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16 Attorneys for Plaintiff
17 UNITED STATES OF AMERICA

18 UNITED STATES DISTRICT COURT

19 FOR THE CENTRAL DISTRICT OF CALIFORNIA

20 UNITED STATES OF AMERICA,

21 Plaintiff,

22 v.

23 RICHARD AYVAZYAN,
aka "Richard Avazian" and
"Iuliia Zhadko,"
24 MARIETTA TERABELIAN,
aka "Marietta Abelian" and
25 "Viktoria Kauichko,"
ARTUR AYVAZYAN,
26 aka "Arthur Ayvazyan," and
TAMARA DADYAN,
27 MANUK GRIGORYAN,
aka "Mike Grigoryan," and
28 "Anton Kudiumov,"

No. CR 20-00579 (A) -SVW

STIPULATION REGARDING
INTERSTATE WIRE TRANSFERS

1 ARMAN HAYRAPETYAN,
2 EDVARD PARONYAN,
3 aka "Edvard Paronian" and
4 "Edward Paronyan," and
5 VAHE DADYAN,

6 Defendants.

7 Plaintiff United States of America, by and through its
8 counsel of record, the Acting United States Attorney for the
9 Central District of California, Assistant United States
10 Attorneys Scott Paetty, Catherine Ahn, Brian Faerstein, and
11 Department of Justice Trial Attorney Christopher Fenton, and
12 defendant Richard Ayvazyan, individually and by and through his
13 counsel of record Ashwin J. Ram; defendant Marietta Terabelian,
14 individually and by and through her counsel of record John Lewis
15 Littrell; defendant Artur Ayvazyan, individually and by and
16 through his counsel of record Thomas A. Mesereau, Jr. and
17 Jennifer J. Wirsching; defendant Tamara Dadyan, individually and
18 by and through her counsel of record Fred G. Minassian;
19 defendant Arman Hayrapetyan, individually and by and through his
20 counsel of record Jilbert Tahmazian; hereby agree and stipulate
21 as follows:

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STIPULATION AS TO INTERSTATE WIRES

1. This stipulation solely relates to the fact that certain wires actually traveled in interstate commerce. It does not include an agreement regarding whether the defendants knew these wires occurred or knew that these wires traveled in interstate commerce, or that either fact was foreseeable. It also does not include an agreement regarding whether these wires were in furtherance of the scheme alleged by the government.
2. A wire transfer of \$182,637.00, sent on May 1, 2020, from WebBank to a JPMorgan Chase, N.A. account in the name of Sabala Construction, was a wire transmission that traveled in interstate commerce from Utah to California.
3. A wire transfer of \$124,000.00, sent on May 5, 2020, from Cross River Bank to a U.S. Bank account in the name of Allstate Towing and Transport LLC, was a wire transmission that traveled in interstate commerce from New Jersey, Pennsylvania, or Texas to Kansas.
4. A wire transfer of \$130,000.00, sent on May 7, 2020, from Celtic Bank to a Wells Fargo Bank, N.A. account in the name of Iuliia Zhadko dba Top Quality Contracting, was a wire transmission that traveled in interstate commerce from Utah to Minnesota.
5. A wire transfer of \$137,500.00, sent on May 11, 2020, from Comerica Bank to a Comerica Bank account in the name of Secureline Realty and Funding, Inc., was a wire transmission that traveled in interstate commerce from Ohio to California.

- 1 6. A wire transfer of \$130,187.00, sent on May 8, 2020, from
2 Celtic Bank to a JPMorgan Chase, N.A. account in the name
3 of Redline Auto Collision Inc., was a wire transmission
4 that traveled in interstate commerce from Utah to
5 California.
- 6 7. A wire transfer of \$157,500.00, sent on May 19, 2020,
7 from Celtic Bank to a Wells Fargo Bank, N.A. account in
8 the name of Voyage Limo LLC, was a wire transmission that
9 traveled in interstate commerce from Utah to Minnesota.
- 10 8. A wire transfer of \$149,900.00, sent on June 16, 2020,
11 from the United States Small Business Administration
12 ("SBA") to a U.S. Bank account in the name of G&A
13 Diamonds, was a wire transmission that traveled in
14 interstate commerce from Colorado to Missouri to New
15 Jersey to Colorado.
- 16 9. A wire transfer of \$150,000.00, sent on June 17, 2020,
17 from a JPMorgan Chase, N.A. account in the name of
18 Redline Auto Collision Inc. to a Bank of America, N.A.
19 account in the name of Marietta Terabelian, was a wire
20 transmission that traveled in interstate commerce from
21 California to Pennsylvania or Texas to California.
- 22 10. A wire transfer of \$149,900.00, sent on June 22, 2020,
23 from the SBA to a Radius Bank (a/k/a LendingClub Bank)
24 account in the name of Timeline Transport, Inc., was a
25 wire transmission that traveled in interstate commerce
26 from Colorado to Missouri to New Jersey to Massachusetts.
- 27 11. A wire transfer of \$384,100.00, sent on July 31, 2020,
28 from Capital One, N.A. to a Radius Bank account in the

1 name of Mod Interiors, Inc., was a wire transmission that
2 traveled in interstate commerce from Illinois or Virginia
3 to Arkansas to Georgia to Massachusetts.

4 12. The submission of a PPP loan application on August 13,
5 2020, to Newtek Small Business Finance in the name of
6 Anna Dzukaeva, was a wire transmission that traveled in
7 interstate commerce from California to Arizona.

8 13. This stipulation is being entered into freely and
9 voluntarily by all parties.

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The parties agree and stipulate that this stipulation be entered into evidence at the trial in this matter.

DATED: June 14, 2021

Respectfully submitted,

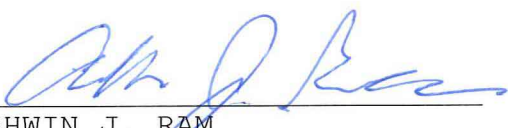
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UNITED STATES OF AMERICA

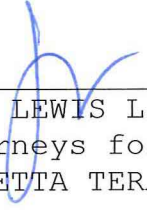
DATED: June 14, 2021


ASHWIN J. RAM
Attorney for Defendant
RICHARD AYVAZYAN

DATED: June 14, 2021


RICHARD AYVAZYAN

DATED: June 14, 2021


JOHN LEWIS LITTRELL
Attorneys for Defendant
MARIETTA TERABELIAN

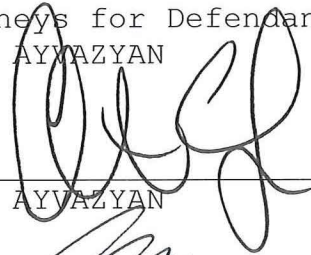
DATED: June 14, 2021


MARIETTA TERABELIAN

1 DATED: June 14, 2021


THOMAS A. MESEREAU, JR.
JENNIFER J. WIRSCHING
Attorneys for Defendant
ARTUR AYVAZIAN

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5 DATED: June 14, 2021


ARTUR AYVAZIAN

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8 DATED: June 14, 2021


FRED G. MINASSIAN
Attorney for Defendant
TAMARA DADYAN

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10
11 DATED: June 14, 2021


TAMARA DADYAN

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14
15 DATED: June __, 2021

JILBERT TAHMAZIAN
Attorney for Defendant
ARMAN HAYRAPETYAN

16
17
18 DATED: June __, 2021

ARMAN HAYRAPETYAN