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8 UNITED STATES DISTRICT COURT
9 FOR THE CENTRAL DISTRICT OF CALIFORNIA
10 WESTERN DIVISION

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 ARMAN HAYRAPETYAN,
15 Defendant.
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No. CR 20-00579-SVW-6

[PROPOSED] PRELIMINARY ORDER
OF FORFEITURE PURSUANT TO PLEA
AGREEMENT AS TO PERSONAL
PROPERTY

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18 Upon consideration of the application of Plaintiff, United
19 States of America, for a preliminary order of forfeiture
20 pursuant to the plea agreement of, and guilty plea to Count
21 Twenty-six of the First Superseding Indictment entered by,
22 defendant ARMAN HAYRAPETYAN, and, good cause appearing thereon,
23 IT IS HEREBY ORDERED:

24 **I. FORFEITABLE PROPERTY**

25 For the reasons set out below, any right, title and
26 interest of defendant Arman Hayrapetyan in the following
27 described property (hereinafter, the "Forfeitable Property") is
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1 hereby forfeited to the United States. The Court finds that the
2 government has established the requisite nexus between the
3 Forfeitable Property and the offenses described in Count Twenty-
4 six of the First Superseding Indictment, which charge defendant
5 with 18 U.S.C. § 1956(h) (conspiracy to commit money
6 laundering). The Forfeitable Property is more particularly
7 described as:

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

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

14 c. \$451,185.00 in U.S. Currency seized on November 5,
15 2020, in various areas and backyard of a Tarzana, California
16 residence;

17 d. One Santos De Cartier stainless steel wrist watch,
18 model 4183, serial number 163389YX;

19 e. One Audermars Piguet, Royal Oak 18 carat rose gold
20 wrist watch, model 26331, serial number J52335 seized on
21 November 5, 2020 in various areas and backyard of a Tarzana,
22 California residence;

23 f. One Rolex Datejust stainless steel wrist watch, model
24 126334, serial number 4U95Z313 seized on November 5, 2020 in
25 various areas and backyard of a Tarzana, California residence;
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1 g. One Audemars Piguet, Royal Oak Offshore black ceramic
2 wrist watch, serial number K23313 seized on November 5, 2020 in
3 various areas and backyard of a Tarzana, California residence;

4 h. One Audemars Piguet Royal Oak Offshore black ceramic
5 wrist watch, serial number LU44845K seized on November 5, 2020
6 in various areas and backyard of a Tarzana, California
7 residence;

8 i. One Audemars Piguet Royal Oak stainless steel wrist
9 watch, serial number LW3397N seized on November 5, 2020 in
10 various areas and backyard of a Tarzana, California residence;

11 j. One Rolex Day-Date watch, serial number W44P7238
12 seized on October 20, 2020 at the Miami International Airport
13 from Richard Ayvazyan and Marietta Terabelian;

14 k. Sixty Gold Bullion Coins seized on November 5, 2020 in
15 various areas and backyard of a Tarzana, California residence;

16 l. One 14 carat yellow gold 24" neck chain seized on
17 October 20, 2020 at the Miami International Airport from Richard
18 Ayvazyan and Marietta Terabelian;

19 m. One Pair of 14 carat white gold earrings with diamond
20 stud seized on October 20, 2020 at the Miami International
21 Airport from Richard Ayvazyan and Marietta Terabelian.

22 **II. IMPLEMENTATION**

23 IT IS FURTHER ORDERED as follows:

24 A. Upon the entry of this Order, and pursuant to Fed. R.
25 Crim. P. 32.2(b)(3) and 21 U.S.C. § 853, the United States
26 Attorney General (or a designee) is authorized to seize the
27 Forfeitable Property.
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1 B. Upon entry of this Order, the United States is further
2 authorized to conduct any discovery for the purpose of
3 identifying, locating, or disposing of the Forfeitable Property
4 subject to forfeiture pursuant to this Order, 21 U.S.C. § 853(m)
5 and Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure.
6 "Any discovery" shall include all methods of discovery permitted
7 under the Federal Rules of Civil Procedure.

8 C. Upon entry of this Order (and at any time in the
9 future after amendment of the applicable order of forfeiture in
10 this matter), the United States Attorney General (or a designee)
11 is authorized to commence any applicable proceeding to comply
12 with statutes governing third party rights, including giving
13 notice of this and any other Order affecting specific property.
14 The following paragraphs shall apply to any ancillary proceeding
15 conducted in this matter:

16 (1) Pursuant to 21 U.S.C. § 853(n)(1) and
17 Supplemental Rule G(4)(a)(iv)(C) of the Supplemental Rules for
18 Admiralty or Maritime Claims and Asset Forfeiture Actions, the
19 government shall forthwith publish for at least thirty (30)
20 consecutive days on an official government website notice of
21 this order and any other Order affecting the Forfeitable
22 Property, and notice that any person, other than the defendant,
23 having or claiming a legal interest in the property must file a
24 petition with the Court within thirty (30) days of the
25 publication of notice or receipt of actual notice, whichever is
26 earlier. The United States shall also, to the extent
27 practicable, provide written notice to any person known to have
28 an alleged interest in the Forfeitable Property.

1 (2) Any person other than defendant ARMAN HAYRAPETYAN
2 ("defendant") asserting a legal interest in the Forfeitable
3 Property may, within thirty days of the publication of notice or
4 receipt of notice, whichever is earlier, petition the court for
5 a hearing without a jury to adjudicate the validity of his or
6 her alleged interest in the property, and for an amendment of
7 the order of forfeiture, pursuant to 21 U.S.C. § 853(n) (2).

8 (3) Any petition filed by a third party asserting an
9 interest in the Forfeitable Property shall be signed by the
10 petitioner under penalty of perjury and shall set forth the
11 nature and extent of the petitioner's right, title, or interest
12 in such property, the time and circumstances of the petitioner's
13 acquisition of the right, title or interest in the property, any
14 additional facts supporting the petitioner's claim, and the
15 relief sought. 21 U.S.C. § 853(n) (3).

16 (4) The United States shall have clear title to the
17 Forfeitable Property following the Court's disposition of all
18 third-party interests or, if no petitions are filed, following
19 the expiration of the period provided in 21 U.S.C. § 853(n) (2)
20 for the filing of third party petitions.

21 D. Pursuant to Fed. R. Crim. P. 32.2(b) (3) and
22 defendant's consent, this Preliminary Order of Forfeiture shall
23 become final as to defendant ARMAN HAYRAPETYAN upon entry and
24 shall be made part of his sentence and included in his judgment.

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1 E. The Court shall retain jurisdiction to enforce this
2 Order, and to amend it as necessary, pursuant to Fed. R. Crim.
3 P. 32.2(e).

4 DATED: _____
5 HONORABLE STEPHEN V. WILSON
UNITED STATES DISTRICT JUDGE

6 PRESENTED BY:

7 TRACY L. WILKISON
8 Acting United States Attorney

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

11 /s/Brent A. Whittlesey
12 BRENT A. WHITTLESEY
Assistant United States Attorney
13 Asset Forfeiture Section

14 Attorneys for Plaintiff
UNITED STATES OF AMERICA
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