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

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICHARD AYVAZYAN,
MARIETTA TERABELIAN,
ARTUR AYVAZYAN,
TAMARA DADYAN,
et al.,

Defendants.

Case No. 20-cr-579 (SVW)

**DECLARATION OF ASHWIN J.
RAM IN SUPPORT OF MOTION
TO EXCLUDE DIGITAL DEVICE
FILES**

Hon. Stephen V. Wilson

Current Hearing Date: June 21, 2021
Requested Hearing Date: June 14, 2021
Time: 11:00 a.m.

1 I, Ashwin J. Ram, declare as follows:

2 1. I am an attorney licensed to practice law in the state of California. I am a
3 partner at the law firm of Steptoe & Johnson LLP and counsel of record for defendant
4 Richard Ayvazyan in the above-captioned matter.

5 2. A true and correct copy of the search warrant for the November 5, 2020
6 search of Richard Ayvayzan and Marietta Terabelian's home, produced in discovery as
7 DOJ_PROD_0000002626, is attached hereto as **Exhibit A**.

8 3. A true and correct copy of the search warrant for the November 5, 2020
9 search of Artur Ayvayzan and Tamara Dadyan's home, produced in discovery as
10 DOJ_PROD_0000002894, is attached hereto as **Exhibit B**.

11 4. A true and correct copy of the government's *ex parte* application for an
12 extension of time is attached hereto as **Exhibit C**. This document was produced in
13 discovery on May 13, 2021 as DOJ_PROD_0000162873.

14 5. A true and correct copy of the government's *ex parte* application to seal its
15 extension request is attached hereto as **Exhibit D**. This document was produced in
16 discovery on May 13, 2021 as DOJ_PROD_0000162894.

17 6. True and correct copies of three FD-302 memoranda from the FBI,
18 produced in discovery as DOJ_PROD_0000153655, DOJ_PROD_0000153807, and
19 DOJ_PROD_0000153808, are attached hereto as **Exhibit E**. The documents have been
20 redacted in compliance with electronic filing rules.

21 7. A true and correct copy of the government's February 1, 2021 discovery
22 production cover letter is attached hereto as **Exhibit F**.

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

24 Executed at Los Angeles, California on May 24, 2021.

25 Respectfully submitted,

26 /s/ Ashwin J. Ram

27 Ashwin J. Ram

28 *Counsel for Defendant Richard Ayvazyan*