DECLARATION OF BRIAN FAERSTEIN

I, Brian Faerstein, hereby declare and state as follows:

I am an Assistant United States Attorney at the U.S. Attorney's Office for the Central District of California. I am an attorney assigned to the case of United States v. Richard Ayvazyan et al., No. 20-CR-579(A)-SVW. I submit this declaration in support of the government's Ex Parte Application for Modified Protective Order.

1. Between October 20, 2020, and November 5, 2020, law enforcement arrested defendants Richard Ayvazyan ("R. Ayvazyan), Marietta Terabelian, Arthur Ayvazyan ("A. Ayvazyan"), and Tamara Dadyan ("T. Dadyan"), searched their residences, and seized evidence relating to their criminal activities.

2. Following the Court's entry of a protective order on Friday, December 11, 2020 (ECF 92), the government made its first production of copies of discovery to counsel to the original four defendants in this case (identified in paragraph number 1 above) on Monday, December 14, 2020.

3. Exhibit 1 is a true and correct copy of the government's letter to counsel for the four original defendants on December 14, 2020, with certain redactions made for the names of individual and institutional victims in this case.

4. Based on information provided to me by Federal Bureau of Investigation Special Agent Justin Palmerton, I know that, on December 17, 2020, the government made available evidence seized pursuant to premises search warrants executed in this case to counsel for the original four defendants so that counsel could inspect and copy the evidence, which counsel did. The evidence inspected by counsel included dozens of fake and stolen identification documents,

including fake and stolen driver's licenses, Social Security cards, and credit cards seized from defendants A. Ayvazyan's and T. Dadyan's residence on November 5, 2020. In addition, between December 17, 2020, and December 21, 2020, the government made three additional productions of copies of discovery to counsel to the original four defendants.

5. Exhibit 2 is a true and correct copy of photographs depicting examples of the fake and stolen California driver's licenses, Social Security cards, and credit cards found during law enforcement's search of defendants A. Ayvazyan's and T. Dadyan's residence on or about November 5, 2020. These documents were Bates-stamped DOJ_PROD_0000028011, DOJ_PROD_0000028013, DOJ_PROD_0000028015, DOJ_PROD_0000028019, and DOJ_PROD_0000028021, and produced in discovery.

6. During the week of March 22, 2021, the government produced virtually all of the discovery materials to counsel for the four newly-charged defendants in this case (defendants Manuk Grigoryan, Arman Hayrapetyan, Edvard Paronyan, and Vahe Dadyan) that previously had been produced to counsel for the original four defendants, with the exception of the complete forensic images of digital devices that had been seized from the original four defendants.

7. Exhibit 3 are true and correct copies of monthly bank account statements for four bank accounts in the name of "Iuliia Zhadko" or "Turing Info Solutions, Inc." (for which Iuliia Zhadko is a signatory), including bank accounts ending in account numbers x5268, x6822, x6994, and x2757, respectively, between September 2020 and January 2021. These documents were Bates-stamped DOJ_PROD_0000099291 – DOJ_PROD_0000099302 (account x5268);

DOJ_PROD_0000099279 – DOJ_PROD_0000099288 (account x6822); DOJ_PROD_0000099267 – DOJ_PROD_0000099276 (account x6994); and DOJ_PROD_0000099305 – DOJ_PROD_0000099309, and DOJ_PROD_0000099351 – DOJ_PROD_0000099354 (account x2757), respectively, and produced in discovery.

8. Exhibit 4 is a true and correct copy of a photograph of a digital image of a fake California driver's license in the name of "Iuliia Zhadko." This document was Bates-stamped DOJ_PROD_0000002030, and produced in discovery on December 14, 2020.

9. Exhibit 5 is a true and correct copy of a photograph of a digital image of a second fake California driver's license in the name of "Iuliia Zhadko." This document was Bates-stamped DOJ_PROD_0000002032, and produced in discovery on December 14, 2020.

10. Exhibit 6 is a true and correct copy of a photograph of a digital image of a fake Social Security card in the name of "Iuliia Zhadko." This document was Bates-stamped DOJ_PROD_0000002039, and produced in discovery on December 14, 2020.

11. Exhibit 7 is a true and correct copy of a photograph of a digital image of a second fake Social Security card in the name of "Iuliia Zhadko." This document was Bates-stamped DOJ_PROD_0000002041, and produced in discovery on December 14, 2020.

12. Exhibit 8 are true and correct copies of photographs of digital images of handwritten notes listing retail bank and brokerage account numbers, login credentials, and pin numbers relating to aliases, addresses, and fake businesses used to apply for PPP and EIDL loans. These documents were Bates-stamped DOJ_PROD_0000002049 – Bates DOJ_PROD_0000002050, and produced in discovery on December 14, 2020.

13. Exhibit 9 is a true and correct copy of a photograph of a digital image of handwritten notes containing detailed information about PPP and EIDL loans submitted on behalf of fake and stolen businesses. This document was Bates-stamped DOJ_PROD_0000002054, and produced in discovery on December 14, 2020.

14. Exhibit 10 is a true and correct copy of a photograph of a digital image of a fake or stolen United States Passport Card in the name of "Viktoria Kauchko." This document was Bates-stamped DOJ_PROD_0000002051, and produced in discovery on December 14, 2020.

15. Exhibit 11 is a true and correct copy of a photograph of a digital image of a fake California driver's license in the name of "Viktoria Kauichko." This document was Bates-stamped DOJ_PROD_0000002055, and produced in discovery on December 14, 2020.

16. Exhibit 12 is a true and correct copy of account opening documents for an online brokerage account in the name of "Iuliia Zhadko." This document was Bates-stamped DOJ_PROD_0000055403 - DOJ_PROD_0000055405, and produced in discovery.

17. Exhibit 13 are true and correct copies of an excerpt of the account profile and supporting identification documents for a cryptocurrency account in the name of "Iuliia Zhadko." These documents were Bates-stamped DOJ_PROD_0000130410 - DOJ_PROD_0000130413, and produced in discovery.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed at Los Angeles, California, on March 29, 2021.

BRIAN FAERSTEIN