

EXHIBIT H

BY FEDEX & EMAIL

February 1, 2021

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Counsel for Marietta Terabelian

Re: United States v. Ayvazyan et. al.
No. CR 2:20-cr-00579-SVW

Dear Counsel:

Pursuant to your clients' requests for discovery and the Court's protective order (see CR 92), enclosed please find an external hard-drive containing forensic copies of the following digital devices seized in connection with the government's investigation:

Thomas A. Mesereau, Jr. (*w/o enclosures*)
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Counsel for Artur Ayvazyan

Fred G. Minassian (*w/o enclosures*)
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Counsel for Tamara Dadyan

1. One Blue/Black AT&T Flip Phone, seized from [REDACTED] Weddington St.
2. One Black Glossy AT&T Flip Phone, seized from [REDACTED] Weddington St.
3. One Blue/Black AT&T Flip Phone, seized from [REDACTED] Weddington St.
4. One Grey Samsung Verizon Flip Phone, seized from [REDACTED] Weddington St.
5. One Samsung cell phone, seized from [REDACTED] Weddington St.
6. One Samsung cell phone, seized from [REDACTED] Weddington St.
7. One black iPhone, seized from [REDACTED] Weddington St.
8. One black iPhone, seized from [REDACTED] Weddington St.
9. One black iPhone, seized from [REDACTED] Weddington St.
10. One black iPhone, seized from [REDACTED] Topeka Ave.
11. One Vertu Phone, seized from [REDACTED] Topeka Ave.
12. One black iPhone, seized from [REDACTED] Topeka Ave.
13. One teal iPhone, seized from [REDACTED] Topeka Ave.
14. One Navy Blue iPhone, seized from [REDACTED] Topeka Ave.
15. One light green iPhone, seized from [REDACTED] Topeka Ave.
16. One white iPhone, seized from [REDACTED] Topeka Ave.
17. One black iPhone, seized from [REDACTED] Topeka Ave.
18. One cell phone, seized from [REDACTED] Weddington St.
19. One Samsung Tablet, seized from [REDACTED] Weddington St.
20. Two flash drives, seized from [REDACTED] Weddington St.

Copies of these digital devices are being provided to all four defendants in this case based on your December 11, 2020, joint-letter stating that “each defendant provides a limited consent that their electronic data may be shared with the other three defendants currently in the case for the purposes of their defense in this case.” Please let us know immediately if you have any difficulties accessing the copies of the digital devices.

Additionally, the FBI is working diligently to image the remaining digital devices that were seized in connection with this investigation. We will produce copies to you on a rolling basis as soon as copies of the devices are available. However, please note that many of the remaining digital devices are encrypted, damaged, or are otherwise inaccessible at this time. It will take the FBI longer to access any encrypted or damaged digital devices and produce forensic copies of those devices to the defense.

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.

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Please let me know if you have any questions.

Very truly yours,

A handwritten signature in blue ink, reading "Julian André". The signature is written in a cursive, flowing style.

JULIAN L. ANDRÉ
Assistant United States Attorney
Major Frauds Section

cc: Christopher Fenton, Department of Justice Trial Attorney

Enclosure