EXHIBIT A

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Attorney for Petitioner
RICHARD AYVAZYAN

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION

RICHARD AYVAZYAN,

Petitioner

vs.

UNITED STATES OF AMERICA,

Respondent.

Case No.: 2:22-cv-08915

[CR No. 2:20-cr-579-SVW]

DECLARATION OF CARLO BROOKS IN SUPPORT OF PETITIONER RICHARD AYVAZYAN'S MOTION TO VACATE, SET ASIDE, OR CORRECT SENTENCE UNDER 28 U.S.C. § 2255

I, Carlo Brooks, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California and Counsel for Petitioner Richard Ayvazyan in the above-captioned matter.

2. Petitioner was returned to the United States approximately three weeks ago and was only able to retain post-conviction counsel on or around November 27, 2022.

3. Petitioner did not receive information concerning the availability of, or ability to, appeal his convictions and/or sentence

4. Undersigned counsel received the pleadings and transcripts from trial counsel on November 28, 2022. In light of these circumstances, undersigned counsel has attached hereto a more fulsome statement of supporting facts and law in support of the grounds for relief identified here, and expects to prepare a supplemental memorandum in support of the those identified § 2255 grounds.

5. The issues in this case are novel and complex and need to be thoroughly presented. Because of the nature of the issues herein, it is in Petitioner's best interest to have the undersigned write a thorough and complete brief, which may necessitate additional time and supplementation.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 8, 2022 at Los Angeles, California.

/s/ Carlo Brooks
Carlo Brooks