

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION
HONORABLE STEPHEN V. WILSON
UNITED STATES DISTRICT JUDGE PRESIDING

- - -

United States of America,)
PLAINTIFF,)
VS.) NO. CR 20-579 SVW
Richard Ayvazyan, et al.,)
DEFENDANT,)
_____)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

LOS ANGELES, CALIFORNIA

JURY TRIAL - DAY SEVEN

VOLUME 1 - A.M. SESSION

THURSDAY, JUNE 24, 2021

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I N D E X

WITNESS NAME PAGE

(None.)

EXHIBIT I.D. IN EVID.

(None.)

CLOSING ARGUMENTS PAGE

BY MR. FENTON 34

BY MR. LITTRELL 87

1 LOS ANGELES, CALIFORNIA; THURSDAY, JUNE 24, 2021

2 9:00 A.M.

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6 (The following proceedings were held outside the
7 presence of the jury:)

8 THE COURT: We are here with the parties and
9 counsel. I have given you the final instructions. Just
10 quickly, the government has not redacted the Exhibit 50,
11 as I instructed, in the transcription side, and then
12 there is the translation side.

13 In the transcription, there still is a
14 reference to a lawyer. If you notice at the bottom of
15 the page on the left side, that should not be.

16 MR. PAETTY: Your Honor, the correct transcript
17 is -- they are Exhibits 50B and 50E. The government last
18 night e-mailed a copy of 50B and 50E to Mr. Cruz, and
19 those are the correct redactions.

20 THE COURT: And it doesn't include this lawyer
21 reference.

22 MR. PAETTY: That's correct, your Honor. I can
23 provide the Court with a copy of that.

24 THE COURT: I will take your word for it, but make
25 sure it doesn't.

1 MR. PAETTY: Yes, your Honor.

2 THE COURT: And otherwise, I think we are ready.

3 What time is it now?

4 THE CLERK: It is practically 9:00 o'clock, your
5 Honor.

6 MS. AHN: Your Honor?

7 THE COURT: Yes.

8 MS. AHN: It appears that the Court maintained in
9 the second element on page 35 court instruction No. 28
10 for money laundering, 1956, that the defendant knew the
11 property represented the proceeds of one of those three
12 crimes.

13 That is, again, inconsistent with the statute
14 and the model instruction, your Honor.

15 If the government -- if the Court looks at 18,
16 U.S.C. 1956 A1, A1 specifies whoever knowing that the
17 property involved, a financial transaction represents the
18 proceeds of some form of unlawful activity.

19 THE COURT: What unlawful activity did it
20 represent other than those three crimes?

21 MS. AHN: Well, the statute continues in Section
22 C1. And the statute says:

23 "The term 'knowing that the property involved in a
24 financial transaction' represents the proceeds of
25 some form of unlawful activity means that the

1 person knew the property involved in the
2 transaction represented proceeds from some form,
3 though not necessarily which form, of activity
4 that constitutes a felony under state federal or
5 foreign law."

6 THE COURT: I see. All right.

7 MS. AHN: So we would recommend that the Court use
8 the model instruction.

9 THE COURT: I will edit that quickly.

10 MS. AHN: Yes, your Honor. And one note --

11 THE COURT: Let's get through this. We have spent
12 hours and hours on these things.

13 MS. AHN: Yes, your Honor.

14 THE COURT: We have gone through drafts and
15 drafts. What else?

16 MS. AHN: Yes, your Honor. The Court, regarding
17 government Exhibits 117, 118, 119 and 120, which were the
18 physical exhibits containing the subset Cellebrite
19 report, Counsel John Littrell yesterday made the very
20 reasonable and I think sensible suggestion that the
21 parties agree that since those exhibits were used for
22 foundational purposes for the government exhibits that
23 were submitted through Special Agent Massino that the
24 parties agree that those physical exhibits not go back
25 given all the relevant information from the trial that is

1 already introduced.

2 THE COURT: Okay. I will agree to that.

3 MR. LITTRELL: Yes, your Honor. Just to be clear,
4 I preserve all objections to --

5 THE COURT: Well, yes. Of course.

6 MR. LITTRELL: Also on that jury instruction
7 issue, I just want to preserve another objection that if
8 the jury instruction is changed along the lines of what
9 the government suggests, I think it could permit a
10 constructive amendment of the indictment, because the
11 jury could convict him of crimes that the grand jury was
12 never presented with.

13 THE COURT: I see. All right.

14 MR. JOHNSON: I join that argument. Also, your
15 Honor, I appreciate the edits on the aiding and abetting,
16 but the instruction said you should not apply this
17 instruction to any other counts? It should say you must
18 not apply this instruction to any other counts, because
19 it if they do, that would cause a problem. You can't
20 apply that to the conspiracy counts. You just cannot.

21 THE COURT: In other words, you think "should"
22 should be "must."

23 MR. JOHNSON: Yes, your Honor.

24 THE COURT: Okay.

25 MR. RAM: Your Honor, I join the defense's

1 objections.

2 MR. LITTRELL: Join.

3 MR. RAM: Just point out it has to be connected to
4 PPP and EIDL loans. It is not about the law. Otherwise
5 it's a constructive --

6 THE COURT: What are you referencing?

7 MR. RAM: The money laundering counts.

8 THE COURT: 35, page 35?

9 MR. RAM: It is in a couple of places.
10 Thirty-five, and then on 37 it says the defendant knew
11 that the transaction involved property representing the
12 proceeds of unlawful activity. It should say "related to
13 PPP or the EIDL loans." Otherwise it is not clear that
14 it is about this case.

15 MS. AHN: Your Honor, as we discussed yesterday,
16 that factual matter is contained in a different element.
17 It is contained in -- for page 35, it is contained in the
18 first element, and for page 37, it is contained in the
19 fourth element. Defendant's request would essentially
20 merge those elements together in a way that is
21 inconsistent with the explicit language of the statute.

22 (Court and clerk confer.)

23 THE COURT: Okay. When we get the jury, we will
24 move forward.

25 MR. RAM: One last point, your Honor.

1 THE COURT: Yes.

2 MR. RAM: The one overall language instead of
3 "and." So the conspiracy instruction.

4 THE COURT: You said that yesterday and I have not
5 included it.

6 (Pause in proceedings.)

7 THE COURT: With your charts, Mr. Mesereau. This
8 chart, this one here, I am going to strike that, and not
9 allow that one.

10 MR. MESEREAU: Yes, your Honor.

11 THE COURT: This one, I will allow it with one
12 condition, that you relate it to "firmly convinced," or
13 language in the instruction.

14 In other words, if you use this to show that
15 you can't be firmly convinced, it has some sort of
16 demonstrative or helps your argument. You can do that,
17 but make sure do you this in relation to why you can't be
18 firmly convinced.

19 MR. MESEREAU: Yes, your Honor.

20 THE COURT: You could suspect perhaps, may not be,
21 possibly not, you know, whatever you want it to, but
22 anchor it to the instruction.

23 MR. MESEREAU: Yes, sir. Thank you.

24 (Recess from 9:05 a.m. to 9:18 a.m.)

25 (The following proceedings were held in the

1 presence of the jury:)

2 THE COURT: Members of the jury, now that you have
3 heard all the evidence it is my duty to instruct on the
4 law that applies to this case. A copy of these
5 instructions will be available in the jury room for you
6 to consult.

7 It is your duty to weigh and evaluate all the
8 evidence received in the case and in that process to
9 decide the facts. It is also your duty to apply the law
10 as I give it to you to the facts as you find them,
11 whether you agree with the law or not.

12 You must decide the case solely on the
13 evidence and the law. You should not be influenced by
14 any person's race, color, religious beliefs, national
15 ancestry, sexual orientation, gender identity, gender or
16 economic circumstances.

17 Also, do not allow yourself to be influenced
18 by personal likes or dislikes, sympathy, prejudice, fear,
19 public opinion or biases, including unconscious biases.
20 Unconscious biases are stereotypes attitudes or
21 preferences that people may consciously reject but may be
22 expressed without conscious awareness, control or
23 intention. You will recall that you took an oath
24 promising to do so at the beginning of the case.

25 You must follow all these instructions and not

1 single out some and ignore others; they are all equally
2 important -- they are all important.

3 Please do not read into these instructions or
4 into anything I may have said or done any suggestion as
5 to what verdict you should return. That is a matter
6 entirely up to you.

7 The indictment is not evidence. The
8 defendants have pleaded not guilty to the charges. The
9 defendants are presumed to be innocent unless and until
10 the government proves the defendants guilty beyond a
11 reasonable doubt.

12 In addition, defendants do not have to testify
13 or preempt any evidence. The defendants do not have to
14 prove innocence; the government has the burden of proving
15 every element of the charges beyond a reasonable doubt.

16 Proof beyond a reasonable doubt is proof that
17 leaves you firmly convinced the defendant is guilty.

18 It is not required that the government prove
19 guilt beyond all possible doubt. A reasonable doubt is a
20 doubt based upon reason and common sense and is not based
21 purely on speculation. It may arise from a careful and
22 impartial consideration of all the evidence or from lack
23 of evidence.

24 If after a careful and impartial consideration
25 of all the evidence you are not convinced beyond a

1 reasonable doubt that the defendant is guilty, it is your
2 duty to find the defendant not guilty.

3 On the other hand, if after a careful and
4 impartial consideration of all the evidence you are
5 convinced beyond a reasonable doubt that the defendant is
6 guilty, it is your duty to find the defendant guilty.

7 The evidence you are to consider in deciding
8 what the facts are consists of, one, the sworn testimony
9 of any witness, two, the exhibits received in evidence,
10 and three, any facts to which the parties have agreed.

11 In reaching your verdict, you may consider
12 only testimony and exhibits received in evidence. The
13 following things are not evidence and you may not
14 consider them in deciding what the facts are.

15 Questions, statements, objections and
16 arguments by the lawyers are not evidence. The lawyers
17 are not witnesses. Although you must consider a lawyer's
18 questions to understand the answer of a witness, the
19 lawyer's questions are not evidence.

20 Similarly, what the lawyers have said in their
21 opening statements and what they will say in their
22 closing arguments and at other times is intended to help
23 you interpret the evidence but it is not evidence.

24 If the facts as you remember them differ from
25 the way the lawyers state them, your memory of them

1 controls.

2 Any testimony that I have excluded, stricken
3 or instructed you to disregard is not evidence. In
4 addition, if any evidence was received for a limited
5 purpose, if I gave that instruction you must follow it.

6 Anything you may have seen or heard when the
7 court was not in session is not evidence. You are to
8 decide the case solely on the evidence received at the
9 trial.

10 Evidence may be direct or circumstantial.
11 Direct evidence is direct proof of a fact such as
12 testimony by a witness about what that witness personally
13 saw or heard or did. Circumstantial evidence is indirect
14 evidence. That is proof of one or more facts from which
15 you can find another fact.

16 You are to consider both direct and
17 circumstantial evidence. Either can be used to prove any
18 fact. The law make no distinction between the weight to
19 be given to either direct or circumstantial evidence. It
20 is for you to decide how much weight to give to any
21 evidence.

22 A defendant in a criminal case has a
23 constitutional right not to testify. In arriving at your
24 verdict, the law prohibits from you considering in any
25 manner that the defendant did not testify.

1 A defendant has testified. You should treat
2 this testimony just as you would the testimony of any
3 other witness.

4 In deciding the facts in this case, you may
5 have to decide which testimony to believe and which
6 testimony not to believe. You may believe everything a
7 witness says or part of it or none of it.

8 In considering the testimony of any witness,
9 you may take into account:

10 One, the opportunity and ability of the
11 witness to see or hear or know the things testified to.

12 Two, the witness' memory.

13 Three, the witness' manner while testifying.

14 Four, the witness' interest in the outcome of
15 the case, if any.

16 Five, the witness' bias and prejudice, if any.

17 Six, whether other evidence contradicted the
18 witness' testimony.

19 Seven, the reasonableness of the witness'
20 testimony in light of all the evidence.

21 And eight, any other factors that bear on
22 believability.

23 Sometimes a witness may say something that is
24 not consistent with something else he or she said.

25 Sometimes different witnesses will give different

1 versions of what happened. People often forget things or
2 make mistakes in what they remember. Also, two people
3 may see the same event but remember it differently.

4 You should consider these differences, but not
5 decide that testimony is untrue just because it differs
6 from other testimony.

7 However, if you decide that a witness has
8 deliberately testified untruthfully about something, you
9 may chose not to believe anything that witness has said.
10 On the other hand, if you think the witness testified
11 untruthfully about some things but told the truth about
12 others, you may accept the part you think is true and
13 ignore the rest.

