Ashwin J. Ram (SBN 227513)
aram@steptoe.com
Michael A. Keough (SBN 327037)
mkeough@steptoe.com
Nicholas P. Silverman (*pro hac vice*)
nsilverman@steptoe.com
STEPTOE & JOHNSON LLP
633 West Fifth Street, Suite 1900
Los Angeles, CA 90071
Telephone: (213) 439-9400
Facsimile: (213) 439-9599

Counsel for Defendant Richard Ayvazyan

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICHARD AYVAZYAN, *et al.*,

Defendants.

Case No. 20-cr-579 (SVW)

[PROPOSED] ORDER GRANTING MOTION TO DISMISS FOR PROSECUTORIAL MISCONDUCT

Judge: Hon. Stephen V. Wilson
Hearing Date: May 24, 2021
Time: 11:00 a.m.

[PROPOSED] ORDER

This Court, having considered the Motion to Dismiss for Prosecutorial Misconduct and Memorandum in Support, filed by Defendant Richard Ayvazyan, hereby GRANTS the application and ORDERS the following relief:

☐ The indictment and superseding indictment are dismissed with prejudice.

☐ The government is ordered to produce discovery regarding its internal decision-making about whether and how to charge different individuals within fourteen days.

☐ The government is ordered to produce all grand jury exhibits and transcripts within seven days.

☐ The government is ordered to produce all grand jury subpoenas within seven days.

☐ The government is ordered to identify all trial exhibits and witness testimony that could have been affected or shaped by tainted evidence or otherwise derived from tainted evidence within seven days.

IT IS SO ORDERED.

Dated: _____, 2021

_____
The Honorable Stephen V. Wilson
United States District Judge