

EXHIBIT 10



United States Department of Justice

United States Attorney's Office
Central District of California

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BY EMAIL

April 26, 2021

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Re: United States v. Ayvazyan et. al.
No. CR 2:20-cr-00579-SVW

Dear Counsel:

We write to you concerning materials seized from the residences of your respective clients, Richard Ayvazyan, Marietta Terabelian, Artur Ayvazyan and Tamara Dadyan, pursuant to federal search warrants 2:20-mj-5282 and 2:20-mj-5286, executed on November 5, 2020. As the government previously explained, certain of the digital devices that the government obtained from the execution of these search warrants (e.g., smartphones, computers, and removable storage media), were provided to the government's filter team for a privilege review.¹

¹ As the government previously explained, certain of the digital devices that the government obtained from the execution of these search warrants – namely routers, modems, a

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We understand that the filter team has reviewed the data obtained from certain of these digital devices, and the filter team provided to the prosecution team the data that the filter team determined not to be potentially privileged in the form of Cellebrite reports or reviewable load files. The prosecution team, in turn, has produced all of those filtered Cellebrite reports and reviewable load files that are discoverable and in its possession to defense counsel in the criminal case, all of whom are copied on this correspondence.

We further understand that the filter team is completing its filter of four additional digital devices, described in Exhibit A attached hereto, and will provide to the prosecution team the data that the filter team determines not to be potentially privileged in the form of Cellebrite reports. The prosecution team, in turn, will produce these four filtered Cellebrite reports to defense counsel in the criminal case, all of whom are copied on this correspondence. These four Cellebrite reports will be produced in addition to the complete forensic copy of these four digital devices, which, as you know, the government previously produced to you (counsel for the original four defendants) on February 1, 2021.

We also understand that there are additional materials that the filter team has not reviewed and therefore has made no determination as to whether they are privileged, namely data obtained from various digital devices that have been imaged but not reviewed. These additional materials have not been released to the prosecution team and thus will not be used by the prosecution team in its case-in-chief in this matter. It is also our understanding that the filter team does not intend to continue reviewing these additional materials for privilege. These digital devices are listed in the attached Exhibit B, and we understand the FBI will be returning each listed device to counsel for its respective owner.

As we previously explained to you, we also understand that there are several digital devices that CART could not access for imaging or review. These additional materials will not be used by the prosecution team in its case-in-chief in this matter. It is also our understanding that no further efforts will be undertaken by CART to access these devices. The digital devices that CART could not access for imaging or review are listed in the attached Exhibit C. We understand the FBI will be returning each listed device to counsel for its respective owner.

As you know, the government already provided to you, as counsel for the original four defendants in this case, a complete forensic image of all of the digital devices that could be accessed and imaged based on your December 11, 2020, joint-letter stating that “each defendant provides a limited consent that their electronic data may be shared with the other three defendants currently in the case for the purposes of their defense in this case.” Thus, with respect to all of the digital devices provided to the filter team, including the digital devices listed in Exhibits A and B, you have already received a complete forensic image of those devices, and you will now receive back the underlying devices reflected in Exhibit B as well. As for the encrypted and damaged devices listed in Exhibit C that could not be accessed or imaged, as

cable box, and GPS devices – were separately provided to and analyzed by the FBI’s Computer Analysis and Response Team (CART). (See Mar. 26, 2021 Letter; Apr. 9, 2021 Letter.)

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explained above, the government will be returning each such device to counsel for its respective owner.

We have also copied counsel for defendants Manuk Grigoryan, Arman Hayrapetyan, Edvard Paronyan, and Vahe Dadyan, so that they may respond by May 3, 2021, if they have any objection to this procedure.

Separately, to the extent the filter team has withheld from the prosecution team documents belonging to your respective clients that are potentially privileged, the filter team will be contacting you shortly about those documents.

Very truly yours,

Satt Radd

SCOTT PAETTY
Assistant United States Attorney
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Christopher Fenton
Trial Attorney
Department of Justice
Criminal Division

Enclosure

Cc (via email): John Hanusz, Counsel for Manuk Grigoryan
Jilbert Tahmazian, Counsel for Arman Hayrapetyan
Michael Freedman, Counsel for Edvard Paronyan
Peter Johnson, Counsel for Vahe Dadyan

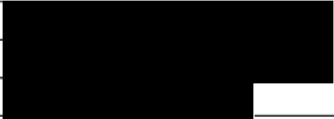
Exhibit A

Evidence Item No.	Description	Place of Seizure
1B17	Apple iPhone	
1B21	Apple iPhone	
1B81	Apple iPhone	
1B85	Apple iPhone	

Exhibit B

Evidence Item No.	Description	Place of Seizure
1B18	Apple iPhone	
1B20	Samsung Tablet	
1B37	Mac Book	
1B40	HP Computer	
1B41	Removable Storage Media	
1B75	Removable Storage Media	
1B77	Black Computer Tower	
1B79	Apple iPhone	
1B80	Apple iPhone	
1B82	Apple iPhone	
1B83	Apple iPhone	
1B94	Vertu Phone	
1B96	Apple iPhone	
1B121	CYBERPOWER PC Model C	
1B122	HP Slimline 260	
1B130	Apple iPhone	
1B131	Apple iPhone	
1B132	Apple iPhone	
1B133	Samsung Cell Phone	
1B134	Samsung Cell Phone	
1B135	Samsung Cell Phone	
1B136	AT&T Flip Phone	
1B137	AT&T Flip Phone	
1B138	AT&T Flip Phone	

Exhibit C

Evidence Item No.	Description	Place of Seizure
1B27	Apple iPad	
1B38	HP Laptop Computer	
1B78	White Router 323-10888-01	