487, subdivision (a), a felony.

27 **COUNT 62 - GRAND THEFT**

28 Beginning on or about October 1, 2008, and continuing to on or about November 30, 2008, in the
County of Los Angeles, defendants **NIV ISKIN, REVIV KARPMAN, TOMER KOGMAN,**
AVRAHAM YECHIZKIA, BAREL ISKIN and JUAN PIERRE WASHINGTON,

1 unlawfully took property, to wit: money for fictitious mortgage loan modification services, of a
2 value in excess of four hundred dollars (\$400) from another, to wit: homeowners referred by
affiliate [REDACTED], in violation of Penal Code section 487, subdivision (a), a felony.

3 **COUNT 63 - GRAND THEFT**

4 Beginning on or about December 1, 2008, and continuing to on or about January 31, 2009, in the
County of Los Angeles, defendants **NIV ISKIN, REVIV KARPMAN, TOMER KOGMAN,**
5 **AVRAHAM YECHIZKIA, BAREL ISKIN and JUAN PIERRE WASHINGTON,**
unlawfully took property, to wit: money for fictitious mortgage loan modification services, of a
6 value in excess of four hundred dollars (\$400) from another, to wit: homeowners referred by
affiliate [REDACTED] in violation of Penal Code section 487, subdivision (a), a felony.

7 **COUNT 64 - FORECLOSURE CONSULTANT –PROHIBITED ACTS**

8 On or about April 10, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
KARPMAN, TOMER KOGMAN, and AVRAHAM YECHIZKIA being foreclosure
9 consultants as defined by Civil Code section 2945.1 did unlawfully claim, demand, charge,
collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as
10 defined by Civil Code section 1695.1 to wit: [REDACTED] before fully
performing each and every service contracted, or otherwise represented, to be performed in
violation of Civil Code section 2945.4, subdivision (a), a felony.

11 **COUNT 65 - FORECLOSURE CONSULTANT –PROHIBITED ACTS**

12 On or about April 22, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
KARPMAN, TOMER KOGMAN, and AVRAHAM YECHIZKIA being foreclosure
13 consultants as defined by Civil Code section 2945.1 did unlawfully claim, demand, charge,
collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as
14 defined by Civil Code section 1695.1 to wit: [REDACTED] before fully performing
each and every service contracted, or otherwise represented, to be performed in violation of Civil
15 Code section 2945.4, subdivision (a), a felony.

16 **COUNT 66 - FORECLOSURE CONSULTANT –PROHIBITED ACTS**

17 On or about April 29, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
KARPMAN, TOMER KOGMAN, and AVRAHAM YECHIZKIA being foreclosure
18 consultants as defined by Civil Code section 2945.1 did unlawfully claim, demand, charge,
collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as
19 defined by Civil Code section 1695.1 to wit: [REDACTED], before fully performing each and
every service contracted, or otherwise represented, to be performed in violation of Civil Code
20 section 2945.4, subdivision (a), a felony.

21 **COUNT 67 - FORECLOSURE CONSULTANT –PROHIBITED ACTS**

22 On or about May 13, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
KARPMAN, TOMER KOGMAN, and AVRAHAM YECHIZKIA being foreclosure
23 consultants as defined by Civil Code section 2945.1 did unlawfully claim, demand, charge,
collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as
24 defined by Civil Code section 1695.1 to wit: [REDACTED], before fully performing each and
every service contracted, or otherwise represented, to be performed in violation of Civil Code
section 2945.4, subdivision (a), a felony.

25 **COUNT 68 - FORECLOSURE CONSULTANT –PROHIBITED ACTS**

26 On or about May 19, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
KARPMAN, TOMER KOGMAN, and AVRAHAM YECHIZKIA being foreclosure
27 consultants as defined by Civil Code section 2945.1 did unlawfully claim, demand, charge,
collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as
28 defined by Civil Code section 1695.1 to wit: [REDACTED], before fully
performing each and every service contracted, or otherwise represented, to be performed in

1 violation of Civil Code section 2945.4, subdivision (a), a felony.

