

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

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,

Defendants.

CR 2:20-579(A)-SVW

GOVERNMENT'S PROPOSED FORFEITURE
SPECIAL VERDICT FORMS

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,

1 Catherine Ahn, Brian Faerstein, Dan Boyle, and Department of Justice
2 Trial Attorney Christopher Fenton, hereby submits the government's
3 proposed verdict form with respect to defendants Richard Ayvazyan,
4 Marietta Terabelian, Artur Ayvazyan, and Vahe Dadyan.

5
6
7 Dated: June 27, 2021

Respectfully submitted,

8 TRACY L. WILKISON
9 Acting United States Attorney

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

12 /s/
13 DAN G. BOYLE

14 CATHERINE AHN
15 SCOTT PAETTY
16 BRIAN FAERSTEIN
Assistant United States Attorneys
17 CHRISTOPHER FENTON
Department of Justice Trial Attorney

18 Attorneys for Plaintiff
19 UNITED STATES OF AMERICA
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UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICHARD AYVAZIAN,
MARIETTA TERABELIAN,
ARTUR AYVAZIAN,
TAMARA DADYAN,
MANUK GRIGORYAN,
ARMAN HAYRAPETYAN,
EDVARD PARONYAN,
VAHE DADYAN,

Defendants.

CR 2:20-579(A)-SVW

FORFEITURE SPECIAL VERDICT FORM=
FOR DEFENDANT RICHARD AYVAZIAN

1 We, the jury in the above-captioned case, present the following
2 unanimous verdict as to defendant RICHARD AYVAZYAN:

3
4 **COUNT ONE**

5 Following the guilty verdict against Defendant RICHARD AYVAZYAN
6 on Count 1 of the First Superseding Indictment ("FSI"), the
7 government seeks forfeiture of the following property:

8
9 All of the convicted defendant's right, title and interest
10 in certain real property located in Tarzana, California
11 identified by Assessors Parcel Number 2176-029-031

12 1. Do you unanimously find by the preponderance of the
13 evidence that this property is subject to forfeiture
14 because it constitutes, or is derived from, proceeds
15 obtained directly or indirectly as a result of the offense
16 committed in Count 1?

17 YES ☐ NO ☐

18 **Please proceed to Question 2.**

19
20 All of the convicted defendant's right, title and interest
21 in certain real property located in Glendale, California
22 identified by Assessors Parcel Number 5663-036-033

23 2. Do you unanimously find by the preponderance of the
24 evidence that this property is subject to forfeiture
25 because it constitutes, or is derived from, proceeds
26 obtained directly or indirectly as a result of the offense
27 committed in Count 1?

28 YES ☐ NO ☐

1 **Please proceed to Question 3.**

2
3 All of the convicted defendant's right, title and interest
4 in certain real property located in Palm Desert, California
5 identified by Assessors Parcel Number 694-331-008

6 3. Do you unanimously find by the preponderance of the
7 evidence that this property is subject to forfeiture
8 because it constitutes, or is derived from, proceeds
9 obtained directly or indirectly as a result of the offense
10 committed in Count 1?

11 YES ☐ NO ☐

12 **Please proceed to Question 4.**

13
14 \$74,557.79 in bank funds seized from Bank of America
15 account number ending in 7695 held in the name of Allstate
16 Towing & Transport LLC

17 4. Do you unanimously find by the preponderance of the
18 evidence that this property is subject to forfeiture
19 because it constitutes, or is derived from, proceeds
20 obtained directly or indirectly as a result of the offense
21 committed in Count 1?

22 YES ☐ NO ☐

23 **Please proceed to Question 5.**

24
25 \$65,990.43 in bank funds seized from Bank of America
26 account ending in '9700 in the name of Runyan Tax Service
27 Inc.

28 5. Do you unanimously find by the preponderance of the

evidence that this property is subject to forfeiture because it constitutes, or is derived from, proceeds obtained directly or indirectly as a result of the offense committed in Count 1?

YES ☐ NO ☐

Please proceed to Question 6.

\$451,185.00 in U.S. Currency seized on November 5, 2020, in various areas and backyard of a Tarzana, California residence

6. Do you unanimously find by the preponderance of the evidence that this property is subject to forfeiture because it constitutes, or is derived from, proceeds obtained directly or indirectly as a result of the offense committed in Count 1?

YES ☐ NO ☐

Please proceed to Question 7.

\$3,422.00 in U.S. Currency seized on November 20, 2020, from Richard Ayvazyan and Marietta Terabelian at Miami International Airport

7. Do you unanimously find by the preponderance of the evidence that this property is subject to forfeiture because it constitutes, or is derived from, proceeds obtained directly or indirectly as a result of the offense committed in Count 1?

YES ☐ NO ☐

Please proceed to Question 8.

1 One Audermars Piguet, Royal Oak 18 carat rose gold wrist
2 watch, model 26331, serial number J52335

3 8. Do you unanimously find by the preponderance of the
4 evidence that this property is subject to forfeiture
5 because it constitutes, or is derived from, proceeds
6 obtained directly or indirectly as a result of the offense
7 committed in Count 1?

8 YES ☐ NO ☐

9 **Please proceed to Question 9.**

10
11 One Rolex Datejust stainless steel wrist watch, model
12 126334, serial number 4U95Z313

13 9. Do you unanimously find by the preponderance of the
14 evidence that this property is subject to forfeiture
15 because it constitutes, or is derived from, proceeds
16 obtained directly or indirectly as a result of the offense
17 committed in Count 1?

18 YES ☐ NO ☐

19 **Please proceed to Question 10.**

20
21 One Audemars Piguet, Royal Oak Offshore black ceramic wrist
22 watch, serial number K23313

23 10. Do you unanimously find by the preponderance of the
24 evidence that this property is subject to forfeiture
25 because it constitutes, or is derived from, proceeds
26 obtained directly or indirectly as a result of the offense
27 committed in Count 1?

28 YES ☐ NO ☐

1 **Please proceed to Question 11.**

2
3 One Audemars Piguet Royal Oak Offshore black ceramic wrist
4 watch, serial number LU44845K

5 11. Do you unanimously find by the preponderance of the
6 evidence that this property is subject to forfeiture
7 because it constitutes, or is derived from, proceeds
8 obtained directly or indirectly as a result of the offense
9 committed in Count 1?

10 YES ☐ NO ☐

11 **Please proceed to Question 12.**

12
13 One Audemars Piguet Royal Oak stainless steel wrist watch,
14 serial number LW3397N

15 12. Do you unanimously find by the preponderance of the
16 evidence that this property is subject to forfeiture
17 because it constitutes, or is derived from, proceeds
18 obtained directly or indirectly as a result of the offense
19 committed in Count 1?

20 YES ☐ NO ☐

21 **Please proceed to Question 13.**

22
23 One Rolex Day-Date watch, serial number W44P7238

24 13. Do you unanimously find by the preponderance of the
25 evidence that this property is subject to forfeiture
26 because it constitutes, or is derived from, proceeds
27 obtained directly or indirectly as a result of the offense
28 committed in Count 1?

YES ☐ NO ☐

Please proceed to Question 14.

Sixty Gold Bullion Coins

14. Do you unanimously find by the preponderance of the evidence that this property is subject to forfeiture because it constitutes, or is derived from, proceeds obtained directly or indirectly as a result of the offense committed in Count 1?

YES ☐ NO ☐

Please proceed to Question 15.

One 14 carat yellow gold 24" neck chain

15. Do you unanimously find by the preponderance of the evidence that this property is subject to forfeiture because it constitutes, or is derived from, proceeds obtained directly or indirectly as a result of the offense committed in Count 1?

YES ☐ NO ☐

Please proceed to Question 16.

One Pair of 14 carat white gold earrings with diamond studs

16. Do you unanimously find by the preponderance of the evidence that this property is subject to forfeiture because it constitutes, or is derived from, proceeds obtained directly or indirectly as a result of the offense committed in Count 1?

YES ☐ NO ☐

1 **Please proceed to Question 17.**

2
3 **COUNTS TWO THROUGH TWELVE, TWENTY-TWO, and TWENTY-FOUR**

4 Following the guilty verdict against Defendant RICHARD AYVAZYAN
5 on Counts 2-12, 22, and 24 of the FSI, the government seeks
6 forfeiture of the following property:

7 All of the convicted defendant's right, title and interest
8 in certain real property located in Tarzana, California
9 identified by Assessors Parcel Number 2176-029-031

10 17. Do you unanimously find by the preponderance of the
11 evidence that this property is subject to forfeiture
12 because it constitutes, or is derived from, proceeds
13 obtained directly or indirectly as a result of the offenses
14 committed in Counts 2-12, 22, and 24?

15 YES ☐ NO ☐

16 **Please proceed to Question 18.**

17
18 All of the convicted defendant's right, title and interest
19 in certain real property located in Glendale, California
20 identified by Assessors Parcel Number 5663-036-033

21 18. Do you unanimously find by the preponderance of the
22 evidence that this property is subject to forfeiture
23 because it constitutes, or is derived from, proceeds
24 obtained directly or indirectly as a result of the offenses
25 committed in Counts 2-12, 22, and 24?

