

EXHIBIT F

From: Fenton, Christopher (CRM) <Christopher.Fenton@usdoj.gov>
Sent: Tuesday, June 1, 2021 10:52 PM
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Cc: Paetty, Scott (USACAC); Ahn, Catherine S. (USACAC); Paul, Annamelda (CRM)
Subject: US v. Ayvazyan et al., No. CR 20-579-SVW - Summary Chart Exhibits FRE 1006
Attachments: Summary Chart Exhibits re Tracing (Draft for Circulation) (06.02.2021).pdf; Summary Chart Exhibit re COVID-19 Disaster Relief Loan Application (Draft for Circulation) (06.02.2021).pdf

Counsel –

For your review, here are two draft sets of summary chart exhibits that the government plans to use at trial pursuant to FRE 1006. In order to provide notice and for ease of reference, the government is identifying these summary chart exhibits as trial exhibits and providing a draft copy to you separate and apart from the trial exhibit list. The government nevertheless considers these summary charts to be on the government's trial exhibit list for the upcoming trial.

The first set of charts summarizes information from the many COVID-19 disaster relief loan applications submitted by the defendants in this case. The second set of charts summarizes the flow of those funds from those loans through bank and brokerage accounts owned and controlled by the defendants. Please let us know by 6pm Pacific on Thursday, June 3 whether you have any objections to the attached summary chart exhibits.

The government provides its trial exhibit list with the following caveats.

The government reserves: (1) the right to develop demonstrative exhibits based on the attached list of exhibits and content (the government will provide prior notice of a demonstrative exhibit to defense prior to presenting it to the jury); (2) the right to refresh a witness's recollection with exhibits not listed in here; (3) the right to change layout/presentation as needed for technology or other presentation purposes but underlying content remains the same; (4) the right to remove information from summary exhibits or correct information, as needed; (5) the right to not seek admission of all the information in the list; (6) to use additional information not listed in rebuttal or to respond to challenges as to the content; (7) to the extent physical exhibits are included, the right to replace or supplement the physical exhibits with digital representations of them, as needed (the government will provide prior notice of any digital representations of the physical exhibit will be provided to defense prior to presentation to the jury and, as always, will make the physical exhibit available for inspection upon request).

Thank you.

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