2 **COUNT 69 - FORECLOSURE CONSULTANT –PROHIBITED ACTS**

3 On or about May 21, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
4 **KARPMAN, TOMER KOGMAN, and AVRAHAM YECHIZKIA** being foreclosure
5 consultants as defined by Civil Code section 2945.1 did unlawfully claim, demand, charge,
6 collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as
7 defined by Civil Code section 1695.1 to wit: [REDACTED], before fully performing each and
8 every service contracted, or otherwise represented, to be performed in violation of Civil Code
9 section 2945.4, subdivision (a), a felony.

6 **COUNT 70 - FORECLOSURE CONSULTANT –PROHIBITED ACTS**

7 On or about June 24, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
8 **KARPMAN, TOMER KOGMAN, and AVRAHAM YECHIZKIA** being foreclosure
9 consultants as defined by Civil Code section 2945.1 did unlawfully claim, demand, charge,
10 collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as
11 defined by Civil Code section 1695.1 to wit: [REDACTED], before fully performing
12 each and every service contracted, or otherwise represented, to be performed in violation of Civil
13 Code section 2945.4, subdivision (a), a felony.

11 **COUNT 71 - FORECLOSURE CONSULTANT –PROHIBITED ACTS**

12 On or about June 25, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
13 **KARPMAN, TOMER KOGMAN, and AVRAHAM YECHIZKIA** being foreclosure
14 consultants as defined by Civil Code section 2945.1 did unlawfully claim, demand, charge,
15 collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as
16 defined by Civil Code section 1695.1 to wit: [REDACTED], before fully performing each and
17 every service contracted, or otherwise represented, to be performed in violation of Civil Code
18 section 2945.4, subdivision (a), a felony.

15 **COUNT 72 - FORECLOSURE CONSULTANT –PROHIBITED ACTS**

16 On or about June 27, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
17 **KARPMAN, TOMER KOGMAN, and AVRAHAM YECHIZKIA** being foreclosure
18 consultants as defined by Civil Code section 2945.1 did unlawfully claim, demand, charge,
19 collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as
20 defined by Civil Code section 1695.1 to wit: [REDACTED], before fully performing
21 each and every service contracted, or otherwise represented, to be performed in violation of Civil
22 Code section 2945.4, subdivision (a), a felony.

20 **COUNT 73 - FORECLOSURE CONSULTANT –PROHIBITED ACTS**

21 On or about July 11, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
22 **KARPMAN, TOMER KOGMAN, and AVRAHAM YECHIZKIA** being foreclosure
23 consultants as defined by Civil Code section 2945.1 did unlawfully claim, demand, charge,
24 collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as
25 defined by Civil Code section 1695.1 to wit: [REDACTED] before fully performing each and
26 every service contracted, or otherwise represented, to be performed in violation of Civil Code
27 section 2945.4, subdivision (a), a felony.

24 **COUNT 74 - FORECLOSURE CONSULTANT –PROHIBITED ACTS**

25 On or about July 15, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
26 **KARPMAN, TOMER KOGMAN, and AVRAHAM YECHIZKIA** being foreclosure
27 consultants as defined by Civil Code section 2945.1 did unlawfully claim, demand, charge,
28 collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as
defined by Civil Code section 1695.1 to wit: [REDACTED], before fully performing each and every
service contracted, or otherwise represented, to be performed in violation of Civil Code section
2945.4, subdivision (a), a felony.

1 **COUNT 75 - FORECLOSURE CONSULTANT –PROHIBITED ACTS**

2 On or about July 23, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
3 **KARPMAN, TOMER KOGMAN, and AVRAHAM YECHIZKIA** being foreclosure
4 consultants as defined by Civil Code section 2945.1 did unlawfully claim, demand, charge,
5 collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as
6 defined by Civil Code section 1695.1 to wit: [REDACTED], before fully performing each and
7 every service contracted, or otherwise represented, to be performed in violation of Civil Code
8 section 2945.4, subdivision (a), a felony.