26 YES ☐ NO ☐

27 **Please proceed to Question 19.**

1 All of the convicted defendant's right, title and interest
2 in certain real property located in Palm Desert, California
3 identified by Assessors Parcel Number 694-331-008

4 19. Do you unanimously find by the preponderance of the
5 evidence that this property is subject to forfeiture
6 because it constitutes, or is derived from, proceeds
7 obtained directly or indirectly as a result of the offenses
8 committed in Counts 2-12, 22, and 24?

9 YES ☐ NO ☐

10 **Please proceed to Question 20.**

11
12 \$74,557.79 in bank funds seized from Bank of America
13 account number ending in 7695 held in the name of Allstate
14 Towing & Transport LLC

15 20. Do you unanimously find by the preponderance of the
16 evidence that this property is subject to forfeiture
17 because it constitutes, or is derived from, proceeds
18 obtained directly or indirectly as a result of the offenses
19 committed in Counts 2-12, 22, and 24?

20 YES ☐ NO ☐

21 **Please proceed to Question 21.**

22
23 \$65,990.43 in bank funds seized from Bank of America
24 account ending in '9700 in the name of Runyan Tax Service
25 Inc.

26 21. Do you unanimously find by the preponderance of the
27 evidence that this property is subject to forfeiture
28 because it constitutes, or is derived from, proceeds

1 obtained directly or indirectly as a result of the offenses
2 committed in Counts 2-12, 22, and 24?

3 YES ☐ NO ☐

4 **Please proceed to Question 22.**

5
6 \$451,185.00 in U.S. Currency seized on November 5, 2020, in
7 various areas and backyard of a Tarzana, California
8 residence

9 22. Do you unanimously find by the preponderance of the
10 evidence that this property is subject to forfeiture
11 because it constitutes, or is derived from, proceeds
12 obtained directly or indirectly as a result of the offenses
13 committed in Counts 2-12, 22, and 24?

14 YES ☐ NO ☐

15 **Please proceed to Question 23.**

16
17 \$3,422.00.00 in U.S. Currency seized on November 20, 2020,
18 from Richard Ayvazyan and Marietta Terabelian at the Miami
19 International Airport

20 23. Do you unanimously find by the preponderance of the
21 evidence that this property is subject to forfeiture
22 because it constitutes, or is derived from, proceeds
23 obtained directly or indirectly as a result of the offenses
24 committed in Counts 2-12, 22, and 24?

25 YES ☐ NO ☐

26 **Please proceed to Question 24.**

1 One Audermars Piguet, Royal Oak 18 carat rose gold wrist
2 watch, model 26331, serial number J52335

3 24. Do you unanimously find by the preponderance of the
4 evidence that this property is subject to forfeiture
5 because it constitutes, or is derived from, proceeds
6 obtained directly or indirectly as a result of the offenses
7 committed in Counts 2-12, 22, and 24?

8 YES ☐ NO ☐

9 **Please proceed to Question 25.**

10
11 One Rolex Datejust stainless steel wrist watch, model
12 126334, serial number 4U95Z313

13 25. Do you unanimously find by the preponderance of the
14 evidence that this property is subject to forfeiture
15 because it constitutes, or is derived from, proceeds
16 obtained directly or indirectly as a result of the offenses
17 committed in Counts 2-12, 22, and 24?

18 YES ☐ NO ☐

19 **Please proceed to Question 26.**

20
21 One Audemars Piguet, Royal Oak Offshore black ceramic wrist
22 watch, serial number K23313

23 26. Do you unanimously find by the preponderance of the
24 evidence that this property is subject to forfeiture
25 because it constitutes, or is derived from, proceeds
26 obtained directly or indirectly as a result of the offenses
27 committed in Counts 2-12, 22, and 24?

28 YES ☐ NO ☐

1 **Please proceed to Question 27.**

2
3 One Audemars Piguet Royal Oak Offshore black ceramic wrist
4 watch, serial number LU44845K

5 27. Do you unanimously find by the preponderance of the
6 evidence that this property is subject to forfeiture
7 because it constitutes, or is derived from, proceeds
8 obtained directly or indirectly as a result of the offenses
9 committed in Counts 2-12, 22, and 24?

10 YES ☐ NO ☐

11 **Please proceed to Question 28.**

12
13 One Audemars Piguet Royal Oak stainless steel wrist watch,
14 serial number LW3397N

15 28. Do you unanimously find by the preponderance of the
16 evidence that this property is subject to forfeiture
17 because it constitutes, or is derived from, proceeds
18 obtained directly or indirectly as a result of the offenses
19 committed in Counts 2-12, 22, and 24?

20 YES ☐ NO ☐

21 **Please proceed to Question 29.**

22
23 One Rolex Day-Date watch, serial number W44P7238

24 29. Do you unanimously find by the preponderance of the
25 evidence that this property is subject to forfeiture
26 because it constitutes, or is derived from, proceeds
27 obtained directly or indirectly as a result of the offenses
28 committed in Counts 2-12, 22, and 24?

YES ☐ NO ☐

Please proceed to Question 30.

Sixty Gold Bullion Coins

30. Do you unanimously find by the preponderance of the evidence that this property is subject to forfeiture because it constitutes, or is derived from, proceeds obtained directly or indirectly as a result of the offenses committed in Counts 2-12, 22, and 24?

YES ☐ NO ☐

Please proceed to Question 31.

One 14 carat yellow gold 24" neck chain

31. Do you unanimously find by the preponderance of the evidence that this property is subject to forfeiture because it constitutes, or is derived from, proceeds obtained directly or indirectly as a result of the offenses committed in Counts 2-12, 22, and 24?

YES ☐ NO ☐

Please proceed to Question 32.

One Pair of 14 carat white gold earrings with diamond studs

32. Do you unanimously find by the preponderance of the evidence that this property is subject to forfeiture because it constitutes, or is derived from, proceeds obtained directly or indirectly as a result of the offenses committed in Counts 2-12, 22, and 24?

YES ☐ NO ☐

1 **Please proceed to Question 33.**

2
3 **COUNTS THIRTEEN THROUGH TWENTY-ONE**

4 Following the guilty verdict against Defendant RICHARD AYVAZYAN
5 on Counts 13-21 of the FSI, the government seeks forfeiture of the
6 following property:

7
8 All of the convicted defendant's right, title and interest
9 in certain real property located in Tarzana, California
10 identified by Assessors Parcel Number 2176-029-031

11 33. Do you unanimously find by the preponderance of the
12 evidence that this property is subject to forfeiture
13 because it constitutes, or is derived from, proceeds
14 obtained directly or indirectly as a result of the offenses
15 committed in Counts 13-21?

16 YES ☐ NO ☐

17 **Please proceed to Question 34.**

18
19 All of the convicted defendant's right, title and interest
20 in certain real property located in Glendale, California
21 identified by Assessors Parcel Number 5663-036-033

22 34. Do you unanimously find by the preponderance of the
23 evidence that this property is subject to forfeiture
24 because it constitutes, or is derived from, proceeds
25 obtained directly or indirectly as a result of the offenses
26 committed in Counts 13-21?

27 YES ☐ NO ☐

28 **Please proceed to Question 35.**

1
2 All of the convicted defendant's right, title and interest
3 in certain real property located in Palm Desert, California
4 identified by Assessors Parcel Number 694-331-008

5 35. Do you unanimously find by the preponderance of the
6 evidence that this property is subject to forfeiture
7 because it constitutes, or is derived from, proceeds
8 obtained directly or indirectly as a result of the offenses
9 committed in Counts 13-21?

10 YES ☐ NO ☐

11 **Please proceed to Question 36.**

12
13 \$74,557.79 in bank funds seized from Bank of America
14 account number ending in 7695 held in the name of Allstate
15 Towing & Transport LLC

16 36. Do you unanimously find by the preponderance of the
17 evidence that this property is subject to forfeiture
18 because it constitutes, or is derived from, proceeds
19 obtained directly or indirectly as a result of the offenses
20 committed in Counts 13-21?

21 YES ☐ NO ☐

22 **Please proceed to Question 37.**

23
24 \$65,990.43 in bank funds seized from Bank of America
25 account ending in '9700 in the name of Runyan Tax Service
26 Inc.

27 37. Do you unanimously find by the preponderance of the
28 evidence that this property is subject to forfeiture

1 because it constitutes, or is derived from, proceeds
2 obtained directly or indirectly as a result of the offenses
3 committed in Counts 13-21?

4 YES ☐ NO ☐

5 **Please proceed to Question 38.**

6
7 \$451,185.00 in U.S. Currency seized on November 5, 2020, in
8 various areas and backyard of a Tarzana, California
9 residence

10 38. Do you unanimously find by the preponderance of the
11 evidence that this property is subject to forfeiture
12 because it constitutes, or is derived from, proceeds
13 obtained directly or indirectly as a result of the offenses
14 committed in Counts 13-21?

