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Attorneys for Plaintiff  
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICHARD AYVAZYAN,  
aka "Richard Avazian" and  
"Iuliia Zhadko,"  
MARIETTA TERABELIAN,  
aka "Marietta Abelian" and  
"Viktoria Kauichko,"  
ARTUR AYVAZYAN,  
aka "Arthur Ayvazyan,"  
TAMARA DADYAN,  
MANUK GRIGORYAN,  
aka "Mike Grigoryan," and  
"Anton Kudiumov,"  
ARMAN HAYRAPETYAN,  
EDVARD PARONYAN,  
aka "Edvard Paronian" and  
"Edward Paronyan," and  
VAHE DADYAN,

Defendants.

CR 20-579(A)-SVW

GOVERNMENT'S EX PARTE APPLICATION  
FOR ORDER SEALING FIRST  
SUPERSEDING INDICTMENT AND RELATED  
DOCUMENTS; DECLARATION OF BRIAN  
FAERSTEIN

**(UNDER SEAL)**

The government hereby applies ex parte for an order that the first superseding indictment and any related documents in the above-titled case (except the arrest warrants for the newly-charged

1 defendants) be kept under seal until one of the four new defendants  
2 charged in the first superseding indictment (defendants Manuk  
3 Grigoryan, Arman Hayrapetyan, Edvard Paronyan, or Vahe Dadyan) is  
4 arrested and the government files a "Report Commencing Criminal  
5 Action" in this matter relating to that defendant.

6 This ex parte application is made pursuant to Federal Rule of  
7 Criminal Procedure 6(e)(4) and is based on the attached declaration  
8 of Brian Faerstein.

9 Dated: March 9, 2021

Respectfully submitted,

10 TRACY L. WILKISON  
Acting United States Attorney

11 BRANDON D. FOX  
12 Assistant United States Attorney  
13 Chief, Criminal Division

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15 BRIAN FAERSTEIN  
16 SCOTT PAETTY  
Assistant United States Attorneys

17 Attorneys for Plaintiff  
UNITED STATES OF AMERICA  
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**DECLARATION OF BRIAN FAERSTEIN**

I, Brian Faerstein, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I am one of the prosecutors representing the government in the prosecution of United States v. Richard Ayvazyan, et al., the first superseding indictment in which is being presented to a federal grand jury in the Central District of California on March 9, 2021.

2. Four of the defendants who are charged in the first superseding indictment in the above-captioned proceeding but were not charged in the initial indictment -- defendants Manuk Grigoryan, Arman Hayrapetyan, Edvard Paronyan, and Vahe Dadyan -- have not been taken into custody on the charges contained in the first superseding indictment. Moreover, those four defendants have not been informed that they are being named as defendants in the first superseding indictment. The likelihood of apprehending one or more of the new defendants to be charged might be jeopardized if the first superseding indictment in this case were made publicly available before any of the four newly-charged defendants are taken into custody on the first superseding indictment.

3. Accordingly, the government requests that the first superseding indictment and sealed documents in this case (except the arrest warrants) be sealed and remain so until one of the four new defendants charged in the first superseding indictment (defendants Manuk Grigoryan, Arman Hayrapetyan, Edvard Paronyan, or Vahe Dadyan) is arrested and the government files a "Report Commencing Criminal Action" in this matter relating to that defendant.

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1           4. I declare under penalty of perjury under the laws of the  
2 United States of America that the foregoing is true and correct and  
3 that this declaration is executed at Los Angeles, California, on  
4 March 9, 2021.

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6 BRIAN FAERSTEIN  
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