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UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. RICHARD AYVAZYAN, Aka "Richard Ayazian" and "Iuliia Zhadko," et al. Defendants.	No. CR 20-00579-SVW GOVERNMENT'S FIRST BILL OF PARTICULARS RE FORFEITURE ALLEGATIONS

Notice is hereby given that the government, pursuant to the forfeiture allegations set out in the First Superseding Indictment, intends to seek the criminal forfeiture of the following specific property:

a. $14,620.00 in U.S. Currency seized during the execution of a federal search warrant on November 5, 2020, in Encino, California, at the residence of defendants Tamara Dadyan ("Dadyan") and Artur Ayvazyan ("A. Ayvazyan");

b. $74,557.79 in Bank funds seized pursuant to a federal seizure warrant executed on November 20, 2020, from Bank of America account number ending in 7695 held in the name of Allstate Towing & Transport LLC;

c. $451,185.00 in U.S. Currency seized on November 5, 2020, during the execution of a federal search warrant in various areas and back yard of the Tarzana, California residence (APN: 2176-029-031);

d. Twenty-six items of miscellaneous jewelry and precious items seized on November 5, 2020, during the execution of a federal search warrant at the Tarzana, California residence (APN: 2176-029-031), consisting of:

a. One Santos De Cartier stainless steel wrist watch, model 4183, serial number 163389YX;

b. One Audermars Piguet, Royal Oak 18 carat rose gold wrist watch, model 26331, serial number J52335;

c. One Rolex Datajust stainless steel wrist watch, model 126200, serial number 7P49V141;

d. One Rolex Datajust stainless steel wrist watch, model 279160, serial number 7R3023F3;

e. One Rolex Datajust stainless steel wrist watch, model 126334, serial number 4U95Z313;

f. One Cartier Chronoscaph 21 stainless steel wrist watch, model 2424, serial number 880317LX;

g. One Rolex Day-Date 18 carat yellow gold wrist watch, model 18238, serial number N146130;

h. One Audemars Piguet, Royal Oak Offshore black ceramic wrist watch, serial number K23313;

i. One Audemars Piguet Royal Oak Offshore black ceramic wrist watch, serial number LU44845K;

j. Audemars Piguet Royal Oak stainless steel wrist watch, serial number LW3397N;

k. One 1979 Gold Bullion Coin;

l. Two 1980 Gold Bullion Coins;

m. Ten 1982 Gold Bullion Coins;

n. Seventeen 1983 Gold Bullion Coins;

o. Five 1984 Gold Bullion Coins;

p. Five 1985 Gold Bullion Coins;

q. Ten 1986 Gold Bullion Coins;

r. Ten 1987 Gold Bullion Coins;

s. One 18 carat white gold ring marked 18 D185;

t. One 14 carat white gold ring marked 14

u. One 18 carat white gold ring marked 18k

v. One 14 carat white gold ring marked 14k 585 DJ;

w. One 14 carat white gold ring marked 14k RRA;

x. One 21 carat yellow gold neck chain marked 21k;

y. One 14 carat rose tint gold pendant, cross-shaped; and

z. One Platinum ring, marked Plat 950;

e. Thirteen items of miscellaneous jewelry and precious items seized on October 20, 2020, from R. Ayvazyan and Terabelian at the Miami International Airport, consisting of:

a. One Rolex Yacht-Master II watch, model 116681, serial number C32K8231;

b. One Rolex Day-Date 40 watch, model W6685656;

c. One Rolex Day-Date watch, serial number W44P7238;

d. One Pair of 14 carat white gold earrings with diamond studs;

e. One pair of 18 carat white gold earrings with diamonds;

f. One 14 carat yellow gold ring with 26 diamonds;

g. One 14 carat white gold bracelet with 2 rows of diamonds;

h. One 14 carat yellow gold 24” neck chain;

i. One 14 carat yellow gold cross pendant;

j. One 14 carat yellow gold 16” neck chain;

k. One 18 carat white gold bracelet double chain link “Evil Eye” with diamonds; and

l. One fabric cord bracelet with 18 carat white gold clasp and diamond “Evil Eye”;

f. $3,422.00.00 in U.S. Currency seized on November 20, 2020, from R. Ayvazyan and Terabelian at the Miami International Airport;

g. Ledger re Nanos Cryptocurrency Hardware Wallet seized on November 5, 2020, during the execution of a federal search warrant at the Tarzana, California residence (APN:2176-029-031); and

h. $65,990.43 in Bank funds seized pursuant to a federal seizure warrant executed on December 2, 2020, from Bank of America account ending in '9700 in the name of Runyan Tax Service Inc.

Dated: March 25, 2021

Respectfully submitted,

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/s/Brent A. Whittlesey
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