Peter Johnson (State Bar No. 252542)
Email: peter@peterjohnsonlaw.com
Law Office of Peter Johnson
409 N. Pacific Coast Hwy, 651
Redondo Beach, California 90027
Telephone: (310) 295-1785

Attorney for Defendant
VAHE DADYAN

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

UNITED STATES OF AMERICA, Plaintiff, v. VAHE DADYAN (Defendant #8) Defendant	Case No. 20-CR-579-SVW **DEFENDANT VAHE DADYAN' S JOINDER IN DEFENDANT R. AYVAZYAN'S RESPONSE TO GOVERNMENT'S *EX PARTE* APPLICATION FOR MODIFIED PROTECTIVE ORDER [DOC. # 219 AND 234] AND SUPPLMENTAL MEMORANDUM**

Defendant Vahe Dadyan, through his counsel, Peter Johnson, hereby joins in Defendant R. Ayvazyan's response to the Government's *Ex Parte* Application for Modified Protective Order [Doc. # 219 and 234] and offers the attach supplemental memorandum in support of the joinder.

DATED: March 31, 2021

Respectfully submitted,
By: _____/s/_____
PETER JOHNSON
Attorney for Defendant Vahe Dadyan

SUPPLEMENTAL MEORANDUM

I. Introduction

Because the government's proposed modified protective order is overbroad and unnecessary, Mr. Vahe Dadyan (Defendant #8) joins Defendant R. Ayvazyan's response to the government's *ex parte* application and offers the following in support of the joinder.

II. Relevant Facts

The First Superseding Indictment (FSI) in this case charges Mr. Dadyan with bank fraud, wire fraud, money laundering and conspiracy to commit bank fraud, wire fraud and money laundering. (Doc. #154). Mr. Dadyan is not charged in any of the aggravated identity theft counts. *Id.* Additionally, Mr. Dadyan was not named in the original complaint or indictment and, therefore, he was not a party to any of the previous litigation involving the existing protective order. (Doc #92).

By letter dated March 19, 2021, the government produced "Discovery Productions Volumes 1-15" to counsel for Mr. Dadyan. By letter dated March 26, 2021, the government produced "Discovery Production Volume 16" to counsel for Mr. Dadyan. Mr. Dadyan and his counsel have been in full compliance with the Court's Protective Order regarding discovery in this case. (Doc. #92).

Mr. Dadyan has no history of prior arrests, no criminal convictions, and he has been in full compliance with his release conditions.

III. Argument

The government's proposed modification to the protective order is overbroad and unnecessary. Its 29-page *ex parte* application is focused primarily on alleged violations of the protective order related to only two (2) of the eight (8) defendants. The complaints raised in the *ex parte* application regarding the alleged violations can be addressed under the Court's power to enforce the existing protective order. Nothing in the government's *ex parte* application provides a justification for expanding or modifying the protective order to include the other six defendants. Additionally, the proposed modification to the protective order will unnecessarily prejudice Mr. Dadyan by intruding upon his ability to efficiently prepare for the May 4, 2021 trial.

IV. Conclusion

For the above reasons, and the reasons discussed in Defendant R. Ayvazyan's response, the Court should deny the government's *ex parte* request to modify the protective order.

DATED: March 31, 2021

Respectfully submitted,

By: _____/s/_____
PETER JOHNSON
Attorneys for Defendant Vahe Dadyan