9 **COUNT 76 - FORECLOSURE CONSULTANT –PROHIBITED ACTS**

10 On or about July 25, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
11 **KARPMAN, TOMER KOGMAN, and AVRAHAM YECHIZKIA** being foreclosure
12 consultants as defined by Civil Code section 2945.1 did unlawfully claim, demand, charge,
13 collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as
14 defined by Civil Code section 1695.1 to wit: [REDACTED], before fully performing each and every
15 service contracted, or otherwise represented, to be performed in violation of Civil Code section
16 2945.4, subdivision (a), a felony.

17 **COUNT 77 - FORECLOSURE CONSULTANT –PROHIBITED ACTS**

18 On or about July 30, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
19 **KARPMAN, TOMER KOGMAN, and AVRAHAM YECHIZKIA** being foreclosure
20 consultants as defined by Civil Code section 2945.1 did unlawfully claim, demand, charge,
21 collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as
22 defined by Civil Code section 1695.1 to wit: [REDACTED], before fully performing
23 each and every service contracted, or otherwise represented, to be performed in violation of Civil
24 Code section 2945.4, subdivision (a), a felony.

25 **COUNT 78 - FORECLOSURE CONSULTANT –PROHIBITED ACTS**

26 On or about August 26, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
27 **KARPMAN, TOMER KOGMAN, and AVRAHAM YECHIZKIA** being foreclosure
28 consultants as defined by Civil Code section 2945.1 did unlawfully claim, demand, charge,
collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as
defined by Civil Code section 1695.1 to wit: [REDACTED], before fully performing each and every
service contracted, or otherwise represented, to be performed in violation of Civil Code section
2945.4, subdivision (a), a felony.

COUNT 79 - FORECLOSURE CONSULTANT –PROHIBITED ACTS

On or about September 2, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
KARPMAN, TOMER KOGMAN, and AVRAHAM YECHIZKIA being foreclosure
consultants as defined by Civil Code section 2945.1 did unlawfully claim, demand, charge,
collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as
defined by Civil Code section 1695.1 to wit: [REDACTED], before fully
performing each and every service contracted, or otherwise represented, to be performed in
violation of Civil Code section 2945.4, subdivision (a), a felony.

COUNT 80 - FORECLOSURE CONSULTANT –PROHIBITED ACTS

On or about September 17, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
KARPMAN, TOMER KOGMAN, and AVRAHAM YECHIZKIA being foreclosure
consultants as defined by Civil Code section 2945.1 did unlawfully claim, demand, charge,
collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as
defined by Civil Code section 1695.1 to wit: [REDACTED], before fully performing each and
every service contracted, or otherwise represented, to be performed in violation of Civil Code
section 2945.4, subdivision (a), a felony.

1 **COUNT 81 - FORECLOSURE CONSULTANT –PROHIBITED ACTS**

2 On or about October 10, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
3 **KARPMAN, TOMER KOGMAN, and AVRAHAM YECHIZKIA** being foreclosure
4 consultants as defined by Civil Code section 2945.1 did unlawfully claim, demand, charge,
5 collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as
6 defined by Civil Code section 1695.1 to wit: [REDACTED] before fully performing each
7 and every service contracted, or otherwise represented, to be performed in violation of Civil Code
8 section 2945.4, subdivision (a), a felony.

9 **COUNT 82 - FORECLOSURE CONSULTANT –PROHIBITED ACTS**

10 On or about October 17, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
11 **KARPMAN, TOMER KOGMAN, and AVRAHAM YECHIZKIA** being foreclosure
12 consultants as defined by Civil Code section 2945.1 did unlawfully claim, demand, charge,
13 collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as
14 defined by Civil Code section 1695.1 to wit: [REDACTED], before fully performing each
15 and every service contracted, or otherwise represented, to be performed in violation of Civil Code
16 section 2945.4, subdivision (a), a felony.

17 **COUNT 83 - FORECLOSURE CONSULTANT –PROHIBITED ACTS**

18 On or about October 23, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
19 **KARPMAN, TOMER KOGMAN, and AVRAHAM YECHIZKIA** being foreclosure
20 consultants as defined by Civil Code section 2945.1 did unlawfully claim, demand, charge,
21 collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as
22 defined by Civil Code section 1695.1 to wit: [REDACTED], before fully performing
23 each and every service contracted, or otherwise represented, to be performed in violation of Civil
24 Code section 2945.4, subdivision (a), a felony.