14 The weight of the evidence as to a fact does
15 not necessarily depend on the number of witnesses who
16 testify. What is important is how believable the
17 witnesses were and how much weight you think their
18 testimony deserves.

19 You have heard evidence that a witness had a
20 prior criminal conviction. You may consider this
21 evidence in deciding whether or not to believe this
22 witness and how much weight to give to the testimony of
23 this witness.

24 You are here only to determine whether the
25 defendants are guilty or not guilty of the charges in the

1 indictment. The defendants are not on trial for any
2 conduct or offense not charged in the indictment.

3 A separate crime is charged against one or
4 more defendants in each count. The charges have been
5 joined for trial. You must decide the case of each
6 defendant on each crime charged against that defendant
7 separately. Your verdict on any count as to any
8 defendant should not control your verdict on any other
9 count as to any other defendant.

10 All the instructions apply to each defendant
11 and to each count unless a specific instruction states
12 that it applies only to a specific defendant or count.

13 The parties have agreed to certain facts that
14 have been stated to you. Those facts are now
15 conclusively established.

16 You have heard a recording in the Armenian
17 language. Each of you were shown or will be shown a
18 transcript of the recording which has been admitted into
19 evidence. The transcript an English language translation
20 of the recording.

21 Although some of you may know the Armenian
22 language, it is important that all jurors consider the
23 same evidence. The transcript is the evidence, not the
24 foreign language spoken in the recording.

25 You have heard that defendant Marietta

1 Terabelian made phone calls from jail. You should not
2 consider the fact that she was in jail as evidence of her
3 guilt of the crimes charged in this case.

4 You have heard evidence that defendant Richard
5 Ayvazyan was released under the Bail Reform Act. You may
6 consider this evidence only for its bearing, if any, on
7 the question of whether Richard Ayvazyan was released
8 under that Act during the commission of the offenses
9 charged in counts 28 through 32 of the indictment.

10 You may not consider defendant Richard
11 Ayvazyan's bail status as evidence of guilt of the crimes
12 for which he is now on trial.

13 You have heard that other codefendants were
14 charged in this case and you should not speculate about
15 the reasons why codefendants were not part of the trial.

16 The indictment charges that some of the
17 offenses alleged were committed on or about or in or
18 around certain dates.

19 Although it is necessary for the government to
20 prove beyond a reasonable doubt that the specific offense
21 was committed on the date reasonably near the date
22 alleged in the specified count, it is not necessary for
23 the government to prove the specified offense was
24 committed precisely on the date charged.

25 Certain charts and summaries have been

1 admitted into evidence. Charts and summaries are only as
2 good as the underlying supporting material. You should
3 therefore give them only such weight as you think the
4 underlying material deserves.

5 The defendants are charged in Count 1 of the
6 indictment with conspiring to commit wire fraud in
7 violation of Section 1343 of Title 18 of the United
8 States Code, and bank fraud in violation of Section 1344
9 of Title 18 of the United States Code.

10 In order for the defendant to be found guilty
11 of that charge, the government must prove each of the
12 following elements beyond a reasonable doubt:

13 First, beginning at least on or about
14 March 2020 and continuing to at least August 2020, there
15 was an agreement between two or more persons to commit at
16 least one crime as charged in the indictment.

17 Second, defendant became a member of the
18 conspiracy knowing of at least one of its objects and
19 intending to help accomplish it.

20 A conspiracy is a kind of criminal
21 partnership, an agreement of two or more persons to
22 commit one or more crimes. The crime of conspiracy is
23 the agreement to do something unlawful. It does not
24 matter whether the crime agreed upon was committed.

25 For a conspiracy to have existed, it is not

1 necessary that the conspirators made a formal agreement
2 or that they agreed on every detail of the conspiracy.
3 It is not enough, however, that they simply met,
4 discussed matters of common interest, acted in similar
5 ways or perhaps helped one another.

6 You must find that there was a plan to commit
7 at least one of the crimes charged in the indictment as
8 an object of the conspiracy with all of you agreeing as
9 to the particular crime which the conspirators agreed to
10 commit.

11 One becomes a member of a conspiracy by
12 willfully participating in the unlawful plan with the
13 intent to advance or further some object or purpose of
14 the conspiracy even though that person does not have full
15 knowledge of all the details of the conspiracy.
16 Furthermore, one who willfully joins an existing
17 conspiracy is as responsible for it as the originators.

18 On the other hand, one who has no knowledge of
19 a conspiracy but happens to act in a way which furthers
20 some object or purpose of the conspiracy, does not
21 thereby become a conspirator.

22 Similarly, a person does not become a
23 conspirator merely by associating with one or more
24 persons who are conspirators, nor merely by knowing that
25 a conspiracy exists.

1 A conspiracy may continue for a long period of
2 time and may include the performance of many
3 transactions. It is not necessary that all members of
4 the conspiracy join at the same time, and one may become
5 a member of a conspiracy without full knowledge of all of
6 the details of the unlawful scheme or the names,
7 identities or locations of all of the other members.

8 Even though a defendant did not directly
9 conspire with the other conspirators in the overall
10 scheme, the defendant has in effect agreed to participate
11 in the conspiracy if the government proves each of the
12 following beyond a reasonable doubt.

13 First, that the defendant directly conspired
14 with one or more conspirators to carry out at least one
15 of the objects of the conspiracy.

16 Second, the defendant knew or had reason to
17 know that other conspirators were involved with those
18 with whom the defendant directly conspired.

19 And third, that the defendant had reason to
20 believe that whatever benefits the defendant might get
21 from the conspiracy were probably dependent upon the
22 success of the entire venture.

23 It is not a defense that a person's
24 participation in the conspiracy was minor or for a short
25 period of time.

1 Each member of a conspiracy is responsible for
2 the actions of the other conspirators performed during
3 the course of and in furtherance of the conspiracy. If
4 one member of a conspiracy commits a crime in furtherance
5 of a conspiracy, the other members have also under the
6 law committed the crime.

7 Therefore, you may find the defendant guilty
8 of a crime charged in the indictment if the government
9 has proved each of the following elements beyond a
10 reasonable doubt.

11 First, someone committed the crime.

12 Second, that person was a member of a
13 conspiracy charged in the indictment.

14 Third, that person performed the crime in
15 furtherance of the conspiracy.

16 Fourth, that person and the defendant were
17 members of the same conspiracy at the time that the crime
18 was committed.

19 And fifth, the crime fell within the scope of
20 the conspiracy and could reasonably have been foreseen by
21 the defendant to be a necessary or natural consequence of
22 that conspiracy.

23 The defendants are charged in counts 2 through
24 12 of the indictment with wire fraud in violation of
25 Section 1343 of the United States Code as follows.

1 You will receive a chart. I am not going to
2 read the chart, but there will be in that instruction
3 number 24, at page 26, on the left a column which
4 identifies the count of the indictment, the second column
5 from the left, the date, then, some description of that
6 count, and finally the defendants who were charged in
7 that count.

8 That will be through counts 10 to 12. I hope
9 that will assist you in going through the evidence.

10 In order for defendant to be found guilty of
11 wire fraud in violation of Section 1343 of Title 18 of
12 the United States code, a defendant [sic] must prove each
13 of the following elements beyond a reasonable doubt:

14 First, defendant knowingly participated in or
15 devised a scheme or plan to defraud or a scheme or plan
16 for obtaining money or property by means of false or
17 fraudulent pretenses, representations or promises.

18 Second, the statements made or facts omitted
19 as part of the scheme were material. That is, they had a
20 natural tendency to influence or were capable of
21 influencing a person to part with money or property.

22 Third, the defendant acted with the intent to
23 defraud. That is, the intent to deceive and cheat.

24 And fourth, the defendant used or caused to be
25 used interstate wire communications to carry out or

1 attempt to carry out an essential part of the scheme.

2 In determining whether a scheme to defraud
3 exists, you may consider not only the defendant's words
4 and statements, but also the circumstances in which they
5 are used as a whole.

6 A wiring is caused when one knows that a wire
7 will be used in the ordinary course of business or when
8 one can reasonably foresee such use.

9 It need not have reasonably -- it need not
10 have been reasonably foreseeable to the defendant that
11 the wire communication would be interstate in nature.
12 Rather, it must have been reasonably foreseeable to the
13 defendant that some wire communication would occur in
14 furtherance of the scheme, and an interstate wire
15 communication must have actually occurred in furtherance
16 of the scheme.

17 Instruction No. 25 is with regard to bank
18 fraud. The defendants are charged in counts 13 through
19 20 of the indictment with bank fraud in violation of
20 Section 1344, subsection 2, of Title 18, United States
21 code as follows:

22 As I just told you with wire fraud, there is a
23 chart similarly laid out with regard to the bank fraud
24 charges, and it will assist you if you need to refer to a
25 count and a defendant and a brief description of the

1 count. I won't read that to you. You will get a copy of
2 these instructions, and you will have that to examine if
3 you wish.

4 In order for a defendant to be found guilty of
5 bank fraud in violation of Section 1344, subsection 2, of
6 Title 18 of the United States Code, the government must
7 prove each of the following elements beyond a reasonable
8 doubt for each count:

9 First, defendant knowingly carried out a
10 scheme or plan to obtain money or property from the
11 financial institution specified in the count by making
12 false statements or promises.

13 Second, defendant knew that the statements or
14 promises were false.

15 Third, the statements or promises were
16 material. That is, they had a natural tendency to
17 influence or were capable of influencing a financial
18 institution to part with money or property.

19 Fourth, the defendant acted with the intent to
20 defraud.

21 And fifth, the specified financial institution
22 was federally insured.

23 The following instructions apply only to
24 counts 2 through 12. The instruction I am reading to you
25 will be captioned "Aiding and Abetting," and they only

1 apply for wire fraud and counts 13 through 20 for bank
2 fraud. That is, counts 2 to 12 and 13 to 20. You must
3 not apply this instruction to any other counts.

4 A defendant may also be found guilty of a
5 crime even if the defendant personally did not commit the
6 act or acts constituting the crime but aided and abetted
7 in its commission. To aid and abet means intentionally
8 to help someone else commit a crime.

9 To prove a defendant guilty of committing a
10 particular crime by means of aiding and abetting, the
11 government must prove each of the following beyond a
12 reasonable doubt:

13 First, a crime was committed by someone.

14 Second, the defendant aided, counseled,
15 commanded, induced or procured that person with respect
16 to at least one element of the crime.

17 Third, the defendant acted with the intent to
18 facilitate the crime.

19 And, fourth, defendant acted before the crime
20 was completed.

21 It is not enough that the defendant merely
22 associated with the person committing the crime or
23 unknowingly or unintentionally did things that were
24 helpful to that person or was present at the scene of the
25 crime. The evidence must show beyond a reasonable doubt

1 that the defendant acted with the knowledge and intention
2 of helping that person to commit the crime.

3 A defendant acts with the intent to facilitate
4 the crime when the defendant actively participates in a
5 criminal venture with advance knowledge of the crime.

6 The government is not required to prove
7 precisely which defendant actually committed the crime
8 and which defendant aided and abetted.

9 All of the defendants are charged in counts 26
10 of the indictment with conspiring to engage in money
11 laundering in violation of Section 1956(H) of Title 18 of
12 the United States Code.

13 In order for defendant to be found guilty of
14 that charge, the government must prove each of the
15 following elements beyond a reasonable doubt:

16 First, beginning no later than in or around
17 March 2020 and continuing until at least in or around
18 October 2020, there was an agreement between two or more
19 persons to commit at least one of the following crimes:

20 One, money laundering in violation of Section
21 1956(A)(i)(b)(i) of Title 18 of the United States Code,
22 as explained in instruction 28. And, two, engaging in
23 monetary transactions in property derived from specified
24 unlawful activity in violation of Section 1957 of Title
25 18 of the United States Code, as explained in instruction

1 No. 29, with all of you agreeing as to the particular
2 crime which the conspirators agreed to commit.

3 And second, defendant became a member of the
4 conspiracy knowing of at least one of its objects and
5 intending to help accomplish it.

6 In considering the charge of conspiracy to
7 commit money laundering, you must consider the general
8 conspiracy instructions that the Court provided to you
9 earlier. Those instructions are numbers 21 through 22.

10 The crime of money laundering under Section
11 1956(A)(i)(b)(i) of Title 18 of the United States Code
12 consists of the following elements which the government
13 must prove beyond a reasonable doubt:

14 First, defendant conducted a financial
15 transaction involving property that represented the
16 proceeds of conspiracy to commit bank fraud and wire
17 fraud in violation of Section 1349 of Title 18 of the
18 United States Code, wire fraud in violation of Section
19 1343 of Title 18, or bank fraud in violation of Section
20 1344 of Title 18.

