

EXHIBIT 11

**United States Department of Justice****United States Attorney's Office
Central District of California**

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April 30, 2021

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No. CR 2:20-cr-00579-SVW
Discovery Production Volume 21

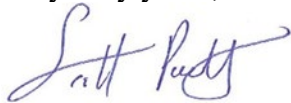
Dear Counsel:

Pursuant to your clients' requests for discovery and the Court's protective order (see CR 92), enclosed please find a USB drive with discovery bearing Bates Number DOJ_PROD_0000160625 to DOJ_PROD_0000160628¹. As detailed in the attached index, this production includes Cellebrite reports containing information from four of the digital devices for which the government previously produced a forensic copy to counsel for the four original defendants (namely, Richard Ayvazyan, Marietta Terabelian, Artur Ayvazyan, and Tamara Dadyan). As we previously explained to you, this data was reviewed by an independent filter team before it was made available to the prosecution team. As part of that review process, the filter team withheld any potentially privileged information it identified as part of its review. The data in this production therefore may contain less information than the forensic copy already produced to counsel for the four original defendants. The data is not separately being uploaded to Steptoe & Johnson's file sharing system or USAfx due to size limitations.

As with prior productions, the enclosed materials, and any future discovery provided to you, may exceed the scope of discovery mandated by the Federal Rules of Criminal Procedure, federal statute, or relevant case law, and are thus provided voluntarily and solely as a matter of discretion. By producing such materials to you, the government does not waive its right to object to any future discovery requests beyond the ambit of its legal obligations.

Please let me know if you have any questions.

Very truly yours,



SCOTT PAETTY
Assistant United States Attorney
Major Frauds Section



Christopher Fenton
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¹ The password to access the discovery materials will be emailed to you separately.

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Enclosure

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Description	Production BEGDOC	Production ENDDOC
Cellebrite Report (1B85)	DOJ PROD 0000160625	DOJ PROD 0000160625
Cellebrite Report (1B21)	DOJ PROD 0000160626	DOJ PROD 0000160626
Cellebrite Report (QLA5 AJ 1B17)	DOJ PROD 0000160627	DOJ PROD 0000160627
Cellebrite Report (1B81)	DOJ PROD 0000160628	DOJ PROD 0000160628