15 YES ☐ NO ☐

16 **Please proceed to Question 39.**

17
18 \$3,422.00.00 in U.S. Currency seized on November 20, 2020,
19 from Richard Ayvazyan and Marietta Terabelian at the Miami
20 International Airport

21 39. Do you unanimously find by the preponderance of the
22 evidence that this property is subject to forfeiture
23 because it constitutes, or is derived from, proceeds
24 obtained directly or indirectly as a result of the offenses
25 committed in Counts 13-21?

26 YES ☐ NO ☐

27 **Please proceed to Question 40.**

1 One Audermars Piguet, Royal Oak 18 carat rose gold wrist
2 watch, model 26331, serial number J52335

3 40. Do you unanimously find by the preponderance of the
4 evidence that this property is subject to forfeiture
5 because it constitutes, or is derived from, proceeds
6 obtained directly or indirectly as a result of the offenses
7 committed in Counts 13-21?

8 YES ☐ NO ☐

9 **Please proceed to Question 41.**

10
11 One Rolex Datejust stainless steel wrist watch, model
12 126334, serial number 4U95Z313

13 41. Do you unanimously find by the preponderance of the
14 evidence that this property is subject to forfeiture
15 because it constitutes, or is derived from, proceeds
16 obtained directly or indirectly as a result of the offenses
17 committed in Counts 13-21?

18 YES ☐ NO ☐

19 **Please proceed to Question 42.**

20
21 One Audemars Piguet, Royal Oak Offshore black ceramic wrist
22 watch, serial number K23313

23 42. Do you unanimously find by the preponderance of the
24 evidence that this property is subject to forfeiture
25 because it constitutes, or is derived from, proceeds
26 obtained directly or indirectly as a result of the offenses
27 committed in Counts 13-21?

28 YES ☐ NO ☐

1 **Please proceed to Question 43.**

2
3 One Audemars Piguet Royal Oak Offshore black ceramic wrist
4 watch, serial number LU44845K

5 43. Do you unanimously find by the preponderance of the
6 evidence that this property is subject to forfeiture
7 because it constitutes, or is derived from, proceeds
8 obtained directly or indirectly as a result of the offenses
9 committed in Counts 13-21?

10 YES ☐ NO ☐

11 **Please proceed to Question 44.**

12
13 One Audemars Piguet Royal Oak stainless steel wrist watch,
14 serial number LW3397N

15 44. Do you unanimously find by the preponderance of the
16 evidence that this property is subject to forfeiture
17 because it constitutes, or is derived from, proceeds
18 obtained directly or indirectly as a result of the offenses
19 committed in Counts 13-21?

20 YES ☐ NO ☐

21 **Please proceed to Question 45.**

22
23 One Rolex Day-Date watch, serial number W44P7238

24 45. Do you unanimously find by the preponderance of the
25 evidence that this property is subject to forfeiture
26 because it constitutes, or is derived from, proceeds
27 obtained directly or indirectly as a result of the offenses
28 committed in Counts 13-21?

YES ☐ NO ☐

Please proceed to Question 46.

Sixty Gold Bullion Coins

46. Do you unanimously find by the preponderance of the evidence that this property is subject to forfeiture because it constitutes, or is derived from, proceeds obtained directly or indirectly as a result of the offenses committed in Counts 13-21?

YES ☐ NO ☐

Please proceed to Question 47.

One 14 carat yellow gold 24" neck chain

47. Do you unanimously find by the preponderance of the evidence that this property is subject to forfeiture because it constitutes, or is derived from, proceeds obtained directly or indirectly as a result of the offenses committed in Counts 13-21?

YES ☐ NO ☐

Please proceed to Question 48.

One Pair of 14 carat white gold earrings with diamond studs

48. Do you unanimously find by the preponderance of the evidence that this property is subject to forfeiture because it constitutes, or is derived from, proceeds obtained directly or indirectly as a result of the offenses committed in Counts 13-21?

YES ☐ NO ☐

1 **Please proceed to Question 49.**

2
3 **COUNT TWENTY-SIX**

4 Following the guilty verdict against Defendant RICHARD AYVAZYAN
5 on Count 26 of the FSI, the government seeks forfeiture of the
6 following property:

7 All of the convicted defendant's right, title and interest
8 in certain real property located in Tarzana, California
9 identified by Assessors Parcel Number 2176-029-031

10 49. Do you unanimously find by a preponderance of the evidence
11 that this property is subject to forfeiture because it is
12 property involved in the offense committed in Count 26?

13 YES ☐ NO ☐

14 **Please proceed to Question 50.**

15
16 All of the convicted defendant's right, title and interest
17 in certain real property located in Glendale, California
18 identified by Assessors Parcel Number 5663-036-033

19 50. Do you unanimously find by a preponderance of the evidence
20 that this property is subject to forfeiture because it is
21 property involved in the offense committed in Count 26?

22 YES ☐ NO ☐

23 **Please proceed to Question 51.**

24
25 All of the convicted defendant's right, title and interest
26 in certain real property located in Palm Desert, California
27 identified by Assessors Parcel Number 694-331-008

28 51. Do you unanimously find by a preponderance of the evidence

1 that this property is subject to forfeiture because it is
2 property involved in the offense committed in Count 26?

3 YES ☐ NO ☐

4 **Please proceed to Question 52.**

5
6 \$74,557.79 in bank funds seized from Bank of America
7 account number ending in 7695 held in the name of Allstate
8 Towing & Transport LLC

9 52. Do you unanimously find by a preponderance of the evidence
10 that this property is subject to forfeiture because it is
11 property involved in the offense committed in Count 26?

12 YES ☐ NO ☐

13 **Please proceed to Question 53.**

14
15 \$65,990.43 in bank funds seized from Bank of America
16 account ending in '9700 in the name of Runyan Tax Service
17 Inc.

18 53. Do you unanimously find by a preponderance of the evidence
19 that this property is subject to forfeiture because it is
20 property involved in the offense committed in Count 26?

21 YES ☐ NO ☐

22 **Please proceed to Question 54.**

23
24 \$451,185.00 in U.S. Currency seized on November 5, 2020, in
25 various areas and backyard of a Tarzana, California
26 residence

27 54. Do you unanimously find by a preponderance of the evidence
28 that this property is subject to forfeiture because it is

property involved in the offense committed in Count 26?

YES ☐ NO ☐

Please proceed to Question 55.

\$3,422.00.00 in U.S. Currency seized on November 20, 2020,
from Richard Ayvazyan and Marietta Terabelian at the Miami
International Airport

55. Do you unanimously find by a preponderance of the evidence
that this property is subject to forfeiture because it is
property involved in the offense committed in Count 26?

YES ☐ NO ☐

Please proceed to Question 56.

One Audermars Piguet, Royal Oak 18 carat rose gold wrist
watch, model 26331, serial number J52335

56. Do you unanimously find by a preponderance of the evidence
that this property is subject to forfeiture because it is
property involved in the offense committed in Count 26?

YES ☐ NO ☐

Please proceed to Question 57

One Rolex Datejust stainless steel wrist watch, model
126334, serial number 4U95Z313

57. Do you unanimously find by a preponderance of the evidence
that this property is subject to forfeiture because it is
property involved in the offense committed in Count 26?

YES ☐ NO ☐

Please proceed to Question 58.

One Audemars Piguet, Royal Oak Offshore black ceramic wrist
watch, serial number K23313

58. Do you unanimously find by a preponderance of the evidence
that this property is subject to forfeiture because it is
property involved in the offense committed in Count 26?

YES ☐ NO ☐

Please proceed to Question 59.

One Audemars Piguet Royal Oak Offshore black ceramic wrist
watch, serial number LU44845K

59. Do you unanimously find by a preponderance of the evidence
that this property is subject to forfeiture because it is
property involved in the offense committed in Count 26?

YES ☐ NO ☐

Please proceed to Question 60.

One Audemars Piguet Royal Oak stainless steel wrist watch,
serial number LW3397N

60. Do you unanimously find by a preponderance of the evidence
that this property is subject to forfeiture because it is
property involved in the offense committed in Count 26?

YES ☐ NO ☐

Please proceed to Question 61.

One Rolex Day-Date watch, serial number W44P7238

61. Do you unanimously find by a preponderance of the evidence
that this property is subject to forfeiture because it is

property involved in the offense committed in Count 26?

YES ☐ NO ☐

Please proceed to Question 62.

Sixty Gold Bullion Coins

62. Do you unanimously find by a preponderance of the evidence that this property is subject to forfeiture because it is property involved in the offense committed in Count 26?

YES ☐ NO ☐

Please proceed to Question 63.

One 14 carat yellow gold 24" neck chain

63. Do you unanimously find by a preponderance of the evidence that this property is subject to forfeiture because it is property involved in the offense committed in Count 26?

YES ☐ NO ☐

Please proceed to Question 64.

One Pair of 14 carat white gold earrings with diamond studs

64. Do you unanimously find by a preponderance of the evidence that this property is subject to forfeiture because it is property involved in the offense committed in Count 26?

YES ☐ NO ☐

DATED

FOREPERSON

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UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICHARD AYVAZIAN,
MARIETTA TERABELIAN,
ARTUR AYVAZIAN,
TAMARA DADYAN,
MANUK GRIGORYAN,
ARMAN HAYRAPETYAN,
EDVARD PARONYAN,
VAHE DADYAN,

Defendants.