21 The defendant knew that the property
22 represented the proceeds of some form of unlawful
23 activity.

24 Third, defendant knew that the transaction was
25 designed in whole or in part to conceal or disguise the

1 nature, location, source, ownership, or control of such
2 proceeds.

3 A financial transaction is a transaction
4 involving the use of a financial institution that is
5 engaged in or the activities of which affect interstate
6 or foreign commerce in any way.

7 The phrase "knew that the property represented
8 the proceeds of some form of unlawful activity" means
9 defendant knew the property involved in the transaction
10 represented the proceeds from some form, though not
11 necessarily which form of activity that constitutes a
12 felony. I instruct you that conspiracy to commit wire
13 fraud, bank fraud and wire fraud are such felonies.

14 Let me say at that again. I instruct you that
15 conspiracy to commit wire fraud and bank fraud -- comma,
16 wire fraud and bank fraud are each a felony.

17 The crime of engaging in monetary transactions
18 and property derived from specified unlawful activity
19 under Section 1957 of Title 18, consists of the following
20 elements which the government must prove beyond a
21 reasonable doubt:

22 First, the defendant engaged in a monetary
23 transaction.

24 Second, defendant knew that the transaction
25 involved criminally derived property.

1 Third, the property had a value greater than
2 \$10,000.

3 Fourth, the property was in fact derived from
4 conspiracy to commit bank fraud and wire fraud in
5 violation of 1349 of Title 18, wire fraud in violation of
6 Section 1343 or bank fraud in violation of Section 1344.

7 Fifth, the transaction occurred in the United
8 States.

9 The term "monetary transaction" means a
10 deposit, withdrawal, transfer or exchange in or affecting
11 interstate commerce of funds or a monetary instrument by,
12 through or to a financial institution.

13 Defendant Vahe Dadyan is charged in count 27
14 and defendant Richard Ayvazyan is charged in counts 28
15 through 32 with money laundering in violation of 1956.
16 And the instruction has all the subsections. I am not
17 going to read that.

18 Instruction No. 28 explains the elements of
19 money laundering in violation Section 1956 in count 30.
20 That is, in count 30, you should look at the instruction
21 in instruction 28 for the elements of money laundering.

22 For each of counts 27 through 32, you must
23 find beyond a reasonable doubt that the defendant charged
24 in those counts committed each of the three elements
25 described in instruction No. 28.

1 In considering the charges in counts 27
2 through 32, you must be careful to refer to the elements
3 in instruction No. 28 and not instruction No. 29.

4 I know this is a lot for you to remember with
5 precision. I am giving you these instructions so that
6 you have a general idea of how to follow the arguments
7 that the lawyers will give to you in a few moments, but
8 ultimately you will get a copy of these instructions to
9 review if necessary in the jury room, so don't be fearful
10 that you are not remembering everything I say. I
11 wouldn't remember everything I say if I were sitting
12 where you are. But that is the general idea of reading
13 these instructions at this point.

14 Defendant Richard Ayvazyan is charged with
15 committing the offenses charged in counts 28 through 32
16 while released pursuant to the Bail Reform Act. If you
17 find beyond a reasonable doubt that defendant Richard
18 Ayvazyan committed any of these offenses, you may also
19 determine whether the government has proven beyond a
20 reasonable doubt that he committed the offense while on
21 release.

22 Defendant Richard Ayvazyan is charged in
23 counts 21 and 22 of the indictment with aggravated
24 identity theft in violation of Section 1028(A) of Title
25 18 of the United States Code.

1 Defendant Marietta Terabelian is charged with
2 this offense in count 22.

3 And defendant Artur Ayvazian is charged with
4 this offense in count 24.

5 In order for defendant to be found guilty of
6 aggravated identity theft as alleged in these counts, the
7 government must prove each of the following elements
8 beyond a reasonable doubt:

9 First, the defendant knowingly transferred,
10 possessed or used without legal authority a means of
11 identification of another person; namely, the following:

12 For count 21, the name of Mark Zindroski.

13 For count 22, the name and California driver's
14 license number of Nazar Terabelian.

15 For count 4, the name and date of birth of
16 Anna Dzukaeva.

17 Second, the defendant knew the means of
18 identification belonged to a real person.

19 And third, the defendant did so during and in
20 relation to a specific bank fraud or wire fraud offense
21 charged in the indictment; namely, the following:

22 For count 21, bank fraud as charged in
23 count 14.

24 For count 22, wire fraud, as charged in count
25 11.

1 And for count 22, wire fraud as charged in
2 count 12.

3 The government need not establish the means of
4 identification of another person. Let me say that again.
5 The government need not establish that the means of
6 identification of another person was stolen or used
7 without that person's consent or permission.

8 A person has possession of something if the
9 person knows of its presence and has physical control of
10 it or knows of its presence and has the power and
11 intention to control it.

12 More than one person can be in possession of
13 something if each knows of its presence and has the power
14 and intention to control it.

15 I have three or four parting instructions to
16 give to you as to how you organize yourselves,
17 communicate with me, if necessary, how you deal with the
18 verdict form and so forth, but I will await giving you
19 those few instructions until after the lawyers have
20 completed their final arguments and before you begin your
21 deliberations.

22 We will now first hear from the government,
23 and then the defendants will have opportunities to
24 deliver their final arguments and the government will
25 have a rebuttal.

1 I am advised that I may have accidentally said
2 something that I didn't intend to say. If I did say the
3 defendant must prove something beyond a reasonable doubt,
4 of course the government has the burden of proving things
5 beyond a reasonable doubt.

6 If I did misstate something, ignore that.

7 All right. Let's begin. And it will be
8 Mr. Fenton speaking for the government.

9 MR. FENTON: Thank you, your Honor. Members of
10 the jury, this is a case about the defendants' decision
11 to perpetrate a massive fraud during a national
12 catastrophe.

13 In a race against time, the government tried
14 to get out disaster relief funds to small businesses who
15 needed the money to survive. Seeing opportunity in
16 crisis, the defendants tried to get those disaster relief
17 funds first before that money ran out, meaning before
18 that money went to the small businesses who needed that
19 money to survive.

20 The evidence that we have heard over the last
21 five days shows that the defendants worked together to
22 build an assembly line of fraud. The defendants worked
23 together to produce, to submit disaster relief loan
24 applications, and once those disaster relief loan
25 applications were granted and they were funded and they

1 got money, the defendants worked together to conceal and
2 to spend those funds.

3 Over the last five days, we have seen and we
4 have heard evidence about fake, stolen and synthetic
5 identities, fraudulent disaster relief loan applications,
6 fake tax forms, fake payroll reports, bank accounts that
7 were opened using other people's names, the names of
8 identities that are fake and stolen of individuals and
9 also of businesses as well.

10 And you have heard about wire transfers,
11 checks, credit cards, debit cards, all used to move the
12 money and to spend the criminal proceeds.

13 Now, while this fraud was massive, the
14 defendants who were responsible for this are part of a
15 small group of family and friends. You have the
16 defendant Richard Ayvazyan, his wife, Marietta
17 Terabelian, his brother Artur Ayvazian, his
18 sister-in-law, Tamara Dadyan, Tamara's cousin, defendant
19 Vahe Dadyan, defendant Richard Ayvazyan's associates and
20 friends Manuk Grigoryan and Edward Paronyan, and an
21 individual who worked with them named Armin Hayrapetyan.
22 That is the small group of defendants who were directly
23 involved in this who conspired and worked together.

24 A central feature of this particular
25 conspiracy is that defendants obscured their own

1 identities and they obscured their role. The defendants
2 hid behind each other and they hid behind the fake
3 identities that they had created.

4 In the trial they have done the same thing.
5 You heard in opening statements that Vahe Dadyan blames
6 his cousin Tamara Dadyan. You heard that Artur Ayvazian
7 blames his wife. You heard that Marietta Terabelian
8 blames her husband, Richard Ayvazyan. And Richard
9 Ayvazyan blames Manuk Grigoryan, his coconspirator.

10 The evidence that you have seen and heard over
11 the last five days, however, shows beyond a reasonable
12 doubt that the defendants are all members of the
13 conspiracies that are charged, the two conspiracies:
14 One, to commit bank and wire fraud, and two, to commit
15 money laundering.

16 Once you are a member of a conspiracy, you
17 cannot discharge your responsibilities by blaming your
18 co-conspirators. Once you have that agreement to join,
19 you are all in it together.

20 Now, Judge Wilson has instructed you on the
21 law which you must follow. In a moment we will review
22 the evidence proving beyond a reasonable doubt that the
23 defendants are guilty of the crimes charged.

24 Before we do that, we respectfully ask you to
25 consider three things as you review the evidence.

1 First, follow the money. Try as they may to
2 hide behind each other and to hide behind the fake,
3 stolen and synthetic identities in this case, the money
4 points directly to the defendants.

5 In some instances, the defendants directly
6 received the fraudulently obtained disaster relief money.
7 Defendants Artur Ayvazian, Vahe Dadyan, they put their
8 names on the applications, then they took those funds and
9 they lied on those applications.

10 In other instances, the defendants indirectly
11 received the money after it was funneled through accounts
12 to their co-conspirators or fake and stolen business
13 names. This applies to defendant Richard Ayvazyan. It
14 applies to defendant Marietta Terabelian.

15 If you follow the money, you will find the
16 mansion, the 3.25 million-dollar mansion that Richard
17 Ayvazyan and Marietta Terabelian purchased with PPP and
18 EIDL money, in their own name.

19 If you follow the money, you will find the
20 luxury watches that defendant Richard Ayvazyan purchased
21 from the Timepiece Gentleman, Anthony Farrer, who took
22 that stand and testified, and he purchased it using PPP
23 and EIDL loan money. Those watches were found in Richard
24 Ayvazyan and Marietta Terabelian's home, and they were
25 brought here and you saw them with your own eyes.

1 If you follow the money, you will find the 60
2 gold coins that Richard Ayvazyan and Marietta Terabelian
3 purchased using money obtained from a PPP loan that was
4 filled out in the name of Marietta Terabelian's then
5 recently deceased father, Nazar Terabelian. Those 60
6 gold coins, again, were found in Richard Ayvazyan and
7 Marietta Terabelian's home. And you saw them with your
8 own eyes.

9 If you follow the money, you will find the
10 Harley-Davidson motorcycle that Artur Ayvazian admitted
11 on the stand that he purchased and that was purchased
12 with PPP funds that he also told you he needed so
13 desperately to save his business.

14 And if you follow the money, you will find
15 Vahe Dadyan's \$50,000 cut of the criminal proceeds given
16 to him by Richard Ayvazyan using a fake company, Timeline
17 Transport.

18 The second thing that we would ask you to
19 consider as you go through the evidence is that
20 co-conspirators have different roles. The defendants are
21 charged with being participants, members of two
22 conspiracies: A conspiracy to commit bank fraud and wire
23 fraud, number one, by fraudulently obtaining PPP and EIDL
24 loan funds, and, number two, a conspiracy to commit money
25 laundering.

1 As we explained during our opening statements,
2 the defendants each played very different roles. We
3 previewed this for you, and this bears out in the
4 evidence.

5 Defendant Richard Ayvazyan was the leader. He
6 put together the assembly line for fraud and for
7 laundering the criminal proceeds. He also used a
8 synthetic identity Iulia Zhadko.

9 Defendant Marietta Terabelian assumed the
10 identity of Victoria Kauichko to apply for many loans and
11 moved and spent the criminal proceeds.

12 Defendant Artur Ayvazian submitted fraudulent
13 PPP and EIDL loan applications. He created fake
14 identities and he moved the criminal proceeds as well.

15 Defendant Vahe Dadyan, he no doubt has the
16 smallest role in the entire conspiracy. We previewed
17 that from minute one of our case. His role involves one
18 single loan. But the fact remains, he cooperated with
19 his cousin Tamara Dadyan and Artur Ayvazian and Richard
20 Ayvazyan to fraudulently apply for that loan through the
21 assembly line of fraud that they had created, and he got
22 his cut. He gave the money to a fake company. He
23 received the money back from a fake company. That makes
24 him a member of the conspiracy.

25 Regardless of their role, they are all

1 co-conspirators.

2 Third, we ask you to remember that the
3 defendants are liable if they submitted or caused to be
4 submitted these applications. The indictment charges
5 that each defendant committed an act or that they caused
6 that act to be committed, meaning, for example, the
7 indictment charges that defendant Richard Ayvazyan
8 submitted a PPP loan application or caused that PPP loan
9 application to be submitted.

