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Counsel for Defendant Richard Ayvazyan

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICHARD AYVAZIAN,
et al.,

Defendants.

Case No. 20-cr-579 (SVW)

**DECLARATION OF ASHWIN J.
RAM IN SUPPORT OF
OPPOSITION TO
GOVERNMENT'S MOTION TO
REDACT SUPERSEDING
INDICTMENT FOR USE AT TRIAL
(DKT. 422) AND CROSS-MOTION
TO STRIKE PARAGRAPHS 10-18
OF THE SUPERSEDING
INDICTMENT**

Judge: Hon. Stephen V. Wilson

Date: June 15, 2021

Time: 8:30 a.m.

**DECLARATION OF A. RAM IN SUPPORT OF OPPOSITION TO TRIAL
INDICTMENT AND CROSS-MOTION TO STRIKE**

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. On the evening of Wednesday, May 26, 2021, counsel for defendant
6 Richard Ayvazyan sent a draft set of proposed jury instructions to the government for
7 their consideration. Those instructions contained a proposed instruction related to
8 multiple conspiracies. Based on the Ninth Circuit Model Jury Instructions, the
9 proposed multiple conspiracies instruction would inform the jury in relevant part that
10 "If you find that the single conspiracy to commit wire fraud and bank fraud charged in
11 Count 1 did not exist, then you must return a not guilty verdict, even though you may
12 find that some other conspiracy existed." A true and correct copy of the May 26, 2021
13 email transmitting those instructions is attached as **Exhibit A**.

14 3. A true and correct copy of a May 27, 2021 email from the government,
15 proposing for the first time to redact Paragraph 32 from the Superseding Indictment for
16 use at trial, is attached as **Exhibit B**.

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

18 Executed at Los Angeles, California on June 7, 2021.

19 Respectfully submitted,

20 /s/ Ashwin J. Ram

21 Ashwin J. Ram

22 *Counsel for Defendant Richard Ayvazyan*
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