CR 2:20-579(A)-SVW

FORFEITURE SPECIAL VERDICT FORM=
FOR DEFENDANT ARTUR AYVAZIAN

1 We, the jury in the above-captioned case, present the following
2 unanimous verdict as to defendant ARTUR AYVAZYAN:

3 **COUNT ONE**

4 Following the guilty verdict against Defendant ARTUR AYVAZYAN on
5 Count 1 of the First Superseding Indictment ("FSI"), the government
6 seeks forfeiture of the following property:

7 All of the convicted defendant's right, title and interest
8 in certain real property located in Tarzana, California
9 identified by Assessors Parcel Number 2176-029-031

10 1. Do you unanimously find by the preponderance of the
11 evidence that this property is subject to forfeiture
12 because it constitutes, or is derived from, proceeds
13 obtained directly or indirectly as a result of the offense
14 committed in Count 1?

15 YES ☐ NO ☐

16 **Please proceed to Question 2.**

17
18 All of the convicted defendant's right, title and interest
19 in certain real property located in Glendale, California
20 identified by Assessors Parcel Number 5663-036-033

21 2. Do you unanimously find by the preponderance of the
22 evidence that this property is subject to forfeiture
23 because it constitutes, or is derived from, proceeds
24 obtained directly or indirectly as a result of the offense
25 committed in Count 1?

26 YES ☐ NO ☐

27 **Please proceed to Question 3.**

1 All of the convicted defendant's right, title and interest
2 in certain real property located in Palm Desert, California
3 identified by Assessors Parcel Number 694-331-008

4 3. Do you unanimously find by the preponderance of the
5 evidence that this property is subject to forfeiture
6 because it constitutes, or is derived from, proceeds
7 obtained directly or indirectly as a result of the offense
8 committed in Count 1?

9 YES ☐ NO ☐

10 **Please proceed to Question 4.**

11
12 \$74,557.79 in bank funds seized from Bank of America
13 account number ending in 7695 held in the name of Allstate
14 Towing & Transport LLC

15 4. Do you unanimously find by the preponderance of the
16 evidence that this property is subject to forfeiture
17 because it constitutes, or is derived from, proceeds
18 obtained directly or indirectly as a result of the offense
19 committed in Count 1?

20 YES ☐ NO ☐

21 **Please proceed to Question 5.**

22
23 \$65,990.43 in bank funds seized from Bank of America
24 account ending in '9700 in the name of Runyan Tax Service
25 Inc.

26 5. Do you unanimously find by the preponderance of the
27 evidence that this property is subject to forfeiture
28 because it constitutes, or is derived from, proceeds

obtained directly or indirectly as a result of the offense committed in Count 1?

YES ☐ NO ☐

Please proceed to Question 6.

\$12,520.00 in U.S. Currency seized on November 5, 2020, in Encino, California, at the residence of defendant Artur Ayvazyan and Tamara Dadyan

6. Do you unanimously find by the preponderance of the evidence that this property is subject to forfeiture because it constitutes, or is derived from, proceeds obtained directly or indirectly as a result of the offense committed in Count 1?

YES ☐ NO ☐

Please proceed to Question 7.

COUNTS TWO THROUGH TWELVE and TWENTY-FOUR

Following the guilty verdict against Defendant ARTUR AYVAZYAN on Counts 2-12 and 24 of the FSI, the government seeks forfeiture of the following property:

All of the convicted defendant's right, title and interest in certain real property located in Tarzana, California identified by Assessors Parcel Number 2176-029-031

7. Do you unanimously find by the preponderance of the evidence that this property is subject to forfeiture because it constitutes, or is derived from, proceeds obtained directly or indirectly as a result of the offenses committed in Counts 2-12 and 24?

YES ☐ NO ☐

Please proceed to Question 8.

All of the convicted defendant's right, title and interest in certain real property located in Glendale, California identified by Assessors Parcel Number 5663-036-033

8. Do you unanimously find by the preponderance of the evidence that this property is subject to forfeiture because it constitutes, or is derived from, proceeds obtained directly or indirectly as a result of the offenses committed in Counts 2-12 and 22?

YES ☐ NO ☐

Please proceed to Question 9.

All of the convicted defendant's right, title and interest in certain real property located in Palm Desert, California identified by Assessors Parcel Number 694-331-008

9. Do you unanimously find by the preponderance of the evidence that this property is subject to forfeiture because it constitutes, or is derived from, proceeds obtained directly or indirectly as a result of the offenses committed in Counts 2-12 and 22?

YES ☐ NO ☐

Please proceed to Question 10.

\$74,557.79 in bank funds seized from Bank of America account number ending in 7695 held in the name of Allstate Towing & Transport LLC

1 10. Do you unanimously find by the preponderance of the
2 evidence that this property is subject to forfeiture
3 because it constitutes, or is derived from, proceeds
4 obtained directly or indirectly as a result of the offenses
5 committed in Counts 2-12 and 22?

6 YES ☐ NO ☐

7 **Please proceed to Question 11.**

8
9 \$65,990.43 in bank funds seized from Bank of America
10 account ending in '9700 in the name of Runyan Tax Service
11 Inc.

12 11. Do you unanimously find by the preponderance of the
13 evidence that this property is subject to forfeiture
14 because it constitutes, or is derived from, proceeds
15 obtained directly or indirectly as a result of the offenses
16 committed in Counts 2-12 and 22?

17 YES ☐ NO ☐

18 **Please proceed to Question 12.**

19
20 \$12,520.00 in U.S. Currency seized on November 5, 2020, in
21 Encino, California, at the residence of defendant Artur
22 Ayvazyan and Tamara Dadyan

23 12. Do you unanimously find by the preponderance of the
24 evidence that this property is subject to forfeiture
25 because it constitutes, or is derived from, proceeds
26 obtained directly or indirectly as a result of the offenses
27 committed in Counts 2-12 and 22?

28 YES ☐ NO ☐

1 **Please proceed to Question 13.**

2
3
4 **COUNTS THIRTEEN THROUGH TWENTY**

5 Following the guilty verdict against Defendant ARTUR AYVAZYAN on
6 Counts 13-20 of the FSI, the government seeks forfeiture of the
7 following property:

8 All of the convicted defendant's right, title and interest
9 in certain real property located in Tarzana, California
10 identified by Assessors Parcel Number 2176-029-031

11 13. Do you unanimously find by the preponderance of the
12 evidence that this property is subject to forfeiture
13 because it constitutes, or is derived from, proceeds
14 obtained directly or indirectly as a result of the offenses
15 committed in Counts 13-20?

16 YES ☐ NO ☐

17 **Please proceed to Question 14.**

18
19 All of the convicted defendant's right, title and interest
20 in certain real property located in Glendale, California
21 identified by Assessors Parcel Number 5663-036-033

22 14. Do you unanimously find by the preponderance of the
23 evidence that this property is subject to forfeiture
24 because it constitutes, or is derived from, proceeds
25 obtained directly or indirectly as a result of the offenses
26 committed in Counts 13-20?

27 YES ☐ NO ☐

28 **Please proceed to Question 15.**

1
2 All of the convicted defendant's right, title and interest
3 in certain real property located in Palm Desert, California
4 identified by Assessors Parcel Number 694-331-008

5 15. Do you unanimously find by the preponderance of the
6 evidence that this property is subject to forfeiture
7 because it constitutes, or is derived from, proceeds
8 obtained directly or indirectly as a result of the offenses
9 committed in Counts 13-20?

10 YES ☐ NO ☐

11 **Please proceed to Question 16.**

12
13 \$74,557.79 in bank funds seized from Bank of America
14 account number ending in 7695 held in the name of Allstate
15 Towing & Transport LLC

16 16. Do you unanimously find by the preponderance of the
17 evidence that this property is subject to forfeiture
18 because it constitutes, or is derived from, proceeds
19 obtained directly or indirectly as a result of the offenses
20 committed in Counts 13-20?

21 YES ☐ NO ☐

22 **Please proceed to Question 17.**

23
24 \$65,990.43 in bank funds seized from Bank of America
25 account ending in '9700 in the name of Runyan Tax Service
26 Inc.

27 17. Do you unanimously find by the preponderance of the
28 evidence that this property is subject to forfeiture

1 because it constitutes, or is derived from, proceeds
2 obtained directly or indirectly as a result of the offenses
3 committed in Counts 13-20?

4 YES ☐ NO ☐

5 **Please proceed to Question 18.**

6
7 \$12,520.00 in U.S. Currency seized on November 5, 2020, in
8 Encino, California, at the residence of defendant Artur
9 Ayvazyan and Tamara Dadyan

10 18. Do you unanimously find by the preponderance of the
11 evidence that this property is subject to forfeiture
12 because it constitutes, or is derived from, proceeds
13 obtained directly or indirectly as a result of the offenses
14 committed in Counts 13-20?