10 It is therefore not necessary that each
11 defendant actually submit the application themselves if
12 they otherwise took steps to cause the fraudulent PPP
13 application to be submitted.

14 Now, we will move on to the evidence. We will
15 move on to a review of the evidence.

16 From the outset, you heard that the federal
17 government threw a lifeline to small businesses, and that
18 was in two forms. The first was with the Paycheck
19 Protection Program, and Kathleen Littwin from the SBA
20 came and testified here.

21 She testified about the fact that they allowed
22 the borrowers to provide self-certifications, and she
23 also testified about the type of information that was
24 important to the SBA.

25 And she walked through the various

1 certifications, including certifications regarding the
2 number of employees and explaining why that was
3 important, and the fact that the business was in fact in
4 operation, and the fact that those proceeds that would be
5 lent out by the SBA would actually be used for business
6 expenses and not personal expenses.

7 Likewise, she also testified about the
8 economic injury disaster loan program, which was
9 similarly designed to allow for self-certification and
10 also to allow businesses to get the lifeline that they
11 needed to continue operations, save jobs and save the
12 economy.

13 Now, just like with respect to the PPP loans,
14 the use of these loans was to be for business purposes,
15 not personal purposes. And, again, she testified that it
16 was important to the SBA that that was how the funds were
17 used.

18 You also heard from a Celtic Bank
19 representative, Justin Masterman, who told you that with
20 respect to the PPP program it mattered to the bank
21 whether or not borrowers were truthful on their
22 application. This was important so that the government
23 was able to get the money in the right hands.

24 Now, we have showed you some of the text
25 messages that are contained in Exhibit 10. Exhibit 10 is

1 the excerpts from the extensive text communications
2 between two individuals.

3 The first individual is named Rich New, and
4 ties back to a telephone number that ends 4170. We
5 showed you evidence that that phone number ties back to
6 Iulia Zhadko. And the telephone number was also used by
7 Richard Ayvazyan.

8 The second participant is Tamara Dadyan, who
9 is referred to in the texts as Tammy.

10 These two individuals, who were the leaders of
11 this fraudulent conspiracy, provide in those texts
12 details, details about how they planned and executed the
13 conspiracy. I would strongly encourage you, read those
14 texts.

15 They will show you that on March 12, as soon
16 as they heard about the announcement from the president
17 that they were going to pass this bill to give billions
18 of dollars in funding, Richard Ayvazyan and Tamara Dadyan
19 were on top of it. Tamara writes, "We can totally do
20 this."

21 Weeks later, Richard Ayvazyan writes they
22 started getting e-mails today from the SBA, \$10,000
23 guaranteed. And this is the advance that you heard
24 about. Tamara says, okay, so let's do it for all these
25 idiots. 10,000 is 10,000.

1 Richard Ayvazyan writes, "You use the bank
2 statement I gave you for Iulio. They don't check for
3 shit, Tam. It's all automated."

4 Weeks later -- or months later, he writes,
5 "Newtek is the bomb. Just got docs on two I did last
6 week," with a huge smiley face.

7 And there are other text messages as well if
8 you take time to look at them, text messages that show
9 you there was a race against time. "We need to do this
10 to the max we can now because you understand that the
11 market is going to crash." And, "We can use the same
12 names."

13 And they did. We showed you in the summary
14 chart exhibit, 116, that they were using the same names
15 over and over again. Richard says in a separate text,
16 "Good because you know this program is over by the end of
17 the month. So get as much as you can."

18 They talk about the frustrations and
19 challenges that they encounter when things don't go their
20 way. And if you see here, they are laughing all the way
21 to the bank.

22 There is difficulty trying to get in touch
23 with one of the banks and Tamara Dadyan says, "I was like
24 on hold forever, bro. Kept calling back. Today was a
25 disaster, just like the loan they are giving, LOL."

1 They also talked about which places were the
2 best places to get the loans because they were easiest.
3 And in this text, for example, you see Richard saying, "I
4 did two yesterday and got docs today. One of them
5 already funded the account. It is crazy. Do PayPal."
6 And PayPal is WebBank.

7 And then you see them reporting to each other
8 when they successfully get the loans. Here they say,
9 "Signed today" with a bag of cash, and a sign saying that
10 everything is good. Tamara Dadyan responds "LOL,"
11 laughing out loud.

12 And they continue to laugh, "laughing my ass
13 off. They just ran out of money and they can't fund.
14 Just got an e-mail." Tamara Dadyan writes, "They are
15 never going to have enough money. America needs to file
16 BK."

17 These are the individuals who led this
18 conspiracy. These are the individuals who created an
19 assembly line for fraud. They learned how to do this
20 from day one when the program became available. They put
21 together the parts and then they shared them with their
22 co-conspirators.

23 There are five exhibits. There is a lot of
24 evidence in this case. There is a mountain of evidence
25 in this case, but there are five exhibits that I would

1 direct your attention to.

2 First, the text messages between Richard
3 Ayvazyan and Tamara Dadyan, government Exhibit No. 10.
4 It is about 41 pages, and it is worth the read. It goes
5 through in details the inner workings of the fraud. It
6 also details the involvement of co-conspirators,
7 co-conspirators like Artur Ayvazian and Vahe Dadyan. We
8 will give you some examples of those text messages later.

9 The second exhibit that we suggest that you
10 read is the "Flow of Funds Summary Chart" exhibit.
11 Marylee Robinson testified about her efforts to follow
12 the money. This is the document that she put together
13 that does just that.

14 Again, this is a document that shows you that
15 this is a cohesive conspiracy involving eight defendants,
16 eight individuals, and it shows you -- if you look, you
17 can see all the different places where these defendants
18 are interacting and sharing money from PPP and EIDL loan
19 programs.

20 The third piece of evidence that we would
21 direct you to is government Exhibit 57A, the driver's
22 licenses that came from Artur Ayvazian's house. Dozens,
23 dozens of fake driver's licenses with individuals on
24 there, Social Security cards, credit cards and debit
25 cards all found in his home.

1 There are also credit cards that were
2 belonging to Iulia Zhadko and Victoria Kauichko seized
3 from defendants Richard Ayvazyan and Marietta Terabelian
4 at Miami International Airport as they came back from a
5 vacation from Turks and Caicos in the middle of the
6 pandemic in October.

7 And, fifth, we direct you to the jail calls
8 that Marietta Terabelian placed when she was arrested at
9 Miami International Airport and was in jail in Miami.
10 Those are government Exhibits 50A/B and 50D/E.

11 Now, we will talk about the individual counts
12 and the evidence supporting those counts. And here, this
13 is not all of the evidence. This is just the evidence
14 that we are choosing to highlight for you here.

15 These are the eight co-conspirators. First,
16 we will focus on Richard. Here is one of the many texts
17 that show Richard Ayvazyan and Tamara Dadyan planning the
18 conspiracy. And if you recall in the opening statement,
19 Richard Ayvazyan is suggesting that it is Tamara Dadyan
20 who would be responsible, not him.

21 And if you look here, he says, "Go to BlueVine
22 right now and apply. They are approving and closing
23 within 24 hours." And she says, "With same info?" He
24 says, "Yeah, just change your EIN by one number. I did
25 seven apps last night, and four of them got e-mailed that

1 it is funded." He goes on to say at the bottom, "I
2 didn't sleep all night. I was working 24 hours
3 straight."

4 He then asked her a question in a separate
5 text message, "Who told you to use those numbers? She
6 says, "Me myself, LOL." He responds, "You are funny. I
7 told you that I have the freaking formula."

8 How do we know that Richard Ayvazyan is Iulia
9 Zhadko? Well, there is a mountain of evidence that shows
10 that he is. Here are the various Iulia Zhadko IDs that
11 are in evidence with references to where you can find
12 them.

13 There are three different versions where he is
14 a male, and if you look at the address, the address on
15 the fake driver's license matches the address on the
16 driver's license for defendant Richard Ayvazyan, 5141
17 Genesta Avenue, Encino, California. That ID is the ID
18 that Richard Ayvazyan sent to the Timepiece Gentleman in
19 a text message from the telephone number ending 4170.
20 That is the same telephone number that he uses to text
21 with Tamara Dadyan.

22 This is also the same address, if you look at
23 text messages -- I'm sorry, e-mails from Richard
24 Ayvazyan. When he is buying his dream home, the one that
25 he brought with PPP and EIDL loan funds, he uses the

1 address 5141 Genesta. He says, "You can use that address
2 below for all mailing pertaining to the purchase."

3 As we demonstrated to you through the witness
4 testimony and the evidence that we have submitted, Iulia
5 Zhadko is actually a woman. And Iulia Zhadko is a
6 foreign exchange student who had come to the United
7 States for a brief period of time and moved on, as was
8 the case with other individuals.

9 The reason why that is relevant, and this will
10 come with respect to later counts, is because with
11 aggravated identity theft, one of the elements is that
12 you have to show that there was knowledge that the
13 defendant knew that the person's whose identity was at
14 issue was a real person.

15 What you see in this case is a pattern where
16 foreign students who are coming to the United States on
17 visas are having their identities taken by the defendants
18 and used for purposes like this.

19 We then look at the credit cards that were
20 discovered in Richard Ayvazyan's luggage at Miami
21 International Airport. There are five credit cards here
22 in the name of Iulia Zhadko. And not only in the name of
23 Iulia Zhadko, but if you look at these credit cards you
24 will see they are in the name of companies that apply for
25 PPP and EIDL loans, Top Quality contracting, Turing Info

1 Solutions. Those are two companies that we see loans
2 applied for that are fraudulent loan applications and the
3 money goes back to defendant Richard Ayvazyan.

4 The sixth card that we see here is Runyan Tax
5 Services. This is a Victoria Kauichko card. And again,
6 this is another company that applied for a PPP loan. And
7 you heard testimony during the trial from Jack Runyan,
8 who founded Runyan Tax Services. He does not know
9 Victoria Kauichko.

10 He has one employee since his wife passed
11 away. That employee is he himself. That is it. It is
12 his company, not their company. But they are carrying
13 around his card and applying for loans in his name.

14 Here is also a credit card discovered on
15 Richard Ayvazyan's phone. That credit card is in the
16 name of Iulia Zhadko. We then see that Iulia Zhadko
17 applied for many different loans. This one in particular
18 is the Timeline Transport loan. And if you follow the
19 money, it goes right to Richard Ayvazyan. It is used as
20 part of the down payment on what counsel said was in her
21 opening statement Richard Ayvazyan and Marietta
22 Terabelian's dream home, purchased in June, 2020, in the
23 middle of a pandemic, with disaster relief funds.

24 There is other financial information that is
25 found in Richard Ayvazyan's phone as well. Runyan Tax

1 Service checks. Checks from Fiber One Media with
2 somebody else's name, Suzanna Merkuchian. Anna
3 Manukyan's name. A credit card in the name of Victoria
4 Kauichko. Another credit card with the name Victoria
5 Kauichko. And a credit card that says Richard Ayvazyan,
6 Fiber One Media.

7 And then again, these are companies that are
8 applying for these loans. We showed you in summary
9 Exhibit 116 that there is evidence showing that Fiber One
10 Media applied for PPP and EIDL loan funds. And again,
11 this is a fraudulent company, a fake company.

12 Now, how do we know that this is a conspiracy?
13 There is a lot of different evidence to show that they
14 joined together. Some of the evidence is the text
15 messages. Some of the evidence is the flow of funds.

16 Another piece of evidence that is really
17 important are these charts. What they show is the
18 assembly line of fraud. The assembly line for fraud.

19 There are component parts that go into these
20 applications. Two things are particularly important.
21 One, payroll reports from Gusto, or payroll reports
22 period. In this particular instance, they came from
23 Gusto.

24 And you heard from a represent from Gusto who
25 testified about why some of the payroll reports that you

1 saw in this case did not come from Gusto and that they
2 were fake.

3 The second piece of evidence is Form 940s and
4 form 941s. These are tax forms which were fraudulently
5 completed and submitted in support of these applications.
6 The reason why they evidence a conspiracy amongst
7 defendants is because if you look at the different
8 applications and you look at the supporting
9 documentation, there are different groupings where they
10 use the same numbers to the penny. To the penny.

11 And they do it over and over again. And here
12 are some examples of companies that are directly tied to
13 Richard Ayvazyan. Fiber One Media and Mod Interiors.

14 And then we see companies that are tied to
15 other co-defendants -- other co-conspirators. For
16 example, Edward Paronyan, who submitted the application
17 in the name of Redline Auto Collision. His payroll
18 report that supposedly came from Gusto was the same as
19 payroll reports for Fiber One Media and Mod Interiors to
20 the penny, not only for the year, but for all 12 months
21 as well.