25 **COUNT 84 - FORECLOSURE CONSULTANT –PROHIBITED ACTS**

26 On or about October 30, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
27 **KARPMAN, TOMER KOGMAN, and AVRAHAM YECHIZKIA** being foreclosure
28 consultants as defined by Civil Code section 2945.1 did unlawfully claim, demand, charge,
collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as
defined by Civil Code section 1695.1 to wit: [REDACTED] before fully
performing each and every service contracted, or otherwise represented, to be performed in
violation of Civil Code section 2945.4, subdivision (a), a felony.

COUNT 85 - FORECLOSURE CONSULTANT –PROHIBITED ACTS

On or about November 7, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
KARPMAN, TOMER KOGMAN, and AVRAHAM YECHIZKIA being foreclosure
consultants as defined by Civil Code section 2945.1 did unlawfully claim, demand, charge,
collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as
defined by Civil Code section 1695.1 to wit: [REDACTED] before fully performing
each and every service contracted, or otherwise represented, to be performed in violation of Civil
Code section 2945.4, subdivision (a), a felony.

COUNT 86 - FORECLOSURE CONSULTANT –PROHIBITED ACTS

On or about November 10, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
KARPMAN, TOMER KOGMAN, and AVRAHAM YECHIZKIA being foreclosure
consultants as defined by Civil Code section 2945.1 did unlawfully claim, demand, charge,
collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as
defined by Civil Code section 1695.1 to wit: [REDACTED], before fully performing each and
every service contracted, or otherwise represented, to be performed in violation of Civil Code
section 2945.4, subdivision (a), a felony.

1 **COUNT 87 - FORECLOSURE CONSULTANT –PROHIBITED ACTS**

2 On or about November 13, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
3 **KARPMAN, TOMER KOGMAN, and AVRAHAM YECHIZKIA** being foreclosure
4 consultants as defined by Civil Code section 2945.1 did unlawfully claim, demand, charge,
5 collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as
6 defined by Civil Code section 1695.1 to wit: [REDACTED], before fully performing each and
7 every service contracted, or otherwise represented, to be performed in violation of Civil Code
8 section 2945.4, subdivision (a), a felony.

6 **COUNT 88 - FORECLOSURE CONSULTANT –PROHIBITED ACTS**

7 On or about December 3, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
8 **KARPMAN, TOMER KOGMAN, and AVRAHAM YECHIZKIA** being foreclosure
9 consultants as defined by Civil Code section 2945.1 did unlawfully claim, demand, charge,
10 collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as
11 defined by Civil Code section 1695.1 to wit: [REDACTED] before fully performing each and
12 every service contracted, or otherwise represented, to be performed in violation of Civil Code
13 section 2945.4, subdivision (a), a felony.

10 **COUNT 89 - FORECLOSURE CONSULTANT –PROHIBITED ACTS**

11 On or about December 15, 2008, in the County of Los Angeles, defendants **NIV ISKIN, REVIV**
12 **KARPMAN, TOMER KOGMAN, and AVRAHAM YECHIZKIA** being foreclosure
13 consultants as defined by Civil Code section 2945.1 did unlawfully claim, demand, charge,
14 collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as
15 defined by Civil Code section 1695.1 to wit: [REDACTED], before fully performing each and
16 every service contracted, or otherwise represented, to be performed in violation of Civil Code
17 section 2945.4, subdivision (a), a felony.

15 **COUNT 90 – TAX EVASION – FALSE RETURN**

16 On or about April 15, 2009, in the county of Los Angeles, defendant **NIV ISKIN** did willfully
17 and unlawfully file a false or fraudulent personal income tax return with the intent to evade taxes
18 imposed by Revenue and Tax section 17041 for tax year 2008, to wit: form 540 for Niv Iskin for
19 tax year 2008, in violation of Revenue and Taxation Code section 19705, a felony.

