

EXHIBIT A

From: Keough, Michael
Sent: Wednesday, May 26, 2021 10:34 PM
To: Fenton, Christopher (CRM); Paetty, Scott (USACAC); Ahn, Catherine S. (USACAC)
Cc: David Diamond; George Mgdesyan; John Littrell; Law offices of Fred G. Minassian, Inc.; Newcomer, Meghan; Ryan V. Fraser; Wirschinglaw@outlook.com; john@hanuszlaw.com; mesereau@mesereaulaw.com; Peter Johnson; Ram, Ashwin; Silverman, Nicholas
Subject: US v. Ayvazyan et al - Jury Instructions
Attachments: Proposed Joint Defense Jury Instructions-c2.DOCX

Dear Counsel:

Please find attached a set of proposed defense jury instructions on behalf of all defendants except Arman Hayrapetyan (whose position on the proposed instructions we do not know). These are not yet finalized, but we are providing a draft to you at this stage. Where the proposed defense instructions are different from the government's, we have highlighted that language in yellow. We are available to meet and confer tomorrow if you would like to discuss the defense's proposed instructions.

Given that the Court has asked for the instructions by tomorrow, we would propose that the government file its instructions as being proposed by the government, and the defense file its instructions as being proposed by the defense. This will allow the Court to consider instructions from the two sets (as opposed to a set from each defendant as well as the government).

Best,
Mike

Michael A. Keough
Associate
Admitted in California and New York
mkeough@Step toe.com
+1 415 365 6717 direct | +1 415 365 6699 fax

Step toe
Step toe & Johnson LLP
One Market Plaza | Spear Tower, Suite 3900 | San Francisco, CA 94105
www.step toe.com

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