DECLARATION OF CATHERINE AHN

I, Catherine Ahn, declare and state as follows:

1. I am an Assistant United States Attorney for the Central District of California and am assigned to the prosecution of United States v. Ayvazyan, et. al, CR No. 20-579(A)-SVW.

2. I make this declaration in support of the government's ex parte application for permission to file a trial memorandum over 25 pages, as authorized in Central District of California Local Rule 11-6. In its trial memorandum, the government describes the factual and procedural history of the case, including previously filed and pending evidentiary motions and pre-trial motions. As of the time of this filing, there have been 474 docket entries in this case, including numerous motions to dismiss, to exclude, and suppress evidence. Furthermore, the charges in this case that the government must prove beyond a reasonable doubt at trial include thirty-three counts covering two alleged conspiracies, substantive wire and bank fraud offenses, aggravated identity theft charges, and offenses committed while on pre-trial release. As a result, the government's factual and procedural history, summary of the evidence, and summary of the evidentiary issues raised required additional length to describe. The government's trial memorandum is 37 pages.

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.

CATHERINE AHN