18 **COUNT 91 – TAX EVASION – FALSE RETURN**

19 On or about February 22, 2009, in the county of Los Angeles, defendant **REVIV KARPMAN**
20 did willfully and unlawfully file a false or fraudulent personal income tax return with the intent to
21 evade taxes imposed by Revenue and Tax section 17041 for tax year 2008, to wit: form 540 for
22 Reviv Karpman for tax year 2008, in violation of Revenue and Taxation Code section 19705, a
23 felony.

21 **COUNT 92 – TAX EVASION – FALSE RETURN**

22 On or about May 15, 2009, in the county of Los Angeles, defendant **TOMER KOGMAN** did
23 willfully and unlawfully file a false or fraudulent personal income tax return with the intent to
24 evade taxes imposed by Revenue and Tax section 17041 for tax year 2008, to wit: form 540 for
25 Tomer Kogman for tax year 2008, in violation of Revenue and Taxation Code section 19705, a
26 felony.

25 **COUNT 93 – TAX EVASION – FALSE RETURN**

26 On or about June 15, 2009, in the county of Los Angeles, defendant **AVRAHAM AVI**
27 **YECHIZKIA** did willfully and unlawfully file a false or fraudulent personal income tax return
28 with the intent to evade taxes imposed by Revenue and Tax section 17041 for tax year 2008, to
wit: form 540 for Avraham Avi Yechizkia for tax year 2008, in violation of Revenue and
Taxation Code section 19705, a felony.

1 **COUNT 94 – TAX EVASION – FAILURE TO FILE**

2 On or about March 15, 2009, in the county of Los Angeles, defendants **NIV ISKIN, REVIV**
3 **KARPMAN, TOMER KOGMAN, and AVRAHAM AVI YECHIZKIA** did willfully and
4 unlawfully fail to fail a corporate income tax return with the intent to evade taxes imposed by
Revenue and Tax section 17041 for tax year 2008, to wit: form 540 for Mason Capital Group,
LLC for tax year 2008, in violation of Revenue and Taxation Code section 19706, a felony.

5 **COUNT 95 – TAX EVASION – FAILURE TO FILE**

6 On or about March 15, 2009, in the county of Los Angeles, defendants **NIV ISKIN, REVIV**
7 **KARPMAN, TOMER KOGMAN, and AVRAHAM AVI YECHIZKIA** did willfully and
8 unlawfully fail to fail a corporate income tax return with the intent to evade taxes imposed by
Revenue and Tax section 17041 for tax year 2008, to wit: form 540 for American Financial
Group, LLC for tax year 2008, in violation of Revenue and Taxation Code section 19706, a
felony.

9 **COUNT 96 – TAX EVASION – FAILURE TO FILE**

10 On or about March 15, 2009, in the county of Los Angeles, defendants **NIV ISKIN, REVIV**
11 **KARPMAN, TOMER KOGMAN, and AVRAHAM AVI YECHIZKIA** did willfully and
12 unlawfully fail to fail a corporate income tax return with the intent to evade taxes imposed by
Revenue and Tax section 17041 for tax year 2008, to wit: form 540 for Gretchen Fox and
Associates, LLC for tax year 2008, in violation of Revenue and Taxation Code section 19706, a
felony.

13 **COUNT 97 – CONSPIRACY**

14 On and between January 1, 2008 and June 30, 2009, in the County of Los Angeles defendants
15 **GARY ARNOLD EISENBERG, BAREL ISKIN, NIV ISKIN, IRA ITSKOWITZ, REVIV**
16 **KARPMAN, TOMER KOGMAN, GREGG SCOTT QUINN, JUAN PIERRE**
17 **WASHINGTON, and AVRAHAM YECHIZKIA** did unlawfully conspire together and with
another person and persons whose identity is unknown to commit a crime in violation of Section
182 subdivision (a)(1) of the Penal Code, to wit: grand theft, in violation of Section 487
subdivision (a) of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the
objectives and purposes of the aforesaid conspiracy, the said defendants committed the following
overt act and acts at and in the County of Los Angeles:

18 OVERT ACT 1: Between January 2008 and June 2009, **GARY ARNOLD EISENBERG,**
19 **BAREL ISKIN , NIV ISKIN, IRA ITSKOWITZ, REVIV KARPMAN, TOMER**
20 **KOGMAN, GREGG SCOTT QUINN, JUAN PIERRE WASHINGTON, and AVRAHAM**
21 **YECHIZKIA** dba Mason Capital Group, LLC and American Financial Group and Planning,
LLC engaged in, or caused others to engage in, telemarketing to fraudulently induce homeowners
to pay for loan modification services.

