

EXHIBIT 12

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

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BY FEDEX & EMAIL

May 26, 2021

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RE: United States v. Ayvazyan et. al

May 26, 2021

Page 2

Re: United States v. Ayvazyan et. al,
No. CR 2:20-cr-00579-SVW
Discovery Production – Seized Materials

Dear Counsel:

We write with respect to the following digital devices:

- 1B17 – Artur Ayvazyan’s iPhone
- 1B21 – Tamara Dadyan’s iPhone
- 1B81 – Marietta Terabelian’s iPhone
- 1B85 – Richard Ayvazyan’s iPhone

On February 1, 2021, the government produced a complete forensic copy of each of the above-listed iPhones to counsel for defendants Richard Ayvazyan, Marietta Terabelian, Tamara Dadyan, and Artur Ayvazyan. As you know, an independent filter team then generated a Cellebrite report for each of these iPhones and conducted an independent review for potentially privileged materials. Upon the independent filter team’s completion of its review of each of the Cellebrite reports for the above-listed iPhones, the independent filter team released a redacted copy of the Cellebrite reports to the prosecution team and the prosecution team, in turn, produced them to you. The redacted copy of the Cellebrite reports for the above-listed iPhones were produced to counsel for all defendants on April 30, 2021. Members of the prosecution team then conducted a review of the redacted Cellebrite reports for the above-listed iPhones to identify the materials that are within the scope of the applicable search warrants that would be seized. Although the deadline to complete the responsiveness review for these iPhones is July 3, 2021, the review has been completed five and a half weeks early.

Pursuant to your clients’ requests for discovery and the Court’s protective order (see CR 92), enclosed please find a disc with discovery bearing Bates Numbers DOJ_PROD_0000163654 to DOJ_PROD_0000163657 and an attached index.¹ These discovery materials include the materials from the above-listed iPhones that the prosecution team has seized pursuant to the applicable search warrants. This is a subset of the discovery that was previously produced to you. These discovery materials are also being uploaded to Steptoe & Johnson’s file sharing system and USAfx, as some of you have requested.

The prosecution team is reviewing these materials to determine what materials from these iPhones will be used as trial exhibits at trial. The prosecution team will disclose those trial exhibits on June 1, 2021, pursuant to the Court’s April 16, 2021 order (CR 284).

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

RE: United States v. Ayvazyan et. al

May 26, 2021

Page 3

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,

A handwritten signature in blue ink, appearing to read "Scott Paetty".

SCOTT PAETTY
CATHERINE AHN
Assistant United States Attorneys
Major Frauds Section

A handwritten signature in black ink, appearing to read "Christopher Fenton".

Christopher Fenton
Trial Attorney
Department of Justice
Criminal Division

Enclosure

United States v. Ayvazyan et al.
Discovery Production – Seized Materials
Index

Description	Production BEGDOC	Production ENDDOC
1B17 – Reproduced Celebrite Report	DOJ PROD 0000163654	DOJ PROD 0000163654
1B21 – Reproduced Celebrite Report	DOJ PROD 0000163655	DOJ PROD 0000163655
1B81 – Reproduced Celebrite Report	DOJ PROD 0000163656	DOJ PROD 0000163656
1B85 – Reproduced Celebrite Report	DOJ PROD 0000163657	DOJ PROD 0000163657