EXHIBIT 1

United States Department of Justice

United States Attorney's Office
Central District of California

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BY FEDEX & EMAIL

December 14, 2020

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Counsel for Tamara Dadyan

Re: United States v. Ayvazyan et. al,
No. CR 2:20-cr-00579-SVW
Discovery Production Volume 1

Dear Counsel:

Pursuant to your clients' requests for discovery and the protective order to be entered by the Court (see CR 90), enclosed please find an encrypted disc with discovery bearing Bates Numbers DOJ_PROD_0000000001 to DOJ_PROD_0000003834 and an attached index.[1] These discovery materials are also being uploaded to Steptoe & Johnson's file sharing system as you requested. The government will continue to produce any additional discovery materials to which your clients are entitled on a rolling basis as they are processed and become available for production.

[1] The password to access the discovery materials will be emailed to you separately.

The government will make available for your inspection any item of evidence referred to above, as well as any other evidence seized from your client and/or which the government intends to offer in its case-in-chief. Please contact me to arrange a mutually convenient time for your inspection of such items.

The government will produce to you any additional Jencks material—including any relevant grand jury transcripts, assuming a Rule 6(e) order has been issued—one week before trial if you agree to the production of reciprocal Jencks material at that time or affirmatively represent that you have no Jencks material to produce. Please inform me whether such an arrangement is acceptable to you.

The enclosed materials and information and any future discovery provided to you may exceed the scope of discovery mandated by the Federal Rules of Criminal Procedure, federal statute or relevant case law, and this discovery is provided voluntarily and solely as a matter of discretion. By producing such materials to you, the government does not waive its right to object to any future discovery requests beyond the scope of its legal obligations.

With this letter the government requests all reciprocal discovery to which it is entitled under Rules 16(b) and 26.2 of the Federal Rules of Criminal Procedure. The government also requests notice of any intention of your client to rely on an entrapment defense, or a defense involving mental condition or duress, and/or an alibi defense. Pursuant to Federal Rule of Criminal Procedure 12.1, the dates, times, and places of the charged offenses are detailed within the documents included within the discovery. Please contact me immediately if you believe that this notice is insufficient.

Please let me know if you have any questions, or would like to further discuss any of the matters raised above.

Very truly yours,

Julian André

JULIAN L. ANDRÉ
Assistant United States Attorney
Major Frauds Section

Christopher Fenton
Trial Attorney
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Enclosure

United States v. Ayvazyan et. al
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Description	Production BEGDOC	Production ENDDOC
[redacted]: ABC Realty Advisors, Inc.	DOJ_PROD_0000000001	DOJ_PROD_0000000084
[redacted]: Allstate Towing and Transport LLC	DOJ_PROD_0000000085	DOJ_PROD_0000000119
California Employment Development Department Records	DOJ_PROD_0000000120	DOJ_PROD_0000000154
[redacted]: Mod Interiors, Inc. #9623977207	DOJ_PROD_0000000155	DOJ_PROD_0000000193
[redacted]: Mod Interiors, Inc. #3350827705	DOJ_PROD_0000000194	DOJ_PROD_0000000206
[redacted]: Time Line Transport #1764807406	DOJ_PROD_0000000207	DOJ_PROD_0000000216
[redacted]: Top Quality Contracting #3728857706 M[redacted] Z[redacted] d/b/a Top Quality Contracting #8311047304	DOJ_PROD_0000000217	DOJ_PROD_0000000294
[redacted]: Mod Interiors, Inc. #3350827705	DOJ_PROD_0000000295	DOJ_PROD_0000000311
[redacted]: Time Line Transport #1764807406	DOJ_PROD_0000000312	DOJ_PROD_0000000316
[redacted]: Time Line Transport #8007	DOJ_PROD_0000000317	DOJ_PROD_0000000341
[redacted]: M[redacted] Z[redacted] d/b/a Top Quality Contracting #8311047304	DOJ_PROD_0000000342	DOJ_PROD_0000000345
[redacted]: Fiber One Media	DOJ_PROD_0000000346	DOJ_PROD_0000000374
[redacted]: Redline Auto Collision	DOJ_PROD_0000000375	DOJ_PROD_0000000414
[redacted]: Redline Auto Mechanics	DOJ_PROD_0000000415	DOJ_PROD_0000000443
[redacted]: Redline Auto Mechanics	DOJ_PROD_0000000444	DOJ_PROD_0000000448
[redacted]: Time Line Transport #1764807406	DOJ_PROD_0000000449	DOJ_PROD_0000000453
[redacted]: Secureline Realty and Funding Loan Application and Bank Statements	DOJ_PROD_0000000454	DOJ_PROD_0000000502
[redacted]: Time Line Transport #18941035	DOJ_PROD_0000000503	DOJ_PROD_0000000506
[redacted]: Top Quality Contracting #1092007202	DOJ_PROD_0000000507	DOJ_PROD_0000000571
[redacted]: Fiber One Media (Viktoria Kauichko)	DOJ_PROD_0000000572	DOJ_PROD_0000000652