22 OVERT ACT 2: Between January 2008 and June 2009, **GARY ARNOLD EISENBERG,**
23 **BAREL ISKIN , NIV ISKIN, IRA ITSKOWITZ, REVIV KARPMAN, TOMER**
24 **KOGMAN, GREGG SCOTT QUINN, JUAN PIERRE WASHINGTON, and AVRAHAM**
25 **YECHIZKIA** falsely represented, or caused others to falsely represent, in written and oral
statements that Gretchen Fox and Associates, LLC was an independent company with attorneys
who negotiated loan modifications on behalf of homeowners.

26 OVERT ACT 3: Between November and December 2008, **NIV ISKIN, REVIV KARPMAN,**
27 **TOMER KOGMAN, and AVRAHAM YECHIZKIA** employed suspended attorney A. Bryan
28 Diaz, in part, to give the appearance of having legal counsel for homeowners.

1 OVERT ACT 4: Between January 2008 and June 2009, **GARY ARNOLD EISENBERG,**
2 **BAREL ISKIN , NIV ISKIN, IRA ITSKOWITZ, REVIV KARPMAN, TOMER**
3 **KOGMAN, GREGG SCOTT QUINN, JUAN PIERRE WASHINGTON, and AVRAHAM**
4 **YECHIZKIA** falsely represented, or caused others to falsely represent, in written and oral
5 statements a high rate of success and expertise in obtaining loan modifications.

6 OVERT ACT 5: Between January 2008 and June 2009, **NIV ISKIN, REVIV KARPMAN,**
7 **TOMER KOGMAN, and AVRAHAM YECHIZKIA,** offered a 100% guaranteed refund to
8 induce homeowners to pay for loan modification services but routinely avoided making refunds
9 by (1) evading demands for a refund, (2) changing business names, (3) voiding the refund
10 guarantee if homeowners contacted their lender, or (4) making a deceptive reinstatement offer in
11 satisfaction of the guarantee.

12 OVERT ACT 6: Between January 2008 and June 2009, **TOMER KOGMAN** created and
13 maintained, or caused others to create and maintain, the following websites to fraudulently induce
14 homeowners to pay for loan modification services: www.masoncapitalgroup.org,
15 www.gretchenfox.org, and www.afgtoday.com.

16 OVERT ACT 7: Between January 2008 and May 2009, **TOMER KOGMAN** created or caused
17 others to create E-mail blasts sent to thousands of homeowners to fraudulently induce them to pay
18 for loan modification services.

19 OVERT ACT 8: On November 8, 2004, **NIV ISKIN, REVIV KARPMAN, TOMER**
20 **KOGMAN, and AVRAHAM YECHIZKIA** obtained New Mexico Public Regulation
21 Commission Certificate of Organization #2518397 for Gretchen Fox and Associates, LLC.

22 OVERT ACT 9: On April 24, 2007, **NIV ISKIN, REVIV KARPMAN, TOMER KOGMAN,**
23 **and AVRAHAM YECHIZKIA** obtained New Mexico Public Regulation Commission
24 Certificate of Organization #2870210 for Mason Capital Group, LLC.

25 OVERT ACT 10: On April 7, 2008, **NIV ISKIN, REVIV KARPMAN, TOMER KOGMAN,**
26 **and AVRAHAM YECHIZKIA** obtained City of Los Angeles business permit #002326917-
27 0001-01 for Mason Capital Group, LLC, 18375 Ventura Boulevard #354, Tarzana, California.

28 OVERT ACT 11: On October 8, 2008, **NIV ISKIN, REVIV KARPMAN, TOMER**
KOGMAN, and AVRAHAM YECHIZKIA filed, or caused to be filed, an application for
registration as a foreign limited liability company for Gretchen Fox and Associates, LLC with the
California Secretary of State but failed to comply with registration requirements and were not
issued an identification number for doing business in California.

