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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
DEFENDANTS' NOTICE OF
MOTION AND MOTION IN
LIMINE TO PRECLUDE
SUMMARY WITNESS**

Judge: Hon. Stephen V. Wilson
Hearing Date: June 14, 2021
Time: 11:00 a.m.

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. Attached as **Exhibit A** is a true and correct copy of the government's May
6 18, 2021 letter to defense counsel.

7 3. Attached as **Exhibit B** is a true and correct copy of a May 24, 2021 email
8 exchange between the government and defense counsel.

9 4. Attached as **Exhibit C** is a true and correct copy of the transcript of the
10 Status Conference Hearing held on May 21, 2021 in the above-captioned matter,
11 obtained from the Court Reporter.

12 5. Attached as **Exhibit D** is a true and correct copy of the government's
13 Summary Chart Exhibit re Tracing, emailed to defense counsel on June 1, 2021, with
14 street address numbers redacted.

15 6. Attached as **Exhibit E** is a true and correct copy of the government's
16 Summary Chart Exhibit re COVID-19 Disaster Relief Loan Application, emailed to
17 defense counsel on June 1, 2021, with dates of birth and street address numbers
18 redacted.

19 7. Attached as **Exhibit F** is a true and correct copy of the government's June
20 1, 2021 email to defense counsel regarding summary chart exhibits.

21 8. Attached as **Exhibit G** is a true and correct copy of a June 5, 2021 email
22 exchange between the government and defense counsel.

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

24 Executed at Los Angeles, California on June 8, 2021.

25 Respectfully submitted,

26 /s/ Ashwin J. Ram
27 Ashwin J. Ram

28 *Counsel for Defendant Richard Ayvazyan*