22 This is evidence of conspiracy.

23 We now look at Marietta Terabelian. There is
24 a credit card discovered in Marietta Terabelian's luggage
25 at Miami International Airport. This credit card did not

1 belong to her. It was in the name of Victoria Kauichko.

2 On a phone that was seized elsewhere, not at
3 the airport, but somewhere else, at her home on
4 November 5th, there is an image that is discovered on
5 Marietta Terabelian's phone of Fiber One Media and the
6 name Suzanna Merkuchian, which should be familiar because
7 it is the same name on the card in Richard's possession.
8 And there is personally identifiable information
9 contained on this note.

10 If you look at the text messages that Richard
11 Ayvazyan sent to the Timepiece Gentleman, Anthony Farrer,
12 those text messages show that when he was having watches
13 shipped, one of those watches he had shipped to someone
14 that he said was his wife, and he provided his wife's
15 info. The information that he provided, the name
16 Victoria Kauichko, the company Fiber One Media.

17 The evidence also shows that if you look at
18 the card that was in Marietta's possession, that card was
19 used to buy things that would be unique to Marietta
20 Terabelian. For example, furniture purchased from Italy
21 2000, which is imported fine furniture, sold to Victoria
22 Kauichko, delivered to 5141 Genesta Avenue. That is
23 where they lived before they moved to their dream home.

24 This card was also used to pay for the rent
25 for the apartment at 6150 Canoga Avenue, which you heard

1 a lot about during this trial. The reason why you have
2 heard a lot about that apartment is because it was an
3 apartment that was used in furtherance of the scheme to
4 commit bank fraud and wire fraud.

5 There are several different applications that
6 were submitted using this address, the name of Victoria
7 Kauichko, Fiber One media, Journeyman Construction, which
8 is another Victoria Kauichko company, and Runyan Tax
9 Service as well.

10 IP addresses that tie back to this apartment
11 were also used in furtherance of the fraud. If you look
12 at how this money was spent -- and I will give you an
13 example -- if you look at how the Runyan Tax Service
14 money was spent, it was spent on things unique to
15 Marietta Terabelian.

16 She paid for her father's funeral using money
17 from Runyan Tax Service. That check was cut on
18 July 21st. If you look at the bank records, it will show
19 on the same day that a PPP loan came in from Seattle Bank
20 for Runyan Tax Services.

21 Runyan Tax Services also paid for more
22 furniture delivered to 5141 Genesta Avenue, which is
23 where defendants Richard Ayvazyan and Marietta Terabelian
24 resided before they moved to their dream home.

25 And the money from Runyan Tax Services was

1 also used to pay for a down payment for another home.
2 That home was purchased in the name of Iulia Zhadko, and
3 the person who paid for the water and the power for that
4 home, the power user for the home, Verdui Terabelian,
5 Marietta Terabelian's mother.

6 Marietta Terabelian also played a role with
7 respect to pooling and transferring money. And you
8 recall this chart. This was from Exhibit 115. And if
9 you look here, you see her role. She is receiving EIDL
10 and PPP loan money into her personal bank account.

11 And if you look at the bank records, and they
12 are in evidence, what you will see is she is the
13 individual owner of that account, the sole signatory.
14 She controls that bank account, what goes in, what goes
15 out.

16 What came in was EIDL and PPP loan money
17 fraudulently obtained. What went out was a wire transfer
18 to Encore Escrow to purchase a 3.25 million-dollar home
19 in her name and the name of her husband on Topeka Drive.

20 And then there are the jail calls. And we
21 encourage you to take a look at these jail calls in
22 detail.

23 There is two that we focus on here. The
24 first, "Richard and I were caught," which means according
25 to the translator, apprehended. "Found a card or I don't

1 know what. You know the charges," which means that she
2 knows the charges. And then she implores the person on
3 the other end, "Clean the house as much as you can."

4 Now, counsel suggests that what that means is
5 that she got caught, she is worried about the charges and
6 the first thing she thinks is to tidy up. That defies
7 common sense. She says "you know the charges," because
8 she knows the charges and she says you know the charges
9 because she wants them to clean the house of evidence,
10 evidence of the crime.

11 These are the parts of the assembly line of
12 fraud that we spoke about earlier. There are the fake
13 ID's, there are the applications, there are the payroll
14 reports. They are all the things that you see on
15 Richard's phone and elsewhere and at Artur's home at
16 Weddington and on his phone as well.

17 There is a second call, "Tell mom me and
18 Richard are both at Miami jail. Nothing wrong. Tell
19 them so that they know so that they can try to clean,
20 clean the house as much as you can, everything, and
21 whoever calls, whatever they say, you shouldn't say
22 anything to anyone."

23 Now, we will take a look at Artur Ayvazian's
24 role in the crime. Artur Ayvazian lived at 17450
25 Weddington Street. You know that because he told you.

1 You know that because that is what the agent said as
2 well. There are volumes of evidence showing that that
3 was his home.

4 This is what was found in his home. Dozens of
5 fake ID's, fake driver's license, all parts of the
6 assembly line for fraud. And they found PPP loan
7 applications as well.

8 These are not digital copies. These are hard
9 copies. And if you look -- I will give you some
10 examples. If you look at the types of applications that
11 were found in Artur Ayvazian's home, one was for Anna
12 Dzukaeva. She is the individual who is alleged -- whose
13 identity was allegedly used in connection with applying
14 for fraudulent PPP loan applications. You also find a
15 hard copy of PPP loan applications submitted in Tamara
16 Dadyan's name as well as Artur Ayvazian's name.

17 These hard copy documents are contained in his
18 home along with the fake IDs.

19 There are also lists of e-mails for borrowers,
20 and these e-mails are not for Tamara or Arthur. These
21 are e-mails for people like Anna Dzukaeva, people whose
22 e-mails were used fraudulently to apply for PPP and EIDL
23 loans.

24 And you find checks, checks for dozens of
25 companies. Here is just an excerpt. Here are just

1 examples. These companies, Victoria Kauichko, Sabala
2 Construction, Anna Dzukaeva, Liudmyla Kopytova, Voyage
3 Limo, Vahe Dadyan's company. EM Construction, Rosa
4 Avakian. All of these individuals, none of whom are
5 Tamara Dadyan or Artur Ayvazian. These are other
6 people's names, other people's companies.

7 You also find handwritten notes relating back
8 to Fiber One Media, which is similar -- it is the same
9 company for which there are handwritten notes found on
10 Marietta Terabelian's phone as well. Again, this is more
11 evidence of conspiracy. The reason why, these companies
12 are fake. They don't exist.

13 These are two important exhibits. The first
14 is a list that was found in Artur Ayvazian's home. It
15 lists local construction companies, Sabala Construction.
16 VLA Construction, EM Construction. These are companies
17 whose names were used to fraudulently apply for PPP and
18 EIDL loans.

19 If you look at the Canoga apartment, which was
20 initially leased by Manuk Grigoryan, one of the
21 co-conspirators, and later leased by Victoria Kauichko,
22 it ties back to that card that was found on Marietta
23 Terabelian's person at Miami International Airport. The
24 lists have similarities.

25 Sabala is on both lists, VLA is on both lists.

1 EM Construction is on both lists. It is not a
2 coincidence. It is a conspiracy. They are working
3 together to file these loan applications.

4 This is further proof of a conspiracy between
5 Tamara Dadyan, Artur Ayvazian, Manuk Grigoryan, Richard
6 Ayvazyan, Marietta Terabelian, the individuals who
7 controlled these different residences.

8 This shows what was found in those residences,
9 and there is overlap. And if you look at the checks as
10 well that I just showed you, there are check books in the
11 name of Sabala Construction, EM Construction, and other
12 construction companies as well, which is further proof of
13 the conspiracy.

14 If we look at what Arthur did with his money,
15 in addition to buying a Harley-Davidson, he gave the
16 money to his brother to buy a 3.25 million-dollar mansion
17 just to help him out.

18 And here are text messages between Richard
19 Ayvazyan and Tamara Dadyan that put Arthur in the middle,
20 the middle of this conspiracy, "You have money in B of A.
21 Art does. I will call him in a minute. I need 95,000
22 for escrow today." He is going to call Art.

23 "Leave a note to file on his trucking."
24 That's Richard's suggestion, and that is what he does.
25 And he takes the money and gives it to Richard, and he

1 buys himself a Harley.

2 "Tom is coming over," Tamara says. "I told
3 Art show him the decline letter from EIDL, and it is
4 simple. It is 35 percent for PPP." 35 percent what?
5 The evidence shows it's a 35 percent cut. They help him
6 file, and they get a piece of it.

7 And Richard says, "Okay, let me do this. Give
8 me 30 minutes." And Artur Ayvazian is not an errand boy.
9 You look at the text in the middle, Art wants to do
10 another one with US Bank.

11 And when you look at another text message
12 here, "Rich, for Runyan, you have enough money. If I'm
13 right, 73,500 hours and my Vahe deal, the 38,750 and the
14 58,125."

15 These are cuts from the conspiracy. They are
16 dividing the criminal proceeds. This is the evidence.
17 Text messages between co-conspirators talking about other
18 co-conspirators and their roles.

19 They need checks to order for different fake
20 identities. This one is Mikala(Phon.). " Which place
21 will be fast," Tamara asks. Richard has an idea, "Have
22 Art go buy those blank ones from Office Depo and just buy
23 the software for every bank. Just make the checks."

24 And then Tamara says, "I am expecting a wire
25 for Art for \$73,500." This is the wire that we spoke

1 about earlier. "And for me," she is reminding him,
2 "157,000."

3 Here is the check that Arthur gets through
4 Runyan Tax Service. That company doesn't exist. It is
5 fake. Well, it is not fake. It actually belongs to Jack
6 Runyan, but this version of the company is fake.

7 Further evidence of Arthur's involvement is
8 the fact that IP address information ties back to his
9 home. He is the subscriber. The subscriber name is
10 Arthur Ayvazian. This is his IP address. That is his
11 subscriber address, 17450 Weddington Street. He applies
12 for the Anna Dzukaeva loan.

13 And we hear this name over and over again,
14 Anna Dzukaeva. She is the individual whose identity they
15 stole to file these loan applications that is charged in
16 the indictment.

17 Here are examples of PPP and EIDL loans that
18 tie back to Arthur Ayvazian's IP address at his
19 subscriber name at his subscriber address. And they
20 include the application for Vahe Dadyan, which they
21 helped him submit because it is a conspiracy and they are
22 working together.

23 Now, Arthur said Tamara did it; right? She
24 put stuff on his phone. They had similar things on the
25 phone, for sure. They had the Anna Dzukaeva IDs. And

1 you see that here.

2 This possession of this ID in furtherance of a
3 fraudulent act, a wire fraud or bank fraud count, that is
4 a crime. That is what is charged in the indictment. It
5 is count 24.

6 They also had checks. But notice, these
7 pictures are not identical. These are different pictures
8 of Anna Dzukaeva checks, and they are different checks as
9 well. And then you see they have information -- they
10 both have information on their phone showing that they
11 are applying and tracking PPP and EIDL loan applications.

12 But there are differences as well, differences
13 that are unique to Arthur's role. One of those is that
14 Arthur has information that can be used to create fake
15 IDs. Information like this, and this isn't theoretical.
16 This isn't something he may or may not have done. There
17 is evidence he actually did it. More evidence unique to
18 Arthur's phone showing people asking for IDs to be
19 created using particular information and then they file
20 the product.

21 There is more evidence as well. If you look
22 at the highlighted paragraph, "Please use an old Armenian
23 guy and please make his description match. Thank you."
24 And Arthur replies, "There is the ID." This is Arthur's
25 role. Not Tamara's role. This is Arthur's role. They

1 work together, no doubt. And you see in the text
2 messages what they worked together to do. But you also
3 see Arthur's unique role in this conspiracy. He is
4 responsible for parts of the assembly line for fraud,
5 these IDs.

6 Further evidence of the conspiracy is the fact
7 that, like with the other loans that we looked at, they
8 are using the same supporting documentation. Again,
9 summary chart Exhibit 116. You look at this and see that
10 they are using the same Form 940s down to the penny, and
11 this includes Arthur Ayvazian and Vahe Dadyan as well.

12 Now, Arthur Ayvazian took the stand. You
13 heard from him yesterday. He told his story. And he
14 explained to you all of the reasons why he won't trust
15 Tamara Dadyan.