OVERT ACT 12: On October 14, 2008, **NIV ISKIN, REVIV KARPMAN, TOMER**
KOGMAN, and AVRAHAM YECHIZKIA obtained New Mexico Public Regulation
Commission Certificate of Organization #4094256 for American Financial Group and Planning,
LLC.

OVERT ACT 13; On December 4, 2008, **NIV ISKIN, REVIV KARPMAN, TOMER**
KOGMAN, and AVRAHAM YECHIZKIA filed, or caused to be filed, Articles of
Incorporation for American Financial Group and Planning, LLC with the California Secretary of

1 State but failed to comply with registration requirements for a foreign limited liability company
2 and were not issued an identification number for doing business in California.

3 OVERT ACT 14: Between January 2008 and June 2009, **NIV ISKIN, REVIV KARPMAN,**
4 **TOMER KOGMAN, and AVRAHAM YECHIZKIA** used the following postal boxes for
5 delivery of money and correspondence for Mason Capital Group, LLC, American Financial
6 Group and Planning, LLC, and Gretchen Fox and Associates, LLC received from homeowners
7 for loan modification services: 4942 Balboa Boulevard #614, Encino; 18375 Ventura Boulevard
8 #354, Tarzana; and 7210 Jordon Avenue #C42 and C44, Canoga Park.

9 OVERT ACT 15: Between January 2008 and March 2009, **NIV ISKIN, REVIV KARPMAN,**
10 **TOMER KOGMAN, and AVRAHAM YECHIZKIA** dba Mason Capital Group, LLC, used
11 Bank of America account [REDACTED] for the deposit,
12 withdrawal, and transfer of funds fraudulently obtained from homeowners for loan modification
13 services.

14 OVERT ACT 16: Between January 2008 and May 2009, **NIV ISKIN, REVIV KARPMAN,**
15 **TOMER KOGMAN, and AVRAHAM YECHIZKIA** dba Gretchen Fox and Associates, LLC,
16 used Bank of America account [REDACTED] for the deposit, withdrawal, and
17 transfer of funds fraudulently obtained from homeowners for loan modification services.

18 OVERT ACT 17: Between January and June 2008, **NIV ISKIN** dba Quick Cash Lending, LLC
19 and National Credit Services held Group ISO account [REDACTED],
20 respectively, for processing and settlement of credit card payments fraudulently obtained from
21 homeowners for loan modification services.

22 OVERT ACT 18: Between January and August 2008, **TOMER KOGMAN** dba Money Tree
23 Lending, LLC held American Express account [REDACTED] for processing and settlement of
24 credit card payments fraudulently obtained from homeowners for loan modification services.

25 OVERT ACT 19: Between July 2008 and June 2009, **REVIV KARPMAN,** dba Mason Capital
26 Group, LLC opened Group ISO account [REDACTED] and American Express account [REDACTED]
27 [REDACTED] for processing and settlement of credit card payments fraudulently obtained from
28 homeowners for loan modification services.

OVERT ACT 20: Between October 2008 and June 2009, **NIV ISKIN, REVIV KARPMAN,**
TOMER KOGMAN, and AVRAHAM YECHIZKIA dba American Financial Group and
Planning, LLC, used Bank of America account [REDACTED] for the deposit,
withdrawal, and transfer of funds fraudulently obtained from homeowners for loan modification
services.

OVERT ACT 21: Between April 2008 and January 2009, **REVIV KARPMAN** withdrew
\$179,326 in funds fraudulently obtained from homeowners for loan modification services from
Mason Capital Group, LLC, Bank of America account [REDACTED] for his personal use.

OVERT ACT 22: Between April 2008 and January 2009, **NIV ISKIN** withdrew \$148,506 in
funds fraudulently obtained from homeowners for loan modification services from Mason Capital
Group, LLC, Bank of America account [REDACTED] for his personal use.

1 OVERT ACT 23: Between April 2008 and January 2009, \$144,786 in funds fraudulently
2 obtained for loan modification services was deposited into Bank of America account █
3 █ held by **TOMER KOGMAN** dba E-PAGE, LLC for his personal use.

