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UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. RICHARD AYVAZYAN, aka "Richard Avazian" and "Iuliia Zhadko," MARIETTA TERABELIAN, aka "Marietta Abelian" and "Viktoria Kauichko," ARTUR AYVAZYAN, aka "Arthur Ayvazyan," and TAMARA DADYAN, MANUK GRIGORYAN, aka "Mike Grigoryan," and "Anton Kudiumov,"	No. CR 20-00579(A)-SVW <u>STIPULATION REGARDING INTERSTATE WIRE TRANSFERS</u>

ARMAN HAYRAPETYAN,
EDVARD PARONYAN,
aka "Edvard Paronian" and
"Edward Paronyan," and
VAHE DADYAN,

Defendants.

Plaintiff United States of America, by and through its counsel of record, the Acting United States Attorney for the Central District of California, Assistant United States Attorneys Scott Paetty, Catherine Ahn, Brian Faerstein, and Department of Justice Trial Attorney Christopher Fenton, and defendant Richard Ayvazyan, individually and by and through his counsel of record Ashwin J. Ram; defendant Marietta Terabelian, individually and by and through her counsel of record John Lewis Littrell; defendant Artur Ayvazyan, individually and by and through his counsel of record Thomas A. Mesereau, Jr. and Jennifer J. Wirsching; defendant Tamara Dadyan, individually and by and through her counsel of record Fred G. Minassian; defendant Arman Hayrapetyan, individually and by and through his counsel of record Jilbert Tahmazian; hereby agree and stipulate 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.

6. A wire transfer of $130,187.00, sent on May 8, 2020, from Celtic Bank to a JPMorgan Chase, N.A. account in the name of Redline Auto Collision Inc., was a wire transmission that traveled in interstate commerce from Utah to California.

7. A wire transfer of $157,500.00, sent on May 19, 2020, from Celtic Bank to a Wells Fargo Bank, N.A. account in the name of Voyage Limo LLC, was a wire transmission that traveled in interstate commerce from Utah to Minnesota.

8. A wire transfer of $149,900.00, sent on June 16, 2020, from the United States Small Business Administration ("SBA") to a U.S. Bank account in the name of G&A Diamonds, was a wire transmission that traveled in interstate commerce from Colorado to Missouri to New Jersey to Colorado.

9. A wire transfer of $150,000.00, sent on June 17, 2020, from a JPMorgan Chase, N.A. account in the name of Redline Auto Collision Inc. to a Bank of America, N.A. account in the name of Marietta Terabelian, was a wire transmission that traveled in interstate commerce from California to Pennsylvania or Texas to California.

10. A wire transfer of $149,900.00, sent on June 22, 2020, from the SBA to a Radius Bank (a/k/a LendingClub Bank) account in the name of Timeline Transport, Inc., was a wire transmission that traveled in interstate commerce from Colorado to Missouri to New Jersey to Massachusetts.

11. A wire transfer of $384,100.00, sent on July 31, 2020, from Capital One, N.A. to a Radius Bank account in the

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

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

13. This stipulation is being entered into freely and 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

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DATED: June 14, 2021

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