16 The question was asked, "Is your wife, Tamara
17 Dadyan, involved in this trucking business at all?"

18 "No, not at all, sir. She is against it."

19 The question was asked, "Now, do you pay your
20 taxes together?"

21 He said, "No, sir."

22 Question, "Whose idea was that?"

23 "My idea."

24 "Why?"

25 "I didn't want to get involved in filing with

1 her."

2 He explains, "I moved out of the house right
3 away even though my lawyer told me not to, because I had
4 every right to be there and I just didn't want to see her
5 face anymore."

6 And then he goes on to explain that there are
7 times where there have been IDs on his phone, "And I
8 confronted her and she says, oh, that is for me. Erase
9 it or don't worry about it. You know, I don't need it
10 anymore." So Arthur says, "I end up erasing it."

11 Yet he trusted Tamara Dadyan to submit his PPP
12 and EIDL loan applications? He won't file taxes with her
13 but will have her do the paperwork for loans? It defies
14 common sense because it is not true.

15 "So I told Tammy, hey, do you think my company
16 will qualify, because I really need it right now."

17 "She says, yeah, I'll take care of it."

18 "She says, yes, I'll take care of it"

19 And I said "okay."

20 "She asked to see my 1099s." These are the
21 1099s -- he won't file taxes with her. She is not
22 involved in his business, but now he is just going to
23 hand everything over? It defies common sense.

24 He also told you he had a desperate, desperate
25 need for the funds for his business.

1 "2019, I did great. I made a lot of money in
2 2019, but as soon as 2020 came I went from making 130
3 something thousand to \$30,000. Once the pandemic hit, I
4 was just devastated. There were no jobs. The receivers
5 weren't working."

6 What do you need the money for? Well, since I
7 got the first one that came, he spent a lot of it towards
8 his business. He was behind in his trucking payments.
9 He's behind in repairs, he needs tires. Just a lot of
10 expenses toward the company.

11 Yet, he immediately spent his EIDL loan
12 proceeds on a Harley-Davidson and his brother Richard
13 Ayvazyan's 3.25 million-dollar mansion.

14 His explanation that he had desperate need for
15 the money for his business defies common sense. That is
16 not how his money was spent. It's not true.

17 We look at Vahe Dadyan. Vahe Dadyan had the
18 smallest role in the conspiracy. But it is significant,
19 because he lied on a PPP loan application, one
20 application for \$157,500 signed with his name in the name
21 of his company.

22 How do we know it is a conspiracy? Well, the
23 application was submitted by Tamara Dadyan. We saw that
24 earlier through the IP address information. And it was
25 using the same documentation that Arthur used for the

1 Allstate Towing.

2 Again, these are tax forms, Form 940s, with
3 the same financial information down to the penny because
4 they are fake.

5 Now, he gets all this money. It goes into his
6 account. If you look at the documents that are in
7 evidence, the bank records, what it shows is he is the
8 sole owner of this company and the signatory on this bank
9 account. It is his bank account. He controls it.
10 Nobody else.

11 What does he do with that money? He sends it
12 to Runyan Tax Services. Not Jack Runyan's Tax Service.
13 Victoria Kauichka's tax service. That company doesn't
14 exist. Victoria Kauichko, not a real person. Yet, Vahe
15 Dadyan sends the money there. What does he call it?
16 What does he say when he sent the money? He calls it
17 payroll. And, you know what, that was a lie, because it
18 wasn't.

19 What happens to that money? It doesn't go to
20 pay anybody. It goes to buy a house in the name of Iulia
21 Zhadko. This is evidence of conspiracy.

22 Now, Vahe Dadyan is prominently featured in
23 text messages between Richard Ayvazyan and Tamara Dadyan.
24 Why? Because he is insistent. He wants his cut, and he
25 wants it now.

1 If you look at the text messages, they talk
2 about how Vahe was pushing. "Rich, we've got to send him
3 his part here."

4 "How much?"

5 "I will tell you."

6 Where they going to send it? V&D Limo. Those
7 initials, Vahe Dadyan.

8 "Rich, let me know if you have checks for
9 deposit, if I can wire this out to Vahe -- part. He's
10 the type, wake up and checks account."

11 He is waking up and checking his account. He
12 wants his money. And then she says that in the text
13 below. "Please, like, he wakes up and tests me. LOL."

14 This is not a passive participant. This is
15 somebody who wants their cut. And these text messages,
16 these aren't between and amongst strangers. They are
17 between and amongst co-conspirators, people who are
18 working together for a common goal.

19 That goal is to defraud the SBA and the
20 lenders to get disaster relief funds that don't belong to
21 them, to which they are not entitled.

22 You then see these additional text messages.
23 They go back and forth all about wires.

24 "Send me the routing number for the Vahe
25 wire." And they provide the information. Then they try

1 to figure out how are they going to pay for it. They are
2 going to pay for it from Runyan.

3 Then they talk about the problems they are
4 encountering in terms of actually getting the wires to
5 work. Richard says, "Tammy, the limit is 25 a day." She
6 says, "Well, so then do Tuesday and Wednesday all from
7 the same place so I don't deal with him, please."

8 "Okay, Vahe can wait."

9 "Okay, I want a wire now." A wire for Vahe.

10 "What e-mail should I put for him?" This is
11 Vahe's e-mail. Vahe314@yahoo.com. It only allows -- "It
12 allows me only 25, so I sent 25. Do you want me to send
13 it to another place or can it wait?"

14 "Okay. Monday or you can give check. Art
15 will deport for him or whatever."

16 The money eventually gets to Vahe. He gets
17 his cut. And if you look at the bank records, he gets
18 the two \$25,000 payments because they are on different
19 days, just like they planned, because otherwise it
20 wouldn't work.

21 And where does this money come from? It comes
22 from a company that does not exist, Timeline Transport,
23 from an individual who is fake.

24 This is all evidence of conspiracy. The
25 defendants, if you look in the middle, well, Tamara

1 Dadyan called Vahe an idiot, so he must be. Well, Tamara
2 Dadyan called a lot of people idiots, and here are some
3 of the samples from the text messages. If you look
4 through those text messages, to Tamara Dadyan, anyone who
5 bothers her, who makes her day a little bit more
6 complicated is an idiot.

7 And you will see another word that is bandied
8 about as well. Moron. That is how she talks. It is
9 just what she says. Is that proof that Vahe Dadyan lacks
10 the intellectual capacity to commit fraud?

11 Look at the aggravated identity theft counts.
12 There are three.

13 Count 21, Richard Ayvazyan. You heard from
14 Mark Zindroski. He is one of the first witnesses we
15 called. He came up and testified from that stand. And
16 he told you he looked at this application and he laughed
17 because it is not him.

18 Somebody took his name and they submitted it
19 along with the name of his company that he owned, he
20 alone, owned for decades.

21 Iulia Zhadko, TQ Contracting.com. Look at the
22 phone number, 4170. It is the same phone number that
23 Tamara Dadyan is using to text Richard Ayvazyan. This
24 credit card was discovered in Richard Ayvazyan's luggage.
25 Top Quality Contracting, Iulia Zhadko.

1 Now, there is a question. Does Richard
2 Ayvazyan know that this man is real? Of course he does.
3 He targets the owners of local construction companies.
4 Here is a list of them.

5 This was found at 6150 Canoga. It is the
6 apartment that Victoria Kauichko pays for.

7 Count 22. This is the aggravated identity
8 theft count that ties back to that Nazar Terabelian.
9 There are credit cards discovered on Richard Ayvazyan's
10 phone in the name of Mod Interiors, the company that
11 Nazar Terabelian supposedly worked at after he died.

12 And Nazar Terabelian. There are notes that
13 talk about the application, Mod SBA, in the corner up
14 there, with statistics, business figures, financial
15 figures for a company that doesn't exist. E-mail
16 addresses for a man who is deceased. And bank accounts
17 as well.

18 Nazar Terabelian died on July 18, 2020. This
19 is his death certificate. Here is the application he
20 submitted for a PPP loan five days later. It is a fraud.
21 Someone took his identity and used it after he died. And
22 then they spent the money on themselves.

23 What did they spend it on? Furniture,
24 diamonds, gold coins. How many gold coins? Sixty.
25 Sixty gold coins. Thirty plus 30 equals 60. Where do we

1 find 60 gold coins? Richard Ayvazyan, Marietta
2 Terabelian's home.

3 Count 24. Artur Ayvazian, Anna Dzukaeva.
4 Anna Dzukaeva is a real person. We know that because the
5 witness from the Department of Homeland Security sat
6 there and testified to that fact, and we have documents.
7 Like Iulia Zhadko, the woman, not the fake man, she had
8 traveled to this country at one time. Foreign exchange
9 student. She was here for a while. She went back.

10 How does Artur Ayvazian know that she is real?
11 Well, there is evidence in his home that they are
12 collecting visas for foreign exchange students. These
13 are the individuals that they target in addition to the
14 local construction company owners.

15 This is the other type of people whose
16 identities they took. This is how you know that they
17 know that they are real.

18 These are the documents that were discovered
19 at Arthur's home. The applications with Anna Dzukaeva's
20 name on them. The images discovered in Artur Ayvazian's
21 phone. Her driver's license. Well, it is fake. And
22 there are two of them. And the two pictures are two
23 totally different individuals. And neither of them look
24 like the actual real Anna Dzukaeva, because that is
25 someone else who is in a foreign country right now.

1 Her checkbook. IP address information showing
2 that this loan application was submitted from Artur
3 Ayvazian's home, where he is the subscriber.

4 We now look at count 26. Count 26 is the
5 money laundering conspiracy. It is different than the
6 bank and wire fraud conspiracy, but it is also related.

7 Summary chart, Exhibit 115. If you look at
8 this exhibit, it will tell you everything that you need
9 to know. There are two objects here. One is
10 concealment. The other is spending.

11 These charts detail how the defendants in this
12 case concealed and spent the criminal proceeds. This
13 example is Vahe Dadyan, Richard Ayvazyan, Marietta
14 Terabelian using this PPP money, concealing it, and then
15 eventually spending it on a home purchased in the name of
16 Iulia Zhadko.

17 And again, this is the home where Marietta
18 Terabelian's mother pays for the utilities.

19 Here are additional co-conspirators. Anton
20 Kudiomov. That is Manuk Grigoryan teaming up with
21 Victoria Kauichko, with whom he shared the apartment.
22 They take the PPP and EIDL money. They buy another house
23 in the name of Victoria Kauichko.

24 And then we have the slide here that shows all
25 of the players in the conspiracy -- most of the players

1 in the conspiracy -- gathering their money, transferring
2 it to various accounts to conceal it, and ultimately it
3 is spent on a house for Richard Ayvazyan and Marietta
4 Terabelian.

5 And you have heard talk about Manuk Grigoryan.
6 This is the biggest prize, this house, \$3.25 million.
7 This tells you everything you need to know. If there is
8 any suggestion that it was Manuk Grigoryan who is behind
9 it all, why doesn't he live in this house. Why is it
10 Richard Ayvazyan and Marietta Terabelian's house?

11 It is because they are in charge.

12 More evidence of money laundering conspiracy.
13 Armin Hayrapetyan, who has a smaller role like Vahe,
14 sending money through various accounts. Sabala
15 Construction. That is one of the companies we just
16 talked about.

17 Where do you see that company? That name is
18 at Canoga, Manuk Grigoryan's apartment, and also the
19 apartment that Victoria Kauichko rented.

20 You also see that name at Weddington, where
21 Artur and Tamara live as well. They have Sabala
22 Construction checkbooks, and they also have a list of
23 different companies that include Sabala Construction.
24 The reason as to the overlap, it is because it is a
25 conspiracy.

1 Hart Construction. Same thing. They pooled
2 this money together, and what do they do? They pay three
3 individuals, Iulia Zhadko -- we all know who that is at
4 this point. The evidence shows -- the mountain of
5 evidence shows it is Richard Ayvazyan.

6 Fiber One. Fiber One is Victoria Kauichko.
7 Suzanna Merkuchian. It is also Richard Ayvazyan. We
8 know that because we saw the credit card that says Fiber
9 One Media. Richard Ayvazyan, that was in his possession.

10 Anna Manukyan. We also saw credit cards that
11 were in the possession of Richard Ayvazyan. We also see
12 credit cards that are in possession of Anna Manukyan
13 evidence with other co-conspirators as well.

14 The point is that Armin Hayrapetyan, the
15 individual who is moving this money, is giving this money
16 to the defendants sitting in this courtroom. It is not a
17 gift. It is a cut of the proceeds of the conspiracy.