15 YES ☐ NO ☐

16 **Please proceed to Question 19.**

17
18 **COUNT TWENTY-SIX**

19 Following the guilty verdict against Defendant ARTUR AYVAZYAN on
20 Count 26 of the FSI, the government seeks forfeiture of the following
21 property:

22 All of the convicted defendant's right, title and interest
23 in certain real property located in Tarzana, California
24 identified by Assessors Parcel Number 2176-029-031

25 19. Do you unanimously find by a preponderance of the evidence
26 that this property is subject to forfeiture because it is
27 property involved in the offense committed in Count 26?

28 YES ☐ NO ☐

1 **Please proceed to Question 20.**

2
3 All of the convicted defendant's right, title and interest
4 in certain real property located in Glendale, California
5 identified by Assessors Parcel Number 5663-036-033

6 20. Do you unanimously find by a preponderance of the evidence
7 that this property is subject to forfeiture because it is
8 property involved in the offense committed in Count 26?

9 YES ☐ NO ☐

10 **Please proceed to Question 21.**

11
12 All of the convicted defendant's right, title and interest
13 in certain real property located in Palm Desert, California
14 identified by Assessors Parcel Number 694-331-008

15 21. Do you unanimously find by a preponderance of the evidence
16 that this property is subject to forfeiture because it is
17 property involved in the offense committed in Count 26?

18 YES ☐ NO ☐

19 **Please proceed to Question 22.**

20
21 \$74,557.79 in bank funds seized from Bank of America
22 account number ending in 7695 held in the name of Allstate
23 Towing & Transport LLC

24 22. Do you unanimously find by a preponderance of the evidence
25 that this property is subject to forfeiture because it is
26 property involved in the offense committed in Count 26?

27 YES ☐ NO ☐

28 **Please proceed to Question 23.**

1
2 \$65,990.43 in bank funds seized from Bank of America
3 account ending in '9700 in the name of Runyan Tax Service
4 Inc.

5 23. Do you unanimously find by a preponderance of the evidence
6 that this property is subject to forfeiture because it is
7 property involved in the offense committed in Count 26?

8 YES ☐ NO ☐

9 **Please proceed to Question 24.**

10
11 \$12,520.00 in U.S. Currency seized on November 5, 2020, in
12 Encino, California, at the residence of defendant Artur
13 Ayvazyan and Tamara Dadyan

14 24. Do you unanimously find by a preponderance of the evidence
15 that this property is subject to forfeiture because it is
16 property involved in the offense committed in Count 26?

17 YES ☐ NO ☐

18
19
20
21 _____
DATED

FOREPERSON

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICHARD AYVAZYAN,
MARIETTA TERABELIAN,
ARTUR AYVAZYAN,
TAMARA DADYAN,
MANUK GRIGORYAN,
ARMAN HAYRAPETYAN,
EDVARD PARONYAN,
VAHE DADYAN,

Defendants.

CR 2:20-579(A)-SVW

FORFEITURE SPECIAL VERDICT FORM=
FOR DEFENDANT MARIETTA TERABELIAN

1 We, the jury in the above-captioned case, present the following
2 unanimous verdict as to defendant MARIETTA TERABELIAN:

3 **COUNT ONE**

4 Following the guilty verdict against Defendant MARIETTA
5 TERABELIAN on Count 1 of the First Superseding Indictment ("FSI"),
6 the government seeks forfeiture of the following property:

7 All of the convicted defendant's right, title and interest
8 in certain real property located in Tarzana, California
9 identified by Assessors Parcel Number 2176-029-031

10 1. Do you unanimously find by the preponderance of the
11 evidence that this property is subject to forfeiture
12 because it constitutes, or is derived from, proceeds
13 obtained directly or indirectly as a result of the offense
14 committed in Count 1?

15 YES ☐ NO ☐

16 **Please proceed to Question 2.**

17
18 All of the convicted defendant's right, title and interest
19 in certain real property located in Glendale, California
20 identified by Assessors Parcel Number 5663-036-033

21 2. Do you unanimously find by the preponderance of the
22 evidence that this property is subject to forfeiture
23 because it constitutes, or is derived from, proceeds
24 obtained directly or indirectly as a result of the offense
25 committed in Count 1?

26 YES ☐ NO ☐

27 **Please proceed to Question 3.**

1 All of the convicted defendant's right, title and interest
2 in certain real property located in Palm Desert, California
3 identified by Assessors Parcel Number 694-331-008

4 3. Do you unanimously find by the preponderance of the
5 evidence that this property is subject to forfeiture
6 because it constitutes, or is derived from, proceeds
7 obtained directly or indirectly as a result of the offense
8 committed in Count 1?

9 YES ☐ NO ☐

10 **Please proceed to Question 4.**

11
12 \$74,557.79 in bank funds seized from Bank of America
13 account number ending in 7695 held in the name of Allstate
14 Towing & Transport LLC

15 4. Do you unanimously find by the preponderance of the
16 evidence that this property is subject to forfeiture
17 because it constitutes, or is derived from, proceeds
18 obtained directly or indirectly as a result of the offense
19 committed in Count 1?

20 YES ☐ NO ☐

21 **Please proceed to Question 5.**

22
23 \$65,990.43 in bank funds seized from Bank of America
24 account ending in '9700 in the name of Runyan Tax Service
25 Inc.

26 5. Do you unanimously find by the preponderance of the
27 evidence that this property is subject to forfeiture
28 because it constitutes, or is derived from, proceeds

1 obtained directly or indirectly as a result of the offense
2 committed in Count 1?

3 YES ☐ NO ☐

4 **Please proceed to Question 6.**

5
6 \$451,185.00 in U.S. Currency seized on November 5, 2020, in
7 various areas and backyard of a Tarzana, California
8 residence

9 6. Do you unanimously find by the preponderance of the
10 evidence that this property is subject to forfeiture
11 because it constitutes, or is derived from, proceeds
12 obtained directly or indirectly as a result of the offense
13 committed in Count 1?

14 YES ☐ NO ☐

15 **Please proceed to Question 7.**

16
17 \$3,422.00 in U.S. Currency seized on November 20, 2020,
18 from Richard Ayvazyan and Marietta Terabelian at Miami
19 International Airport

20 7. Do you unanimously find by the preponderance of the
21 evidence that this property is subject to forfeiture
22 because it constitutes, or is derived from, proceeds
23 obtained directly or indirectly as a result of the offense
24 committed in Count 1?

25 YES ☐ NO ☐

26 **Please proceed to Question 8.**

1 One Audermars Piguet, Royal Oak 18 carat rose gold wrist
2 watch, model 26331, serial number J52335

3 8. Do you unanimously find by the preponderance of the
4 evidence that this property is subject to forfeiture
5 because it constitutes, or is derived from, proceeds
6 obtained directly or indirectly as a result of the offense
7 committed in Count 1?

8 YES ☐ NO ☐

9 **Please proceed to Question 9.**

10
11 One Rolex Datejust stainless steel wrist watch, model
12 126334, serial number 4U95Z313

13 9. Do you unanimously find by the preponderance of the
14 evidence that this property is subject to forfeiture
15 because it constitutes, or is derived from, proceeds
16 obtained directly or indirectly as a result of the offense
17 committed in Count 1?

18 YES ☐ NO ☐

19 **Please proceed to Question 10.**

20
21 One Audemars Piguet, Royal Oak Offshore black ceramic wrist
22 watch, serial number K23313

23 10. Do you unanimously find by the preponderance of the
24 evidence that this property is subject to forfeiture
25 because it constitutes, or is derived from, proceeds
26 obtained directly or indirectly as a result of the offense
27 committed in Count 1?

28 YES ☐ NO ☐

1 **Please proceed to Question 11.**

2
3 One Audemars Piguet Royal Oak Offshore black ceramic wrist
4 watch, serial number LU44845K

5 11. Do you unanimously find by the preponderance of the
6 evidence that this property is subject to forfeiture
7 because it constitutes, or is derived from, proceeds
8 obtained directly or indirectly as a result of the offense
9 committed in Count 1?

10 YES ☐ NO ☐

11 **Please proceed to Question 12.**

12
13 One Audemars Piguet Royal Oak stainless steel wrist watch,
14 serial number LW3397N

15 12. Do you unanimously find by the preponderance of the
16 evidence that this property is subject to forfeiture
17 because it constitutes, or is derived from, proceeds
18 obtained directly or indirectly as a result of the offense
19 committed in Count 1?

20 YES ☐ NO ☐

21 **Please proceed to Question 13.**

22
23 One Rolex Day-Date watch, serial number W44P7238

24 13. Do you unanimously find by the preponderance of the
25 evidence that this property is subject to forfeiture
26 because it constitutes, or is derived from, proceeds
27 obtained directly or indirectly as a result of the offense
28 committed in Count 1?

YES ☐ NO ☐

Please proceed to Question 14.

Sixty Gold Bullion Coins

14. Do you unanimously find by the preponderance of the evidence that this property is subject to forfeiture because it constitutes, or is derived from, proceeds obtained directly or indirectly as a result of the offense committed in Count 1?

YES ☐ NO ☐

Please proceed to Question 15.

