

THOMAS A. MESEREAU, JR.
 Mesereau Law Group
 10100 Santa Monica Blvd, Suite 300
 Los Angeles, CA 90067
 310-651-9960
 mesereau@mesereaulaw.com

JENNIFER J. WIRSCHING
 1935 Alpha Rd, Suite 216
 Glendale, CA 91208
 424-901-9280
 wirschinglaw@outlook.com

Attorneys for
 ARTUR AYVAZYAN

**UNITED STATES DISTRICT COURT
 FOR THE CENTRAL DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,
Plaintiff,
vs
ATRUR AYVAZYAN,
Defendant.

Case No. 2:20-CR-00579-SVW-3

**MOTION TO MODIFY
 CONDITIONS OF PRETRIAL
 RELEASE TO ALLOW TRAVEL
 BETWEEN DECEMBER 30, 2020
 AND JANUARY 4, 2021**

COMES NOW, Defendant, Artur Ayvazyan by and through counsel Thomas A. Mesereau, Jr. and Jennifer J. Wirsching, and pursuant to the Federal Rules of Criminal Procedure, respectfully request this Honorable Court to modify the terms of Mr. Ayvazyan's pretrial release to allow Mr. Ayvazyan to travel to Snowmass Village, Colorado for a pre-planned family holiday trip. The trip would be with Mr. Ayvazyan's wife, their children, and some of his wife's family. The trip is scheduled from Wednesday, December 30, 2020 to Monday, January 4, 2021.

Mr. Ayvazyan's current conditions of pretrial release include location monitoring. Pretrial services currently does not have the authority to grant this travel due to the location

1 monitoring restrictions which require him to be in his home with exceptions for employment,
2 medical care, attorney visits and court appearances. Pretrial services officer Ochoa has advised
3 me that she does not object to Mr. Ayvazyan going on the trip should this Honorable Court allow
4 it. AUSA Christopher Fenton has advised counsel that the Government takes no position on this
5 request and defers to this Honorable Court.

6
7 Said Motion is based on this introduction, the attached Declaration of Jennifer Wirsching,
8 Esq., and the complete files and records of this action.

9
10 **DECLARATION OF JENNIFER J. WIRSCHING**

- 11 1. I, Jennifer J. Wirsching, an attorney licensed to practice law before all of the courts of
12 the State of California, all federal District Courts in California, the District of
13 Colorado, the Ninth Circuit Court of Appeals, and the Tenth Circuit Court of
14 Appeals, am an attorney of record for Artur Ayvazyan.
- 15 2. On November 6, 2020, Mr. Ayvazyan was put under conditions of pretrial release
16 (Doc. 5).
- 17 3. I have been informed and believe that Mr. Ayvazyan's bond paperwork is completed
18 and has been filed.
- 19 4. The terms of release include location monitoring which requires Mr. Ayvazyan to be
20 in his home except for medical needs, attorney visits, court appearances and
21 employment. These exceptions must be approved by Pretrial Services.
- 22 5. I have been informed and believe that Mr. Ayvazyan would like to take a family trip
23 to Colorado for the New Year's holiday.
- 24
25
26

1 6. The flights are between LAX and ASE (Aspen, Colorado). The outbound flight is on
2 American Airlines 3095, which leaves Wednesday, December 30, 2020. The return
3 flight is on American Airlines flight 3033 on Monday, January 4, 2021. Both flights
4 are direct.

5 7. I have been informed and believe that during the trip Mr. Ayvazyan and his family
6 would stay at the Westin Snowmass Hotel. The hotel is located at 100 Elbert Lane,
7 Snowmass Village, Colorado, 81615.

8
9 8. I spoke to Pretrial Services Officer Ochoa today, and she advised that she has no
10 objection to this request for travel.

11
12 9. I spoke to AUSA Christopher Fenton today, and he advised that the Government
13 takes no position as to this request for travel and would defer to the judgement of this
14 Honorable Court.

15 10. I have personal knowledge of the statements above, unless otherwise indicated as
16 based on information and belief.

17
18 I declare under penalty of perjury that the foregoing is true and correct.

19 December 28, 2020

/S/Jennifer J. Wirsching
Jennifer J. Wirsching
1935 Alpha Rd, Suite 216
Glendale, CA 91208
424-901-9280
wirschinglaw@outlook.com
Attorney for Artur Ayvazyan

For the reasons set forth above respectively requests that this Honorable Court:

1. Modify the terms of Mr. Ayvazyan's pretrial release to allow travel to Snowmass Village, Colorado for a pre-planned Holiday trip from December 30, 2020 to January 4, 2020.

2. GRANT all such other relief as it deems just and proper.

Respectfully Submitted,

/s/ Jennifer J. Wirsching

Jennifer J. Wirsching
1935 Alpha Rd, Suite 216
Glendale, CA 91208
424-901-9280

wirschinglaw@outlook.com

Attorney for Artur Ayvazyan

/s/ Thomas A. Mesereau, Jr.

Mesereau Law Group
10100 Santa Monica Blvd, Suite 300
Los Angeles, CA 90067
310-651-9960

mesereau@mesereaulaw.com

Attorney for Artur Ayvazyan

CERTIFICATE OF SERVICE

I certify that on December 28, 2020, I electronically filed the foregoing document with the clerk of the U.S District Court, Central District of California, using the electronic case filing system of the court to the following parties.

/s/ Jennifer J. Wirsching
Jennifer J. Wirsching
1935 Alpha Rd, Suite 216
Glendale, CA 91208
424-901-9280
wirschinglaw@outlook.com
Attorney for Artur Ayvazyan

Julian L. André
United States Attorney's Office
1100 United States Courthouse
312 North Spring Street
Los Angeles, California 90012
213- 894-6683
Julian.L.Andre@usdoj.gov