

EXHIBIT B

From: Ahn, Catherine S. (USACAC) <Catherine.S.Ahn@usdoj.gov>
Sent: Thursday, May 27, 2021 2:24 AM
To: Fenton, Christopher (CRM); Ram, Ashwin; Silverman, Nicholas; Keough, Michael; Law offices of Fred G. Minassian, Inc.; David Diamond; John Littrell; mesereau@mesereaulaw.com; Wirschinglaw@outlook.com; john@hanuszlaw.com; peter@peterjohnsonlaw.com; jilbert@jilbertlaw.com; rfraser@bklwlaw.com; michael@thefreedmanfirm.com; George Mgdesyan
Cc: Fenton, Christopher (CRM); Paetty, Scott (USACAC)
Subject: Trial Indictment
Attachments: Ayvazyan Trial Indictment_Redacted.pdf

Counsel:

The government intends to proceed to trial on a trial indictment that (a) removes paragraph 32 and renumbers the remaining paragraphs; (b) deletes the phrase “devised, participated in, and” from lines 11 and 12 in paragraph 60; and (c) adds the sub-title “trial indictment” to the first page.

For ease of reference, I have redacted paragraph 32 and the relevant phrase in paragraph 60 from the First Superseding Indictment, attached. We would remove that language, renumber, and add the title to a clean version. Please advise by the end of the day your client’s position with respect to our anticipated motion to proceed on a trial indictment with the changes described.

Sincerely,

Catherine S. Ahn | Assistant United States Attorney
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🌐 <https://www.justice.gov/usao-cdca>