One 14 carat yellow gold 24" neck chain

15. Do you unanimously find by the preponderance of the evidence that this property is subject to forfeiture because it constitutes, or is derived from, proceeds obtained directly or indirectly as a result of the offense committed in Count 1?

YES ☐ NO ☐

Please proceed to Question 16.

One Pair of 14 carat white gold earrings with diamond studs

16. Do you unanimously find by the preponderance of the evidence that this property is subject to forfeiture because it constitutes, or is derived from, proceeds obtained directly or indirectly as a result of the offense committed in Count 1?

YES ☐ NO ☐

1 **Please proceed to Question 17.**

2
3 **COUNTS TWO THROUGH TWELVE**

4 Following the guilty verdict against Defendant MARIETTA
5 TERABELIAN on Counts 2-12 of the FSI, the government seeks forfeiture
6 of the following property:

7 All of the convicted defendant's right, title and interest
8 in certain real property located in Tarzana, California
9 identified by Assessors Parcel Number 2176-029-031

10 17. Do you unanimously find by the preponderance of the
11 evidence that this property is subject to forfeiture
12 because it constitutes, or is derived from, proceeds
13 obtained directly or indirectly as a result of the offenses
14 committed in Counts 2-12?

15 YES ☐ NO ☐

16 **Please proceed to Question 18.**

17
18 All of the convicted defendant's right, title and interest
19 in certain real property located in Glendale, California
20 identified by Assessors Parcel Number 5663-036-033

21 18. Do you unanimously find by the preponderance of the
22 evidence that this property is subject to forfeiture
23 because it constitutes, or is derived from, proceeds
24 obtained directly or indirectly as a result of the offenses
25 committed in Counts 2-12?

26 YES ☐ NO ☐

27 **Please proceed to Question 19.**

1 All of the convicted defendant's right, title and interest
2 in certain real property located in Palm Desert, California
3 identified by Assessors Parcel Number 694-331-008

4 19. Do you unanimously find by the preponderance of the
5 evidence that this property is subject to forfeiture
6 because it constitutes, or is derived from, proceeds
7 obtained directly or indirectly as a result of the offenses
8 committed in Counts 2-12?

9 YES ☐ NO ☐

10 **Please proceed to Question 20.**

11
12 \$74,557.79 in bank funds seized from Bank of America
13 account number ending in 7695 held in the name of Allstate
14 Towing & Transport LLC

15 20. Do you unanimously find by the preponderance of the
16 evidence that this property is subject to forfeiture
17 because it constitutes, or is derived from, proceeds
18 obtained directly or indirectly as a result of the offenses
19 committed in Counts 2-12?

20 YES ☐ NO ☐

21 **Please proceed to Question 21.**

22
23 \$65,990.43 in bank funds seized from Bank of America
24 account ending in '9700 in the name of Runyan Tax Service
25 Inc.

26 21. Do you unanimously find by the preponderance of the
27 evidence that this property is subject to forfeiture
28 because it constitutes, or is derived from, proceeds

obtained directly or indirectly as a result of the offenses
committed in Counts 2-12?

YES ☐ NO ☐

Please proceed to Question 22.

\$451,185.00 in U.S. Currency seized on November 5, 2020, in
various areas and backyard of a Tarzana, California
residence

22. Do you unanimously find by the preponderance of the
evidence that this property is subject to forfeiture
because it constitutes, or is derived from, proceeds
obtained directly or indirectly as a result of the offenses
committed in Counts 2-12?

YES ☐ NO ☐

Please proceed to Question 23.

\$3,422.00.00 in U.S. Currency seized on November 20, 2020,
from Richard Ayvazyan and Marietta Terabelian at the Miami
International Airport

23. Do you unanimously find by the preponderance of the
evidence that this property is subject to forfeiture
because it constitutes, or is derived from, proceeds
obtained directly or indirectly as a result of the offenses
committed in Counts 2-12?

YES ☐ NO ☐

Please proceed to Question 24.

1 One Audermars Piguet, Royal Oak 18 carat rose gold wrist
2 watch, model 26331, serial number J52335

3 24. Do you unanimously find by the preponderance of the
4 evidence that this property is subject to forfeiture
5 because it constitutes, or is derived from, proceeds
6 obtained directly or indirectly as a result of the offenses
7 committed in Counts 2-12?

8 YES ☐ NO ☐

9 **Please proceed to Question 25.**

10
11 One Rolex Datejust stainless steel wrist watch, model
12 126334, serial number 4U95Z313

13 25. Do you unanimously find by the preponderance of the
14 evidence that this property is subject to forfeiture
15 because it constitutes, or is derived from, proceeds
16 obtained directly or indirectly as a result of the offenses
17 committed in Counts 2-12?

18 YES ☐ NO ☐

19 **Please proceed to Question 26.**

20
21 One Audemars Piguet, Royal Oak Offshore black ceramic wrist
22 watch, serial number K23313

23 26. Do you unanimously find by the preponderance of the
24 evidence that this property is subject to forfeiture
25 because it constitutes, or is derived from, proceeds
26 obtained directly or indirectly as a result of the offenses
27 committed in Counts 2-12?

28 YES ☐ NO ☐

1 **Please proceed to Question 27.**

2
3 One Audemars Piguet Royal Oak Offshore black ceramic wrist
4 watch, serial number LU44845K

5 27. Do you unanimously find by the preponderance of the
6 evidence that this property is subject to forfeiture
7 because it constitutes, or is derived from, proceeds
8 obtained directly or indirectly as a result of the offenses
9 committed in Counts 2-12?

10 YES ☐ NO ☐

11 **Please proceed to Question 28.**

12
13 One Audemars Piguet Royal Oak stainless steel wrist watch,
14 serial number LW3397N

15 28. Do you unanimously find by the preponderance of the
16 evidence that this property is subject to forfeiture
17 because it constitutes, or is derived from, proceeds
18 obtained directly or indirectly as a result of the offenses
19 committed in Counts 2-12?

20 YES ☐ NO ☐

21 **Please proceed to Question 29.**

22
23 One Rolex Day-Date watch, serial number W44P7238

24 29. Do you unanimously find by the preponderance of the
25 evidence that this property is subject to forfeiture
26 because it constitutes, or is derived from, proceeds
27 obtained directly or indirectly as a result of the offenses
28 committed in Counts 2-12?

YES ☐ NO ☐

Please proceed to Question 30.

Sixty Gold Bullion Coins

30. Do you unanimously find by the preponderance of the evidence that this property is subject to forfeiture because it constitutes, or is derived from, proceeds obtained directly or indirectly as a result of the offenses committed in Counts 2-12?

YES ☐ NO ☐

Please proceed to Question 31.

One 14 carat yellow gold 24" neck chain

31. Do you unanimously find by the preponderance of the evidence that this property is subject to forfeiture because it constitutes, or is derived from, proceeds obtained directly or indirectly as a result of the offenses committed in Counts 2-12?

YES ☐ NO ☐

Please proceed to Question 32.

One Pair of 14 carat white gold earrings with diamond studs

32. Do you unanimously find by the preponderance of the evidence that this property is subject to forfeiture because it constitutes, or is derived from, proceeds obtained directly or indirectly as a result of the offenses committed in Counts 2-12?

YES ☐ NO ☐

1 **Please proceed to Question 33.**

2
3 **COUNTS THIRTEEN THROUGH TWENTY**

4 Following the guilty verdict against Defendant MARIETTA
5 TERABELIAN on Counts 13-20 of the FSI, the government seeks
6 forfeiture of the following property:

7
8 All of the convicted defendant's right, title and interest
9 in certain real property located in Tarzana, California
10 identified by Assessors Parcel Number 2176-029-031

11 33. Do you unanimously find by the preponderance of the
12 evidence that this property is subject to forfeiture
13 because it constitutes, or is derived from, proceeds
14 obtained directly or indirectly as a result of the offenses
15 committed in Counts 13-20?

16 YES ☐ NO ☐

17 **Please proceed to Question 34.**

18
19 All of the convicted defendant's right, title and interest
20 in certain real property located in Glendale, California
21 identified by Assessors Parcel Number 5663-036-033

22 34. Do you unanimously find by the preponderance of the
23 evidence that this property is subject to forfeiture
24 because it constitutes, or is derived from, proceeds
25 obtained directly or indirectly as a result of the offenses
26 committed in Counts 13-20?

27 YES ☐ NO ☐

28 **Please proceed to Question 35.**

1
2 All of the convicted defendant's right, title and interest
3 in certain real property located in Palm Desert, California
4 identified by Assessors Parcel Number 694-331-008

5 35. Do you unanimously find by the preponderance of the
6 evidence that this property is subject to forfeiture
7 because it constitutes, or is derived from, proceeds
8 obtained directly or indirectly as a result of the offenses
9 committed in Counts 13-20?

10 YES ☐ NO ☐

11 **Please proceed to Question 36.**

12
13 \$74,557.79 in bank funds seized from Bank of America
14 account number ending in 7695 held in the name of Allstate
15 Towing & Transport LLC

16 36. Do you unanimously find by the preponderance of the
17 evidence that this property is subject to forfeiture
18 because it constitutes, or is derived from, proceeds
19 obtained directly or indirectly as a result of the offenses
20 committed in Counts 13-20?

