DECLARATION OF CATHERINE AHN

I, Catherine Ahn, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I am one of the attorneys representing the government in this case. I make this declaration in support of the government's motion in limine #1 to exclude evidence and argument of alleged victim negligence and guarantees ("the motion").

2. On May 22, 2021, the government emailed counsel for all defendants requesting their position on whether they would seek to introduce evidence of victim negligence or third-party guarantees. On May 23, 2021, counsel for defendant Richard Ayvazyan declined to take a position as to whether it would seek to introduce evidence of victim negligence or guarantees, but also did not offer any grounds for seeking to introduce it. As of the date of this filing, counsel for the remaining defendants have not responded.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed at Los Angeles, California, on May 24, 2021.

CATHERINE AHN