TRACY L. WILKISON
Acting United States Attorney
SCOTT M. GARRINGER
Assistant United States Attorney
Chief, Criminal Division
SCOTT PAETTY (Cal. Bar No. 274719)
CATHERINE AHN (Cal. Bar No. 248286)
BRIAN FAERSTEIN (Cal. Bar No. 274850)
Assistant United States Attorneys
Major Frauds/Environmental and Community Safety Crimes Sections
1100/1300 United States Courthouse
312 North Spring Street
Los Angeles, California 90012
Telephone: (213) 894-6527/2424/3819
Facsimile: (213) 894-6269/0141
E-mail: Scott.Paetty@usdoj.gov
Catherine.S.Ahn@usdoj.gov
Brian.Faerstein@usdoj.gov

DANIEL S. KAHN
Acting Chief, Fraud Section
Criminal Division, U.S. Department of Justice
CHRISTOPHER FENTON
Trial Attorney, Fraud Section
Criminal Division, U.S. Department of Justice
1400 New York Avenue NW, 3rd Floor
Washington, DC 20530
Telephone: (202) 320-0539
Facsimile: (202) 514-0152
E-mail: Christopher.Fenton@usdoj.gov

Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

RICHARD AYVAZYAN,
aka "Richard Avazian" and "Iuliia Zhadko,"
MARIETTA TERABELIAN,
aka "Marietta Abelian" and "Viktoria Kauichko,"
ARTUR AYVAZYAN,
aka "Arthur Ayvazyan," and
TAMARA DADYAN,
MANUK GRIGORYAN,
aka "Mike Grigoryan," and "Anton Kudiumov,"
ARMAN HAYRAPETYAN,
EDVARD PARONYAN,
aka "Edvard Paronian" and "Edward Paronyan," and
VAHE DADYAN,

No. CR 20-579(A)-SVW

GOVERNMENT'S NOTICE

Hearing Date: June 14, 2021
Hearing Time: 1:30 p.m.
Trial Date: June 15, 2021
Location: Courtroom of the Hon. Stephen V. Wilson

Defendants.

Plaintiff United States of America, by and through its counsel of record, the Acting United States Attorney for the Central District of California, Assistant United States Attorneys Scott Paetty, Catherine S. Ahn, and Brian Faerstein, and Department of Justice Trial Attorney Christopher Fenton, hereby files the attached notice to inform the Court about an inadvertent factual error in the government's reply in support of its motion in limine #4 to admit business records under the self-authentication provision of Federal Rule of Criminal Procedure 902(11).

Dated: June 13, 2021

Respectfully submitted,

TRACY L. WILKISON
Acting United States Attorney

SCOTT M. GARRINGER
Assistant United States Attorney
Chief, Criminal Division

/s/
SCOTT PAETTY
CATHERINE AHN
BRIAN FAERSTEIN
Assistant United States Attorneys
CHRISTOPHER FENTON
Department of Justice Trial Attorney

Attorneys for Plaintiff
UNITED STATES OF AMERICA

NOTICE

In its reply in support of its motion in limine #4 ("MIL #4"), filed earlier today (ECF 516), the government mistakenly identified a JPMorgan Chase bank account as being an account held at Radius Bank.

Specifically, in its reply, the government described a text message exchange "Iuliia Zhadko" had with a representative from Radius Bank. (ECF 516 at 13-14.) Following the description of this text message exchange, the government quoted a prior court filing submitted by defendant Richard Ayvazyan, in which defendant described a separate bank account held by a company controlled by "Iuliia Zhadko" used to purchase merchandise from Lamps Plus. (Id. at 14 (quoting ECF 417 at 3).) In quoting from defendant's prior filing, the government added the bracketed language "[Radius Bank]" to specify a bank account, as follows: "Page 3 of this [Radius Bank] bank account statement . . . ." (Id.) Defendant's initial filing did not include a specification as to which bank the account belonged. In adding the modifier "[Radius Bank"], the government inadvertently and incorrectly identified the relevant bank as Radius Bank instead of JPMorgan Chase. The government did not intend to mislead the Court or misrepresent the facts in any way.

The government learned of this inadvertent error upon defendants Richard Ayvazyan's and Marietta Terabelian's filing of a joint application to file a sur-reply in connection with the government's MIL #4. (ECF 518.) Defendants withdrew their joint application in light of the Court's order that preceded it, and the government submits that the mistaken bank identification as described above does not materially impact any of the points the government made in its reply. Nonetheless, the government files this notice to acknowledge

its inadvertent error and correct the factual record in advance of the Court's rulings on certain double hearsay objections during trial. (ECF 517.)