21 YES ☐ NO ☐

22 **Please proceed to Question 37.**

23
24 \$65,990.43 in bank funds seized from Bank of America
25 account ending in '9700 in the name of Runyan Tax Service
26 Inc.

27 37. Do you unanimously find by the preponderance of the
28 evidence that this property is subject to forfeiture

1 because it constitutes, or is derived from, proceeds
2 obtained directly or indirectly as a result of the offenses
3 committed in Counts 13-20?

4 YES ☐ NO ☐

5 **Please proceed to Question 38.**

6
7 \$451,185.00 in U.S. Currency seized on November 5, 2020, in
8 various areas and backyard of a Tarzana, California
9 residence

10 38. Do you unanimously find by the preponderance of the
11 evidence that this property is subject to forfeiture
12 because it constitutes, or is derived from, proceeds
13 obtained directly or indirectly as a result of the offenses
14 committed in Counts 13-20?

15 YES ☐ NO ☐

16 **Please proceed to Question 39.**

17
18 \$3,422.00.00 in U.S. Currency seized on November 20, 2020,
19 from Richard Ayvazyan and Marietta Terabelian at the Miami
20 International Airport

21 39. Do you unanimously find by the preponderance of the
22 evidence that this property is subject to forfeiture
23 because it constitutes, or is derived from, proceeds
24 obtained directly or indirectly as a result of the offenses
25 committed in Counts 13-20?

26 YES ☐ NO ☐

27 **Please proceed to Question 40.**

One Audermars Piguet, Royal Oak 18 carat rose gold wrist watch, model 26331, serial number J52335

40. Do you unanimously find by the preponderance of the evidence that this property is subject to forfeiture because it constitutes, or is derived from, proceeds obtained directly or indirectly as a result of the offenses committed in Counts 13-20?

YES ☐ NO ☐

Please proceed to Question 41.

One Rolex Datejust stainless steel wrist watch, model 126334, serial number 4U95Z313

41. Do you unanimously find by the preponderance of the evidence that this property is subject to forfeiture because it constitutes, or is derived from, proceeds obtained directly or indirectly as a result of the offenses committed in Counts 13-20?

YES ☐ NO ☐

Please proceed to Question 42.

One Audemars Piguet, Royal Oak Offshore black ceramic wrist watch, serial number K23313

42. Do you unanimously find by the preponderance of the evidence that this property is subject to forfeiture because it constitutes, or is derived from, proceeds obtained directly or indirectly as a result of the offenses committed in Counts 13-20?

YES ☐ NO ☐

Please proceed to Question 43.

One Audemars Piguet Royal Oak Offshore black ceramic wrist watch, serial number LU44845K

43. Do you unanimously find by the preponderance of the evidence that this property is subject to forfeiture because it constitutes, or is derived from, proceeds obtained directly or indirectly as a result of the offenses committed in Counts 13-20?

YES ☐ NO ☐

Please proceed to Question 44.

One Audemars Piguet Royal Oak stainless steel wrist watch, serial number LW3397N

44. Do you unanimously find by the preponderance of the evidence that this property is subject to forfeiture because it constitutes, or is derived from, proceeds obtained directly or indirectly as a result of the offenses committed in Counts 13-20?

YES ☐ NO ☐

Please proceed to Question 45.

One Rolex Day-Date watch, serial number W44P7238

45. Do you unanimously find by the preponderance of the evidence that this property is subject to forfeiture because it constitutes, or is derived from, proceeds obtained directly or indirectly as a result of the offenses

committed in Counts 13-20?

YES ☐ NO ☐

Please proceed to Question 46.

Sixty Gold Bullion Coins

46. Do you unanimously find by the preponderance of the evidence that this property is subject to forfeiture because it constitutes, or is derived from, proceeds obtained directly or indirectly as a result of the offenses committed in Counts 13-20?

YES ☐ NO ☐

Please proceed to Question 47.

One 14 carat yellow gold 24" neck chain

47. Do you unanimously find by the preponderance of the evidence that this property is subject to forfeiture because it constitutes, or is derived from, proceeds obtained directly or indirectly as a result of the offenses committed in Counts 13-20?

YES ☐ NO ☐

Please proceed to Question 48.

One Pair of 14 carat white gold earrings with diamond studs

48. Do you unanimously find by the preponderance of the evidence that this property is subject to forfeiture because it constitutes, or is derived from, proceeds obtained directly or indirectly as a result of the offenses committed in Counts 13-20?

YES ☐ NO ☐

Please proceed to Question 49.

COUNT TWENTY-SIX

Following the guilty verdict against Defendant MARIETTA TERABELIAN on Count 26 of the FSI, the government seeks forfeiture of the following property:

All of the convicted defendant's right, title and interest in certain real property located in Tarzana, California identified by Assessors Parcel Number 2176-029-031

49. Do you unanimously find by a preponderance of the evidence that this property is subject to forfeiture because it is property involved in the offense committed in Count 26?

YES ☐ NO ☐

Please proceed to Question 50.

All of the convicted defendant's right, title and interest in certain real property located in Glendale, California identified by Assessors Parcel Number 5663-036-033

50. Do you unanimously find by a preponderance of the evidence that this property is subject to forfeiture because it is property involved in the offense committed in Count 26?

YES ☐ NO ☐

Please proceed to Question 51.

All of the convicted defendant's right, title and interest in certain real property located in Palm Desert, California identified by Assessors Parcel Number 694-331-008

1 51. Do you unanimously find by a preponderance of the evidence
2 that this property is subject to forfeiture because it is
3 property involved in the offense committed in Count 26?

4 YES ☐ NO ☐

5 **Please proceed to Question 52.**

6
7 \$74,557.79 in bank funds seized from Bank of America
8 account number ending in 7695 held in the name of Allstate
9 Towing & Transport LLC

10 52. Do you unanimously find by a preponderance of the evidence
11 that this property is subject to forfeiture because it is
12 property involved in the offense committed in Count 26?

13 YES ☐ NO ☐

14 **Please proceed to Question 53.**

15
16 \$65,990.43 in bank funds seized from Bank of America
17 account ending in '9700 in the name of Runyan Tax Service
18 Inc.

19 53. Do you unanimously find by a preponderance of the evidence
20 that this property is subject to forfeiture because it is
21 property involved in the offense committed in Count 26?

22 YES ☐ NO ☐

23 **Please proceed to Question 54.**

24
25 \$451,185.00 in U.S. Currency seized on November 5, 2020, in
26 various areas and backyard of a Tarzana, California
27 residence

28 54. Do you unanimously find by a preponderance of the evidence

1 that this property is subject to forfeiture because it is
2 property involved in the offense committed in Count 26?

3 YES ☐ NO ☐

4 **Please proceed to Question 55.**

5
6 \$3,422.00.00 in U.S. Currency seized on November 20, 2020,
7 from Richard Ayvazyan and Marietta Terabelian at the Miami
8 International Airport

9 55. Do you unanimously find by a preponderance of the evidence
10 that this property is subject to forfeiture because it is
11 property involved in the offense committed in Count 26?

12 YES ☐ NO ☐

13 **Please proceed to Question 56.**

14
15 One Audermars Piguet, Royal Oak 18 carat rose gold wrist
16 watch, model 26331, serial number J52335

17 56. Do you unanimously find by a preponderance of the evidence
18 that this property is subject to forfeiture because it is
19 property involved in the offense committed in Count 26?

20 YES ☐ NO ☐

21 **Please proceed to Question 57**

22
23 One Rolex Datejust stainless steel wrist watch, model
24 126334, serial number 4U95Z313

25 57. Do you unanimously find by a preponderance of the evidence
26 that this property is subject to forfeiture because it is
27 property involved in the offense committed in Count 26?

28 YES ☐ NO ☐

1 **Please proceed to Question 58.**

2
3 One Audemars Piguet, Royal Oak Offshore black ceramic wrist
4 watch, serial number K23313

5 58. Do you unanimously find by a preponderance of the evidence
6 that this property is subject to forfeiture because it is
7 property involved in the offense committed in Count 26?

8 YES ☐ NO ☐

9 **Please proceed to Question 59.**

10
11 One Audemars Piguet Royal Oak Offshore black ceramic wrist
12 watch, serial number LU44845K

13 59. Do you unanimously find by a preponderance of the evidence
14 that this property is subject to forfeiture because it is
15 property involved in the offense committed in Count 26?

16 YES ☐ NO ☐

17 **Please proceed to Question 60.**

18
19 One Audemars Piguet Royal Oak stainless steel wrist watch,
20 serial number LW3397N

21 60. Do you unanimously find by a preponderance of the evidence
22 that this property is subject to forfeiture because it is
23 property involved in the offense committed in Count 26?

24 YES ☐ NO ☐

25 **Please proceed to Question 61.**

26
27 One Rolex Day-Date watch, serial number W44P7238

28 61. Do you unanimously find by a preponderance of the evidence

1 that this property is subject to forfeiture because it is
2 property involved in the offense committed in Count 26?