18 Now, I don't think that any of this is really
19 in dispute. There is overwhelming evidence that all of
20 the loans that are detailed in the indictment, that they
21 all contain fraudulent information, information that
22 mattered to the SBA, information that mattered to the SBA
23 for lenders. And the reason we know that is because we
24 heard from them.

25 We asked them if this type of thing mattered

1 and they said that it does. This is additional evidence
2 of the bank fraud and the wire fraud.

3 Witnesses. You heard from witnesses from the
4 Internal Revenue Service. You heard from California EDD.
5 The DMV, DHS. You heard from Gusto. You heard victim
6 testimony from Mark Zindroski, Jack Runyan, Alexander
7 Farrer, saying that when their names were on these
8 documents it was because their names were stolen.

9 And then there is documentary evidence. There
10 are the bank records, the loan files, and then the
11 records from the various state and federal agencies that
12 further document the fact that the statements made in
13 these loan applications are false.

14 And I will take some time to just briefly go
15 through this.

16 Sabala Construction, this is one of the loans
17 that was taken out, the false and misleading statements.
18 They used the stolen identity Donald Sabala. They
19 misrepresented the payroll employees.

20 And there is a false certification regarding
21 the use of funds. We know what happened with the money
22 that went to Sabala Construction. It went to Richard
23 Ayvazyan and Fiber One Media.

24 Anna Manukyan. Allstate Towing and Transport.
25 This is Artur Ayvazian's company. He misrepresented his

1 payroll of his employees. It says in that application he
2 has 11 employees. He told you on the stand he doesn't
3 have 11 employees.

4 False certification regarding use of funds.
5 That money went to a Harley, went to his brother. And
6 there are fake IRS forms that were submitted in support
7 of that application that he wouldn't file taxes with his
8 wife, he said, but he let her handle these forms. Defies
9 common sense.

10 Top Quality Contracting. All you need to know
11 is that Mark Zindroski didn't submit this application.
12 That alone makes it fake. They also used a fake
13 California driver's license and fake IRS forms as well.

14 Comerica Bank. This is Tamara Dadyan's realty
15 company. Misrepresented the payroll, number of
16 employees, and a false certification regarding the use of
17 funds.

18 We know what happened to that money. That
19 money went to Richard Ayvazyan and Marietta Terabelian to
20 pay for their dream home.

21 The same thing with the second Secureline
22 Realty and Funding application. This time it also
23 contains fake IRS forms.

24 Redline Auto Collision. This was one of the
25 applications that was submitted in the name of Edward

1 Paronyan, who is one of the co-conspirators, using
2 documentation that was similar to documentation used by
3 the other co-conspirators because it all came from the
4 assembly line for fraud.

5 You know where his money went. Government
6 Exhibit 115, the summary chart exhibit, shows you exactly
7 where it went. And it wasn't for business expenses.

8 Same thing with the other Redline Auto
9 Collision loan. Voyage Limo \$157,500. It says here that
10 the number of employees is 11, like a lot of other
11 applications. But the evidence we presented shows that
12 that is not true.

13 There is a false certification regarding use
14 of funds. We know where that money went. Government
15 Exhibit 115. And fake IRS forms are submitted in
16 support.

17 All of these applications are fraudulent.

18 G&A Diamonds. This is Manuk Grigoryan's
19 father's company, Acacius(Phon.) Grigoroyan. Except it
20 is not really a company. It doesn't do anything anymore.
21 They misrepresented the payroll and the employees, and
22 there is a false certification regarding the use of
23 funds. This money goes to pay for Richard Ayvazyan's and
24 Marietta Terabelian's home. There are a couple of G&A
25 Diamond loans, and it is the same story. The one here

1 also has fake IRS forms and misrepresents payroll
2 employees as well.

3 Timeline Transport, we already spoke about
4 that. Iulia Zhadko, not a real person. The application
5 is clearly fraudulent. The company, fake. They don't
6 have employees. The use of funds was never for business
7 purposes. It was for Richard and Marietta's house.

8 Mod Interiors. This is the company that Nazar
9 Terabelian took over after he died. It is not real. The
10 money went to go buy diamonds and gold coins.

11 Anna Dzukaeva. We have spoken about Anna
12 Dzukaeva repeatedly, and she is not in the country. They
13 stole her ID and they submitted this loan.

14 Hart Construction, it is the same story. You
15 see Hart Construction listed on the evidence. This is
16 one of the local construction companies that they stole
17 the identities for as well.

18 And then there is Redline Auto Mechanics.
19 They used a fake identity, Anton Kudiomov. Fake
20 California driver's license. Fake IRS forms. And you
21 heard from Alexander Farrer [sic], who took the stand and
22 said that he never prepared these documents, but they
23 used his name anyway.

24 Runyan Tax Service. You heard from Jack
25 Runyan. He did not submit this application. He doesn't

1 know a Victoria Kauichko. She does not work for him.
2 That is because she is fake.

3 And then Turing Info Solutions. Turing Info
4 Solutions, we will look at this one more closely. Turing
5 Info Solution is Iulia Zhadko's company, except Iulia
6 Zhadko is not real. They used the fake driver's license,
7 fake IRS form, and the tax preparer is Jack Runyan.

8 So Jack Runyan gets hit twice. They take his
9 company name and then they sign his name to these forms
10 to say that he is responsible for them.

11 THE COURT: Let me ask you a question. Sorry to
12 interrupt. How much longer do you think you will be?
13 Just an estimate.

14 MR. FENTON: Ten minutes, 15 minutes the most.

15 THE COURT: I think we have to take a very short
16 recess. Five minutes. Sorry about that.

17 MR. FENTON: Okay.

18 (The following proceedings were held outside the
19 presence of the jury:)

20 THE COURT: Just one thing, Mr. Ram. You may be
21 seated, if you wish. You did submit what you announced
22 in open court for the Court's consideration yesterday
23 your outline of your argument. I won't get into that
24 because that was under seal and not to be discussed.

25 But there was one aspect in there, and I don't

1 know if that is your intention or not. As I told the
2 lawyers yesterday, and in particular, Mr. Mesereau, if
3 you intend to argue reasonable doubt in any way like your
4 notes, that would be impermissible.

5 MR. RAM: Yes. We changed that after your update,
6 your Honor. That has been changed.

7 (Recess from 11:06 to 11:14 a.m.)

8 (The following proceedings were held in the
9 presence of the jury:)

10 THE COURT: You can continue your argument,
11 Mr. Fenton.

12 MR. FENTON: Thank you, your Honor.

13 The last loan that I will talk about is Turing
14 Info Solutions. This loan was for \$384,150, submitted in
15 the name of Iulia Zhadko. And we spoke about Iulia
16 Zhadko quite a lot. Iulia Zhadko was a female foreign
17 exchange student whose identity was then taken, combined
18 with additional information, made into a synthetic
19 identity and turned into a male.

20 We have seen three different versions of that
21 identity used at this point. And this is one of the
22 applications that was submitted using the synthetic Iulia
23 Zhadko name.

24 There is a fake California driver's license.
25 We've showed you examples of these. Fake IRS forms, as I

1 said earlier. They took Jack Runyan's name, and not only
2 did she submit fraudulent PPP loan applications using his
3 name, they also used his name to create fake IRS tax
4 forms as well.

5 Now, with respect to these bank fraud and wire
6 fraud counts, they are different than the conspiracy
7 count. The conspiracy count -- count 1 alleges a
8 conspiracy. The individual wire and bank fraud counts
9 are substantive counts which are separate and apart from
10 the conspiracy counts as well.

11 This is what I was speaking about earlier when
12 I talked about being responsible, regardless of whether
13 you submit the actual application itself or cause it to
14 be submitted.

15 Under either circumstance, the government
16 alleges in the indictment that it would be sufficient
17 that some of these applications were caused to be
18 submitted by the defendants. They don't actually need to
19 submit them themselves.

20 The other thing that I just want to call your
21 attention to with respect to the individual wire fraud
22 and bank fraud counts is that with respect to these there
23 is something called aiding and abetting liability, which
24 Judge Wilson has already instructed you on and which
25 applies with respect to these particular counts.

1 We will now move onto counts 28 through 32.

2 After Richard Ayvazyan was arrested, he was
3 put on something called pretrial release. We had
4 testimony to that effect. When you are on pretrial
5 release, there are certain conditions. One of the
6 conditions is that you cannot commit additional crimes.

7 While on pretrial release awaiting trial, it
8 is alleged that Richard Ayvazyan engaged in money
9 laundering. The money laundering involved proceeds from
10 the PPP and EIDL loans that were deposited into the
11 Turing Info Solutions bank account.

12 This is a credit card discovered in Richard
13 Ayvazyan's luggage at the Miami International Airport
14 that shows that he had access to that account. It was an
15 account that was within his control.

16 We also know that Richard is in charge of this
17 identity because in the text messages with his
18 co-conspirator Tamara Dadyan, he actually shares this
19 information with her. He says, here, use this. The
20 owner is Iulia. And he gives the web address for Turing
21 Solutions and then also forwards along this piece of
22 paper.

23 This piece of paper contains a significant
24 amount of information relating to Turing Info Solutions
25 that could be used to do a variety of things like access

1 bank accounts, open bank accounts or apply for PPP or
2 EIDL loans.

3 Now, we know that the Coinbase accounts,
4 basically the money was taken and it was used to do a
5 couple of different things. The EIDL and PPL loan comes
6 in for Turing Solutions in August 2020. That money then
7 sits there for several months. It sits there until about
8 December, 2020.

9 And this is after Mr. Ayvazian is arrested and
10 while he is on pretrial release. There is one transfer
11 that goes, \$47,000 to Iulia Zhadko, JP Morgan account,
12 another transfer on December 22nd that goes to the Iulia
13 Zhadko account as well. And then that money is
14 subsequently transferred to an Ameritrade account.

15 Separate and apart from that, there is a
16 \$22,000 transfer that takes place from the Turing Info
17 Solutions account to the Coinbase account. And if we
18 look at who that Coinbase account is in the name of, it
19 is Iulia Zhadko.

20 There are two Coinbase accounts in the name of
21 Iulia Zhadko. There is an old account that links back to
22 this driver's license, which we have seen before, and
23 there is a new account that links back to this third
24 Iulia Zhadko driver's license. And this is the one that
25 receives the laundered criminal proceeds.

1 Now, we have spoken about the fact that
2 Richard Ayvazyan and Marietta Terabelian went to Turks
3 and Caicos in mid October. They were arrested upon their
4 return. And there is additional evidence further showing
5 the link between Richard's usage of the Iulia Zhadko name
6 in the form of bank records.

7 You heard special agent Clark testify about
8 these. When Richard Ayvazyan and Marietta Terabelian
9 were preparing to travel to Turks and Caicos on
10 October 9th, Iulia Zhadko controls this bank account at
11 Radius Bank, reaches out to Radius Bank and says, I want
12 to put a travel notice on my account.

13 And the bank representative asks what dates
14 will you be traveling and where will you be traveling to.
15 And the person who was pretending to be Iulia Zhadko says
16 October 10th through October 20th, Caribbean, Turks and
17 Caicos Islands.

18 And we see what they are doing when they are
19 in Turks and Caicos Islands. The text messages continue
20 between Richard Ayvazyan and Tamara Dadyan, and the text
21 messages are about the fraud.

22 He says:

23 "What's up, Tams? You up? I am three hours ahead
24 here. Text me when you get this. I made
25 introduction to escrow and said my attorney will

1 be handling the loan doc signing. Can you respond
2 from his e-mail" -- the attorney e-mail -- "and
3 ask them to send you the docs?"

4 And Tamara Dadyan replies, "Good morning from
5 Olaf e-mail." And he says "LOL." And this is where
6 Richard Ayvazyan is at the time that he is writing these
7 text messages. He is in Turks and Caicos on the beach in
8 the middle of a pandemic.

9 Iulia Zhadko. I'm sorry. He responds, "Good
10 afternoon -- afternoon, LOL." He then sends the Anton
11 Kudiomov e-mail address, and you have heard a lot about
12 that and who controls that account. Richard Ayvazyan is
13 the person who is e-mailing that e-mail address to Tamara
14 Dadyan.

15 And Tamara Dadyan says, "Reply to Olaf
16 e-mail." And, "Olaf got your e-mail but nothing."

17 And as you heard from Special Agent Clark, as
18 you see from the death certificate, the lawyer that
19 Richard Ayvazyan is talking about, Olaf Landsgaard, is
20 deceased. And he didn't die recently. He died years
21 ago. A year before his name was used in connection with
22 a real estate transaction to buy property in the name of
23 Anton Kudiomov, Olaf Landsgaard died.

