

EXHIBIT A

**United States Department of Justice****United States Attorney's Office
Central District of California**

Scott Paetty
Phone: (213) 894-6527
E-mail: Scott.Paetty@usdoj.gov

1100 United States Courthouse
312 North Spring Street
Los Angeles, California 90012

BY EMAIL

May 18, 2021

Ashwin J. Ram
Michael A. Keough
Nicholas P. Silverman
Steptoe & Johnson LLP
1330 Connecticut Avenue, NW
Washington, DC 20036

Counsel for Richard Ayvazyan

David D. Diamond
Diamond and Associates
3500 West Olive Avenue
Suite 300
Burbank, California 91505

John Lewis Littrell
Bienert Katzman PC
903 Calle Amanecer Suite 350
San Clemente, CA 92673

Counsel for Marietta Terabelian

Thomas A. Mesereau, Jr.
Mesereau Law Group
10100 Santa Monica Boulevard Suite 300
Los Angeles, CA 90067

Jennifer J. Wirsching
Attorney at Law
1935 Alpha Road Suite 216
Glendale, CA 91208

Counsel for Artur Ayvazyan

Fred G. Minassian
Law Offices of Fred G. Minassian, Inc.
101 N. Brand Blvd., Suite 1970
Glendale, CA 91203

Counsel for Tamara Dadyan

John David Hanusz
Hanusz Law, PC
800 Wilshire Blvd, Ste 1050
Los Angeles, CA 90017-2672

Counsel for Manuk Grigoryan

Jilbert Tahmazian
Tahmazian Law Firm, P.C.
1518 West Glenoaks Boulevard
Glendale, CA 91201

Counsel for Arman Hayrapetyan

Michael Freedman
The Freedman Firm
800 Wilshire Blvd., Suite 1050
Los Angeles, CA 90017

Counsel for Edvard Paronyan

Peter Johnson
Peter Johnson Law
409 North Pacific Coast Hwy, 651
Redondo Beach, California 90277

Counsel for Vahe Dadyan

RE: United States v. Ayvazyan et. al
May 18, 2021
Page 2

Re: United States v. Ayvazyan et. al,
No. CR 2:20-cr-00579-SVW
Notice re: Summary Witness

Dear Counsel:

The government hereby provides notice of its intention to call Marylee Robinson, Managing Director at Stout Risius Ross, LLC, as a summary witness to provide testimony at trial about certain financial transactions. The government does not intend to qualify Ms. Robinson as an expert, and it does not believe that any of her testimony would implicate Federal Rules of Evidence 702, 703, and/or 705 or Federal Rule of Criminal Procedure 16(a)(1)(G).

The government anticipates calling Ms. Robinson to testify about, among other things, her analysis of relevant financial transactions. Ms. Robinson will base her testimony primarily upon a review of bank and brokerage account records, as well as accounting and other business records from escrow companies and vendors, which previously have been provided to the defendants in discovery.

Among other things, Ms. Robinson will identify the accounts at various banks and brokerages used by the defendants and their co-conspirators, including the bank and brokerage accounts referenced in the First Superseding Indictment. She will describe flows of funds into, out of, and between these and other accounts, including to trace the use of Paycheck Protection Program (PPP) and Economic Injury Disaster Loan (EIDL) loan proceeds that were deposited or transferred into these and other accounts.

The government anticipates that Ms. Robinson will use a variety of summary charts pursuant to Federal Rule of Evidence 1006 to explain these transactions to the jury. The government is amenable to providing drafts of these charts to you prior to trial upon receipt of a signed summary chart agreement (see attached).

This disclosure is not intended to exclude other areas of potential testimony that the government may elicit from Ms. Robinson; rather, it is intended to identify certain areas about which she is likely to testify as a summary witness on direct examination.

The government reserves the right to provide further notice of other summary witnesses whom it may call to testify at trial or summary exhibits it may intend to use.

Please let us know by Friday, May 21, 2021, if you have any objections to this notice or believe it deficient in any way, including, for example, if you object to the government's position that Ms. Robinson need not be qualified as an expert.

Please let me know if you have any questions, or would like to further discuss any of the matters raised above.

RE: United States v. Ayvazyan et. al

May 18, 2021

Page 3

Very truly yours,

A handwritten signature in blue ink, appearing to read "Scott Paetty".

SCOTT PAETTY
Assistant United States Attorney
Major Frauds Section

A handwritten signature in black ink, appearing to read "Christopher Fenton".

Christopher Fenton
Trial Attorney
Department of Justice
Criminal Division

Enclosure

AGREEMENT RE: SUMMARY CHART DRAFTS IN 20-cr-579(A)-SVW

On behalf of my client, _____, I agree that in exchange for the government's early voluntary production of drafts of summary charts to be used at trial in the above-titled case, neither I nor my client, nor any attorney subsequently retained or appointed to represent my client in this case, will use the draft charts (as opposed to any different finalized charts that are prepared for and/or used by the government in official proceedings in this case) for any purpose in any official proceeding in this case, including but not limited to cross-examining any witness at trial, presenting the drafts as charts whose accuracy was vouched for by the government, and/or using the drafts at sentencing if my client is convicted. If the government does not prepare finalized summary charts in the above-titled case, this agreement permits defense counsel, the client, or any attorney subsequently retained or appointed to represent the client in this case to use at sentencing the draft summary charts prepared by the government. I further acknowledge and agree that this agreement is entered into with the express understanding by both parties that any summary chart which has been designated as a "draft" has not been subject to final review by the government. Nothing in this agreement shall preclude _____ [DEFENDANT] from objecting to the testimony, in whole or in part, of any government witness who references a summary chart or to any individual piece of demonstrative or summary material that such witness may prepare and offer at trial.

Date

Counsel for defendant

Please return to AUSAs Scott Paetty or Catherine Ahn by email at scott.paetty@usdoj.gov or catherine.ahn@usdoj.gov, or fax at 213-894-6269.