3 YES ☐ NO ☐

4 **Please proceed to Question 62.**

5
6 Sixty Gold Bullion Coins

7 62. Do you unanimously find by a preponderance of the evidence
8 that this property is subject to forfeiture because it is
9 property involved in the offense committed in Count 26?

10 YES ☐ NO ☐

11 **Please proceed to Question 63.**

12
13 One 14 carat yellow gold 24" neck chain

14 63. Do you unanimously find by a preponderance of the evidence
15 that this property is subject to forfeiture because it is
16 property involved in the offense committed in Count 26?

17 YES ☐ NO ☐

18 **Please proceed to Question 64.**

19
20 One Pair of 14 carat white gold earrings with diamond studs

21 64. Do you unanimously find by a preponderance of the evidence
22 that this property is subject to forfeiture because it is
23 property involved in the offense committed in Count 26?

24 YES ☐ NO ☐

25
26
27
28 _____
DATED

FOREPERSON

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICHARD AYVAZIAN,
MARIETTA TERABELIAN,
ARTUR AYVAZIAN,
TAMARA DADYAN,
MANUK GRIGORYAN,
ARMAN HAYRAPETYAN,
EDVARD PARONYAN,
VAHE DADYAN,

Defendants.

CR 2:20-579(A)-SVW

FORFEITURE SPECIAL VERDICT FORM=
FOR DEFENDANT VAHE DADYAN

1 We, the jury in the above-captioned case, present the following
2 unanimous verdict as to defendant VAHE DADYAN:

3 **COUNT ONE**

4 Following the guilty verdict against Defendant VAHE DADYAN on
5 Count 1 of the First Superseding Indictment ("FSI"), the government
6 seeks forfeiture of the following property:

7 All of the convicted defendant's right, title and interest
8 in certain real property located in Tarzana, California
9 identified by Assessors Parcel Number 2176-029-031

10 1. Do you unanimously find by the preponderance of the
11 evidence that this property is subject to forfeiture
12 because it constitutes, or is derived from, proceeds
13 obtained directly or indirectly as a result of the offense
14 committed in Count 1?

15 YES ☐ NO ☐

16 **Please proceed to Question 2.**

17
18 All of the convicted defendant's right, title and interest
19 in certain real property located in Glendale, California
20 identified by Assessors Parcel Number 5663-036-033

21 2. Do you unanimously find by the preponderance of the
22 evidence that this property is subject to forfeiture
23 because it constitutes, or is derived from, proceeds
24 obtained directly or indirectly as a result of the offense
25 committed in Count 1?

26 YES ☐ NO ☐

27 **Please proceed to Question 3.**

1 All of the convicted defendant's right, title and interest
2 in certain real property located in Palm Desert, California
3 identified by Assessors Parcel Number 694-331-008

4 3. Do you unanimously find by the preponderance of the
5 evidence that this property is subject to forfeiture
6 because it constitutes, or is derived from, proceeds
7 obtained directly or indirectly as a result of the offense
8 committed in Count 1?

9 YES ☐ NO ☐

10 **Please proceed to Question 4.**

11
12 \$65,990.43 in bank funds seized from Bank of America
13 account ending in '9700 in the name of Runyan Tax Service
14 Inc.

15 4. Do you unanimously find by the preponderance of the
16 evidence that this property is subject to forfeiture
17 because it constitutes, or is derived from, proceeds
18 obtained directly or indirectly as a result of the offense
19 committed in Count 1?

20 YES ☐ NO ☐

21 **Please proceed to Question 6.**

22
23 **COUNTS SEVEN THROUGH TWELVE**

24 Following the guilty verdict against Defendant VAHE DADYAN on
25 Counts 7-12 of the FSI, the government seeks forfeiture of the
26 following property:
27
28

1 All of the convicted defendant's right, title and interest
2 in certain real property located in Tarzana, California
3 identified by Assessors Parcel Number 2176-029-031

4 5. Do you unanimously find by the preponderance of the
5 evidence that this property is subject to forfeiture
6 because it constitutes, or is derived from, proceeds
7 obtained directly or indirectly as a result of the offenses
8 committed in Counts 7-12?

9 YES ☐ NO ☐

10 **Please proceed to Question 6.**

11
12 All of the convicted defendant's right, title and interest
13 in certain real property located in Glendale, California
14 identified by Assessors Parcel Number 5663-036-033

15 6. Do you unanimously find by the preponderance of the
16 evidence that this property is subject to forfeiture
17 because it constitutes, or is derived from, proceeds
18 obtained directly or indirectly as a result of the offenses
19 committed in Counts 7-12?

20 YES ☐ NO ☐

21 **Please proceed to Question 7.**

22
23 All of the convicted defendant's right, title and interest
24 in certain real property located in Palm Desert, California
25 identified by Assessors Parcel Number 694-331-008

26 7. Do you unanimously find by the preponderance of the
27 evidence that this property is subject to forfeiture
28 because it constitutes, or is derived from, proceeds

obtained directly or indirectly as a result of the offenses committed in Counts 7-12?

YES ☐ NO ☐

Please proceed to Question 8.

\$65,990.43 in bank funds seized from Bank of America account ending in '9700 in the name of Runyan Tax Service Inc.

8. Do you unanimously find by the preponderance of the evidence that this property is subject to forfeiture because it constitutes, or is derived from, proceeds obtained directly or indirectly as a result of the offenses committed in Counts 7-12?

YES ☐ NO ☐

Please proceed to Question 9.

COUNTS EIGHTEEN THROUGH TWENTY

Following the guilty verdict against Defendant VAHE DADYAN on Counts 18-20 of the FSI, the government seeks forfeiture of the following property:

All of the convicted defendant's right, title and interest in certain real property located in Tarzana, California identified by Assessors Parcel Number 2176-029-031

9. Do you unanimously find by the preponderance of the evidence that this property is subject to forfeiture because it constitutes, or is derived from, proceeds obtained directly or indirectly as a result of the offenses

1 committed in Counts 18-20?

2 YES ☐ NO ☐

3 **Please proceed to Question 10.**

4
5 All of the convicted defendant's right, title and interest
6 in certain real property located in Glendale, California
7 identified by Assessors Parcel Number 5663-036-033

8 10. Do you unanimously find by the preponderance of the
9 evidence that this property is subject to forfeiture
10 because it constitutes, or is derived from, proceeds
11 obtained directly or indirectly as a result of the offenses
12 committed in Counts 18-20?

13 YES ☐ NO ☐

14 **Please proceed to Question 11.**

15
16 All of the convicted defendant's right, title and interest
17 in certain real property located in Palm Desert, California
18 identified by Assessors Parcel Number 694-331-008

19 11. Do you unanimously find by the preponderance of the
20 evidence that this property is subject to forfeiture
21 because it constitutes, or is derived from, proceeds
22 obtained directly or indirectly as a result of the offenses
23 committed in Counts 18-20?

24 YES ☐ NO ☐

25 **Please proceed to Question 12.**

1 \$65,990.43 in bank funds seized from Bank of America
2 account ending in '9700 in the name of Runyan Tax Service
3 Inc.

4 12. Do you unanimously find by the preponderance of the
5 evidence that this property is subject to forfeiture
6 because it constitutes, or is derived from, proceeds
7 obtained directly or indirectly as a result of the offenses
8 committed in Counts 18-20?

9 YES ☐ NO ☐

10 **Please proceed to Question 13.**

11
12 **COUNT TWENTY-SIX**

13 Following the guilty verdict against Defendant VAHE DADYAN on
14 Count 26 of the FSI, the government seeks forfeiture of the following
15 property:

16 All of the convicted defendant's right, title and interest
17 in certain real property located in Tarzana, California
18 identified by Assessors Parcel Number 2176-029-031

19 13. Do you unanimously find by a preponderance of the evidence
20 that this property is subject to forfeiture because it is
21 property involved in the offense committed in Count 26?

22 YES ☐ NO ☐

23 **Please proceed to Question 14.**

24
25 All of the convicted defendant's right, title and interest
26 in certain real property located in Glendale, California
27 identified by Assessors Parcel Number 5663-036-033

28 14. Do you unanimously find by a preponderance of the evidence

1 that this property is subject to forfeiture because it is
2 property involved in the offense committed in Count 26?

3 YES ☐ NO ☐

4 **Please proceed to Question 15.**

5
6 All of the convicted defendant's right, title and interest
7 in certain real property located in Palm Desert, California
8 identified by Assessors Parcel Number 694-331-008

9 15. Do you unanimously find by a preponderance of the evidence
10 that this property is subject to forfeiture because it is
11 property involved in the offense committed in Count 26?

12 YES ☐ NO ☐

13 **Please proceed to Question 16.**

14
15 \$65,990.43 in bank funds seized from Bank of America
16 account ending in '9700 in the name of Runyan Tax Service
17 Inc.

18 16. Do you unanimously find by a preponderance of the evidence
19 that this property is subject to forfeiture because it is
20 property involved in the offense committed in Count 26?

21 YES ☐ NO ☐

22
23
24
25 DATED _____

FOREPERSON _____