4 OVERT ACT 24: Between April 2008 and January 2009, \$134,228 in funds fraudulently
5 obtained for loan modification services was deposited into Bank of America account █
6 █ held by **AVRAHAM YECHIZKIA** dba Moneytree LLC for his personal use.

7 OVERT ACT 25: Between January 2008 and March 2009, **GARY ARNOLD EISENBERG**
8 received \$96,965 in funds fraudulently obtained from homeowners for loan modification services
9 as payment for telemarketing sales commissions and bonuses.

10 OVERT ACT 26: Between January 2008 and May 2009, **BAREL ISKIN** received \$53,801 in
11 funds fraudulently obtained from homeowners for loan modification services as payment for his
12 salary as affiliate sales manager.

13 OVERT ACT 27: Between February 2008 and January 2009, **GREGG SCOTT QUINN**
14 received \$74,257 in funds fraudulently obtained from homeowners for loan modification services
15 as payment for his salary as a sales manager.

16 OVERT ACT 28: Between July 2008 and February 2009, **IRA ITSKOWITZ** received \$43,239
17 in funds fraudulently obtained from homeowners for loan modification services as payment for
18 his salary as a sales manager.

19 OVERT ACT 29: Between September 2008 and May 2009, **JUAN PIERRE WASHINGTON**
20 received \$21,489 in funds fraudulently obtained from homeowners for loan modification services
21 as payment for sales commissions and salary as an assistant affiliate sales manager.

22 **FIRST SPECIAL ALLEGATION – EXCESSIVE TAKING**

23 It is further alleged that the property taken by Defendants **NIV ISKIN, REVIV KARPMAN,**
24 **TOMER KOGMAN, and AVRAHAM YECHIZKIA** in the commission of the felonies alleged
25 in counts 1 through 63 and 97 which property Defendant intended to take, was of a value in
26 excess of \$1,300,000 within the meaning of Penal Code section 12022.6, subdivision (a)(3).

27 **SECOND SPECIAL ALLEGATION - AGGRAVATED WHITE-COLLAR CRIME**

28 It is further alleged that Defendants **NIV ISKIN, REVIV KARPMAN, TOMER KOGMAN,**
and **AVRAHAM YECHIZKIA** committed two or more related felonies, to wit: counts 1
through 63 and 97, a material element of which is fraud, involving a pattern of related felony
conduct and the taking of more than \$500,000 within the meaning of Penal Code section 186.11,
subdivision (a) subsection (2).

THIRD SPECIAL ALLEGATION – PRISON PRIOR

It is further alleged pursuant to Penal Code Section 667.5, subdivision (b) that defendant **IRA ITSKOWITZ**, has suffered the following prior conviction(s):

<u>Court Case</u>	<u>Code/Statute</u>	<u>Conviction</u>	<u>County</u>	<u>State</u>	<u>Court Type</u>
99CR2080	18 U.S.C.A. §§ 1341, 1343	7/13/01	San Diego	CA	Federal
99CR2147	18 U.S.C.A. §§ 1341, 1343	7/13/01	San Diego	CA	Federal

1 and that a term was served as described in Penal Code section 667.5 for said offense(s), and that
2 said defendant did not remain free of prison custody for, and did commit an offense resulting in a
3 felony conviction, during a period of five years subsequent to the conclusion of said term.

3 **FOURTH SPECIAL ALLEGATION – PRISON PRIOR**

4 It is further alleged pursuant to Penal Code Section 667.5, subdivision (b) that defendant **GARY**
5 **ARNOLD EISENBERG**, has suffered the following prior conviction:

<u>Court Case</u>	<u>Code/Statute</u>	<u>Conviction</u>	<u>County</u>	<u>State</u>	<u>Court Type</u>
2:02-cr-00897-R	18 U.S.C.A. §§ 1341	12/16/02	Los Angeles	CA	Federal

6 and that a term was served as described in Penal Code section 667.5 for said offense(s), and that
7 said defendant did not remain free of prison custody for, and did commit an offense resulting in a
8 felony conviction. during a period of five years subsequent to the conclusion of said term.

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