DECLARATION OF CHRISTOPHER FENTON

I, Christopher Fenton, declare as follows:

1. I am a Trial Attorney with the Criminal Division, Fraud Section, of the United States Department of Justice. I am an attorney assigned to the case of United States v. Richard Ayvazyan et al., No. 20-CR-579(A)-SVW.

2. On May 20, 2021, the government provided written notice to defendants of its intention to introduce certain business records at trial under the self-authentication provision of Federal Rule of Evidence 902(11). The government provided a separate, additional notice on May 28, 2021, and on June 3, 2021, circulated a draft proposed stipulation that provided further additional notice and proposed a stipulation pertaining to certain of the categories of self-authenticating business records that the government intends to admit pursuant to the Rule.

3. Attached as **Exhibit A** is a true and correct copy of the custodian-of-records declarations for bank records that were produced to defendants in discovery, including:[1]

Producing Party	Exhibit
JP Morgan Chase	A-1
Comerica	A-2
Wells Fargo	A-3
Bank of America	A-4
US Bank	A-5
Capital One Bank	A-6

[1] Some of these productions also include loan files for which the government also seeks admission, however, these productions are predominantly comprised of bank records.

Bank of the West	A-7
First Republic	A-8

4. Attached as **Exhibit B** is a true and correct copy of the custodian-of-records declarations for loan files that were produced to defendants in discovery, including:[2]

Producing Party	Exhibit
WebBank	B-1
Celtic Bank	B-2
Cross River Bank	B-3
SBA	B-4
Seattle Bank	B-5
Newtek SBF	B-6
Customers Bank	B-7
Square Inc.	B-8
Fountainhead SBF	B-9
CDC SBF	B-10
TCF National Bank	B-11
Radius Bank	B-12

5. Attached as **Exhibit C** is a true and correct copy of the custodian-of-records declarations for escrow records that were produced to defendants in discovery, including:

Producing Party	Exhibit
Beverly Hills Escrow	C-1

[2] Some of these productions also include bank records for which the government also seeks admission, however, these productions are predominantly comprised of loan files.

CV Escrow	C-2
Encore Escrow	C-3
Perfect Escrow	C-4

6. Attached as **Exhibit D** is a true and correct copy of the custodian-of-records declarations for receipts and business records relating to the sale of goods and services, brokerage and cryptocurrency account records, and leasing records that were produced to defendants in discovery, including:

Producing Party	**Exhibit**
Belgium NY LLC	D-1
Coinbase	D-2
Fay Servicing	D-3
Abbott & Hast Mortuary	D-4
Italy 2000	D-5
Picadilly Jewelers	D-6
Robinhood	D-7
TD Ameritrade	D-8
The Point at WA	D-9

7. Attached as **Exhibit E** is a true and correct copy of the custodian-of-records declarations for telephone records that were produced to defendants in discovery, including:

Producing Party	**Exhibit**
AT&T	E-1
T-Mobile	E-2
Verizon	E-3

8. Attached as **Exhibit F** is a true and correct copy of the custodian-of-records declaration for Internet Protocol address records that were produced to defendants in discovery, including:

Producing Party	Exhibit
Charter Communications	F

9. Attached as **Exhibit G** is a true and correct copy of the custodian-of-records declaration for FDIC records that were produced to defendants in discovery, including:

Producing Party	Exhibit
FDIC	G

10. The government has followed up with counsel for the defendants on several occasions with respect to the admission of self-authenticating business records in an effort to find agreement on factual matters that the government believes should not be in genuine dispute and while counsel has not voiced specific objections, at least some counsel have been unwilling to enter into a formal stipulation as of the date of this filing.

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 June 9, 2021.



CHRISTOPHER FENTON