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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 AND M. TERABELIAN'S MOTION FOR A *KASTIGAR* HEARING TO DISQUALIFY THE PROSECUTION TEAM, AND TO DISMISS [Doc. # 338]; SUPPLMENTAL MEMORANDUM**

Defendant Vahe Dadyan, through his counsel, Peter Johnson, hereby joins in Defendant R. Ayvazyan's and M. Terabelian's Motion for *Kastigar* Hearing to Disqualify the Prosecution Team and Dismiss the Case [Doc. # 338].

DATED: May 19, 2021

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

SUPPLEMENTAL MEORANDUM

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 was not named in the original complaint or indictment. [Doc.# 1 and Doc.#32]. Because the timing of the FSI alone gives rise to an inference that the prosecution team used tainted information to further its case against Mr. Dadyan, Mr. Dadyan joins in Defendant R. Ayvazyan's and M. Terabelian's Motion for *Kastigar* Hearing to Disqualify the Prosecution Team and Dismiss the Case. [Doc. # 338].

Mr. Dadyan also joins in co-defendant Grigoryan's joinder [Doc. #346] and respectfully requests that the Court order the following:

1) any person who possessed, reviewed, or discussed the tainted information at any time be required to testify and demonstrate that the taint did not affect their actions or decision-making process in any manner;

2) to ensure that the grand jury was completely unaffected by the evidence at issue, the government must produce all the grand jury transcripts to the defense in advance of the hearing; and

3) to ensure that its trial presentation will be completely unaffected by the

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evidence at issue, the government must disclose its trial exhibits in advance of the hearing.

DATED: May 19, 2021

Respectfully submitted,

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