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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)

DECLARATION OF ASHWIN J. RAM IN SUPPORT OF DEFENDANT RICHARD AYVAZYAN'S REPLY IN SUPPORT OF MOTION TO DISMISS FOR PROSECUTORIAL MISCONDUCT

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

I, Ashwin J. Ram, declare as follows:

1. I am an attorney licensed to practice law in the state of California. I am a partner at the law firm of Steptoe & Johnson LLP and counsel of record for defendant Richard Ayvazyan in the above-captioned matter.

2. A true and correct copy of the May 7, 2021 letter from counsel for Defendant Richard Ayvazyan to the government regarding the government's discovery obligations is attached as **Exhibit A**.

3. A true and correct copy of the May 7, 2021 letter from counsel for Defendant Richard Ayvazyan to the government seeking discovery on evidence tainted by coerced statements is attached as **Exhibit B**.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at Los Angeles, California on May 10, 2021.

Respectfully submitted,

/s/ Ashwin J. Ram
Ashwin J. Ram

Counsel for Defendant Richard Ayvazyan