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[redacted]: Letter of No Records	DOJ_PROD_0000000653	DOJ_PROD_0000000655
[redacted]: Secureline Realty and Funding, Inc. (Tamara Dadyan) PPP Application	DOJ_PROD_0000000656	DOJ_PROD_0000000785
[redacted]: Allstate Towing and Transport LLC	DOJ_PROD_0000000787	DOJ_PROD_0000000832
[redacted]: G&A Diamonds	DOJ_PROD_0000000833	DOJ_PROD_0000000877
[redacted]: Timeline Transport (Iuliia Zhadko)	DOJ_PROD_0000000878	DOJ_PROD_0000000948
[redacted]: TM Events (Anton Kudiomov)	DOJ_PROD_0000000949	DOJ_PROD_0000001013
[redacted]: Mod Interiors LLC	DOJ_PROD_0000001014	DOJ_PROD_0000001161
[redacted]: Runyan Tax Services (Viktoria Kauichko)	DOJ_PROD_0000001162	DOJ_PROD_0000001232
SBA EIDL - All State Towing #1141138101 (Artur Ayvazyan)	DOJ_PROD_0000001233	DOJ_PROD_0000001306
SBA EIDL - Fadehaus Barbershop #8740807904	DOJ_PROD_0000001307	DOJ_PROD_0000001377
SBA EIDL - Fiber One #73453379-00	DOJ_PROD_0000001378	DOJ_PROD_0000001448
SBA EIDL - Fiber One Media #51581579-00	DOJ_PROD_0000001449	DOJ_PROD_0000001522
SBA EIDL - G&A Diamonds #4373237909	DOJ_PROD_0000001523	DOJ_PROD_0000001595
SBA EIDL - Journeymen Construction #92297574-09	DOJ_PROD_0000001596	DOJ_PROD_0000001650
SBA EIDL - Nelson's Nursery #6939687903	DOJ_PROD_0000001651	DOJ_PROD_0000001721
SBA EIDL - Redline Auto Collision #6498697801	DOJ_PROD_0000001722	DOJ_PROD_0000001785
SBA EIDL - Redline Auto Mechanics #2836978009	DOJ_PROD_0000001786	DOJ_PROD_0000001857
SBA EIDL - TM Events - #8154808102	DOJ_PROD_0000001858	DOJ_PROD_0000001930
SBA EIDL - Top Quality Contracting #7697997402	DOJ_PROD_0000001931	DOJ_PROD_0000002000
Selected Photographs from Digital Devices Seized Incident to Arrests of R. AYVAZYAN and TERABELIAN	DOJ_PROD_0000002001	DOJ_PROD_0000002056

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Criminal History Report: Richard Ayvazyan	DOJ_PROD_0000002135	DOJ_PROD_0000002193
Criminal History Report: Tamara Dadyan	DOJ_PROD_0000002194	DOJ_PROD_0000002294
Criminal History Report: Victoria Kauichko	DOJ_PROD_0000002295	DOJ_PROD_0000002329
Criminal History Report: Marietta Terabelian	DOJ_PROD_0000002330	DOJ_PROD_0000002338
CBP Reports - 10.19.2020 Secondary Inspection in Miami	DOJ_PROD_0000002339	DOJ_PROD_0000002358
SBA Loan #6714107903 - Time Line Transport	DOJ_PROD_0000002359	DOJ_PROD_0000002429
SBA App #16522057 - Top Quality Construction - [redacted]	DOJ_PROD_0000002430	DOJ_PROD_0000002439
SBA App #18941035 - Time Line Transport - [redacted]	DOJ_PROD_0000002440	DOJ_PROD_0000002449
SBA Loan #1092007202 - Top Quality Construction - [redacted]	DOJ_PROD_0000002450	DOJ_PROD_0000002457
SBA Loan #1764807406 - Time Line Transport - [redacted]	DOJ_PROD_0000002458	DOJ_PROD_0000002465
SBA Loan #3728857706 - Top Quality Contractors	DOJ_PROD_0000002466	DOJ_PROD_0000002473
SBA Loan #8311047304 - M[redacted] Z[redacted] dba Top Quality Construction - [redacted]	DOJ_PROD_0000002474	DOJ_PROD_0000002481
SBA Loan - [redacted] - Top Quality Contracting - SBA #1092007202	DOJ_PROD_0000002482	DOJ_PROD_0000002546
Search Warrant Application and Affidavit: 2-20-MJ-05282	DOJ_PROD_0000002552	DOJ_PROD_0000002640
Search Warrant Application and Affidavit: 2-20-MJ-05284	DOJ_PROD_0000002641	DOJ_PROD_0000002729
Search Warrant Application and Affidavit: 2-20-MJ-05285	DOJ_PROD_0000002730	DOJ_PROD_0000002818
Search Warrant Application and Affidavit: 2-20-MJ-05286	DOJ_PROD_0000002819	DOJ_PROD_0000002909
Search Warrant Application and Affidavit: 2-20-MJ-05288	DOJ_PROD_0000002910	DOJ_PROD_0000003000
Search Warrant Application and Affidavit: 2-20-MJ-05289	DOJ_PROD_0000003001	DOJ_PROD_0000003091

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Search Warrant Application and Affidavit: 2-20-MJ-05293	DOJ_PROD_0000003270	DOJ_PROD_0000003356
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Surveillance Photos - Richard Ayvazyan	DOJ_PROD_0000003664	DOJ_PROD_0000003673
Surveillance Photos - Trash Covers	DOJ_PROD_0000003674	DOJ_PROD_0000003752
Surveillance Garbage Pick Up 2020.10.22	DOJ_PROD_0000003753	DOJ_PROD_0000003771
2020.07.21 M[redacted] and B[redacted] Z[redacted] Interview Memo	DOJ_PROD_0000003772	DOJ_PROD_0000003773
2020.08.04 M[redacted] and B[redacted] Z[redacted] Interview Memo and Attachments	DOJ_PROD_0000003774	DOJ_PROD_0000003801
[redacted]: Arthur Ayvazyan and Allstate Towing	DOJ_PROD_0000003802	DOJ_PROD_0000003834