24 There are additional text messages around this
25 time when he is in Turks and Caicos as well that continue

1 to talk about the fraud. They are talking about Sabala
2 Construction. "What is the Sabala Construction phone?
3 The 760, who answers it? I called that number. It said
4 Sabala Construction."

5 Richard Ayvazyan writes, "I don't recognize
6 that number. We had a different one. I think you call
7 the actual owner."

8 They know that they are stealing this
9 identity. They know that there is an actual owner.
10 Tamara Dadyan thinks it is a joke, "LOL, I know. I
11 called. Some girl answered, LOL."

12 Richard Ayvazyan responds, "I got rid of
13 everything on Sabala."

14 Tamara says, "Well, I said I had the wrong
15 number, LOL. Something with everything so we can pick up
16 the phone."

17 And Richard has a solution. He says, "Put Top
18 Quality Contracting." And if you recall, that company
19 belongs to Mark Zindroski, who took the stand, and has
20 belonged to him for decades. That is not Richard
21 Ayvazyan's company. That is Mark Zindroski's company.

22 Now, you have heard a little bit about Lamps
23 Plus, and there is the suggestion that Lamps Plus, that
24 there was a purchase at a Lamps Plus store on
25 October 14th. And, that, therefore, it is impossible

1 that Richard Ayvazyan is Iulia Zhadko or that he is using
2 that name.

3 If you look at the actual bank records, you
4 see here that that purchase was paid for using card
5 ending 3537. This is that card. It is in my hand. We
6 got it from Richard Ayvazyan. And we got it from him
7 when he came back through Miami International Airport and
8 was arrested on October 20th.

9 This card was in his possession. 3537. It
10 matches the number right there on the bank statement
11 because he is in control of the bank account, and he is
12 the one who made that purchase.

13 The last thing I will say on this is you
14 should really pay attention to these bank calls. They
15 tell you quite a bit. They tell you about state of mind
16 and they tell you about knowledge.

17 And I will end with this jail call from
18 Marietta Terabelian. She knows that they found the card.
19 She knows the charges. And she knows that there is
20 evidence of this crime. And what she says is that, "You
21 need to clean the house as much as you can." You need to
22 get rid of the evidence because they had been arrested.
23 "And you shouldn't say anything to anybody."

24 And that, members of the jury, that tells you
25 everything that you need to know about this crime and

1 this conspiracy.

2 Now, after considering all of the evidence we
3 will ask you to return the verdict that we think is
4 consistent with that evidence, which is the verdict of
5 guilty on all counts.

6 Thank you.

7 THE COURT: Thank you. Which of the defendants
8 wishes to argue first?

9 MR. LITTRELL: We do, your Honor.

10 Let's see if I can make this work.

11 There we go.

12 Morning, folks. I haven't had a great look at
13 you during the trial, especially those of you behind us.
14 I am John Littrell. I speak for Marietta Terabelian.

15 I don't want to take up too much of your time.
16 We have taken up a lot of it already. But I do want to
17 address the government's allegations against
18 Ms. Terabelian. Something struck me that I feel like we
19 have to address right away.

20 Mr. Fenton says this is an assembly line of
21 fraud, and it was an interesting analogy to use because
22 an assembly line, like he said, requires a lot of
23 different people doing a lot of different things. Each
24 person has a job and role and it is essential to the
25 fraud.

1 We didn't really see evidence of that in this
2 case. I am not even talking about Ms. Terabelian yet.
3 We didn't see evidence of the concept of an assembly
4 line. This is a fraud factory, and it is basically
5 located at the Weddington Street address, maybe the
6 Canoga Street apartment. And there is just no evidence
7 of any kind that Ms. Tarabelian individually had anything
8 to do with it.

9 Now, when he described this conspiracy and
10 everyone's roles, he was looking to find a role for Mary
11 Tarabelian. And that is what he has to do, because this
12 is a conspiracy. And if she is not a willful participant
13 in this conspiracy, if she doesn't have an active role,
14 then she is not guilty.

15 And so the role he picked for her was the role
16 of Victoria Kauichko. And I am going to talk a little
17 bit about who Victoria Kauichko is, but the overwhelming
18 evidence in this case shows that it is not Mary
19 Terabelian.

20 Before we get started, I want to briefly go
21 over how we make decisions in this case. One -- and
22 these are all in the jury instructions -- each defendant
23 has to be considered individually.

24 This is a conspiracy case and the prosecution
25 is going to try to lump everybody together. And they

1 used a lot of buzz words during their opening about that,
2 about everyone working together and doing their part, but
3 you actually have to decide what Ms. Terabelian did, what
4 she knew and what she intended.

5 Two, you must presume all of the defendants to
6 be innocent, which means that you have to be skeptical of
7 what the prosecution says.

8 We all want to believe that prosecutors tell
9 the truth. We all want to believe that their story is
10 based on the actual evidence. I don't think that bears
11 out in this case.

12 Three, the standard that you are applying to
13 decide what are the facts and what's going to be your
14 verdict is proof beyond a reasonable doubt.

15 Now, I am going to talk a little bit about
16 what that means. Proof beyond a reasonable doubt is
17 proof that leaves you firmly convinced. It is a very,
18 very high standard of proof.

19 It is hard to illustrate really what it means.
20 The jury instructions talk a little bit about it. And it
21 is also very hard for us as jurors to really think in
22 that way. We make decisions all the time. We rely on
23 incomplete facts all the time to make decisions about
24 what we are going to do, even really important decisions.

25 Your favorite restaurant, you go to it ten

1 times in a row. Every time it is good. It is reasonable
2 to conclude that when you go to it that 11th time, it is
3 going to be good. You don't go back in the kitchen to
4 see if the same cook is working or if they have had their
5 certificate updated. It is fair to assume and it is a
6 very reliable assumption that it is going to be good that
7 11th time.

8 That is not the way you can think about this
9 case. You have to check everything. You can't make any
10 assumptions, and you certainly can't assume that the
11 prosecutors are right.

12 And the best way to think about it is this.
13 Where there are two different conclusions that can be
14 reached based on the evidence, one that favors the
15 prosecution and the other that favors the defense, that
16 is the very definition of reasonable doubt.

17 Now, I am going to go through some of the
18 counts and the evidence in this case and talk about how
19 that --

20 THE COURT: The definition is the one I gave.

21 MR. LITTRELL: That is correct.

22 THE COURT: I mean, you can argue however you want
23 about the facts and it not amounting to reasonable doubt
24 or whatever or convert the meaning that it does amount to
25 reasonable doubt, but the instruction is the one I gave.

1 That is the instruction you are to follow.
2 And you can massage and use the evidence -- both sides
3 can -- in any way you want to show that the evidence in
4 your view doesn't support that burden.

5 MR. LITTRELL: Very well. And I guess the most
6 straightforward way of saying it is reasonable doubt is a
7 doubt that is reasonable. That there is an explanation
8 of the facts that is different from the prosecution's and
9 it is reasonable, that is reasonable doubt.

10 So here is the verdict form. You are going to
11 get a verdict form that is much more detailed, but this
12 is sort of a work sheet for us to use.

13 Interestingly, Ms. Terabelian is charged in
14 nearly every count. Even though there is not really
15 evidence that she did anything in this case, she is
16 charged on all the counts. And that is sort of how
17 conspiracies work, or at least that is how they are
18 charged.

19 I am going to go through these
20 chronologically, essentially from left to right. Before
21 we get there, bank fraud just to sort of go over the
22 broad strokes of it, bank fraud is submitting a fake
23 application to a bank. You know, an application that has
24 got false information or false names but it is not
25 submitted for the purpose it is intended for.

1 So when we get to a bank card, you have to
2 submit false information to a bank. Bank fraud applies
3 to people who apply for loans.

4 Wire fraud is essentially receiving money from
5 banks in response to those false applications for a loan.

6 THE COURT: Mr. Littrell, I am just informed from
7 the court reporter that you have to just slow down a bit.

8 MR. LITTRELL: I am so sorry.

9 THE COURT: Please continue. You don't have to
10 move any more quickly than you want to.

11 MR. LITTRELL: Thank you, your Honor.

12 So that is wire fraud. Receiving money from a
13 bank.

14 Aggravated identity theft, as I am going to
15 talk about in a moment, that is using or possessing the
16 identity of a real person in connection with a wire fraud
17 count. And what we are going to get to is that
18 Ms. Terabelian didn't commit any wire fraud counts, and
19 so she is not going to be guilty of aggravated identity
20 theft.

21 The government's case here is really based on
22 the notion of conspiracy. And the instructions you got I
23 think honestly are very confusing. They were read out
24 loud. You will have a copy of it. And I will get to
25 this later too.

1 They do not mean that someone who knows that a
2 conspiracy is happening or does something that
3 inadvertently aids the conspiracy is guilty. Conspiracy
4 can sound like you can assume people are guilty, but that
5 is not what it means. That is not how it works.

6 We will get to that in a minute.

7 Let's start with bank fraud. There is no
8 doubt about who is responsible for submitting the fake
9 applications to the banks. I agree with the government
10 on this point. Pretty much the whole story is in
11 government's Exhibit 10, and that is the text exchange
12 between Rich New and Tammy.

13 Basically what that text chain is is a
14 play-by-play analysis of who is doing what when and it is
15 a guide to just about everything in the case.

16 What you won't see anywhere is any reference
17 to Mary Terabelian. In fact, what you see is two spouses
18 committing fraud and keeping their significant others out
19 of it. So I just encourage you to read this carefully.

20 So she is not guilty of bank fraud because she
21 didn't submit any applications to a bank. It is just as
22 simple as that.

23 Now, what about wire fraud. Wire fraud, the
24 way you can figure out who is responsible for wire fraud
25 is to look at the actual bank accounts that received the

1 money. In this case, I put up a couple of exhibits, one
2 from Runyan Tax, one from Iulia Zhadko individually, and
3 the other are checks from a bank account associated with
4 Nazar Terabelian.

5 And here is what I am seeing. These are the
6 signatures associated with those accounts. So one thing
7 that I think you can reasonably infer is that Victoria
8 Kauichko, Iulia Zhadko and Nazar Terabelian for this
9 purpose are probably the same person, but in any case it
10 is not Mary Terabelian.

11 So that is why you have to find her not guilty
12 of all of the wire fraud counts.

13 Now, I left one blank. And that is because
14 there was one wire that went to Mary Terabelian's bank
15 account. If you remember, Ms. Robinson testified about
16 the flow of funds. And one of the things that you saw
17 and was pointed out to you is that Mary Terabelian,
18 although she is right here in the middle of the chart, is
19 different from almost everybody else.

20 It is a personal bank account signed by her,
21 no corporate entity associated with that bank account.
22 It is her personal bank account.

23 Now, the government says that Mary Terabelian
24 committed wire fraud when a wire came into her account on
25 June 17 of 2020. They have introduced no evidence at all

1 that she asked for that wire, that she knew that wire got
2 there. No evidence at all.

3 And the reason I wanted to point this out is
4 that this essentially is the government's money
5 laundering case against Ms. Terabelian. It is
6 essentially the only evidence. And it also relies on a
7 wire going from Ms. Terabelian's bank account to the
8 purchase of this home.

9 And we will get to that in a minute.

10 That is it.

11 So when the witness was testifying and said
12 let's take a look at this bank account that is so
13 important -- again, that is Mary Terabelian's signature.
14 It was opened in 2018.

15 Now, you will have a chance to look at this
16 when you deliberate. It is government's Exhibit 89. But
17 what you will see is this is the bank account of a
18 stay-at-home mom. The purchases that are being made from
19 this bank account are Postmates, Uber, Restoration
20 Hardware, things that you buy if you are a stay-at-home
21 mom which is Ms. Terabelian is.

22 Now, the government says, but wait a minute.
23 On June 19th, a wire went into this bank account. And
24 also, the total of those wires if you can see sum up to
25 \$577,000. That is a balance that is starkly in contrast

1 with what you see in this account otherwise.

2 Then, a couple of days later, a wire goes
3 right back out of that account. Oh, look at that. Goes
4 right back out of that account for \$565,000. Essentially
5 the money goes in, the money goes out.

6 Now, for Ms. Terabelian to be guilty of wire
7 fraud based on this wire that hit her account for three
8 days, she has to have known and willfully directed that
9 wire into the account and known and willfully directed
10 that wire out of the account.

11 There is just no evidence that she did that.

12 Now, we have missed -- now I am going to screw
13 this up.

14 Now, we have no obligation to produce evidence
15 or produce a defense at all. We don't have to explain
16 anything. But, you know, and keep in mind this proof
17 beyond a reasonable doubt. And the government hasn't
18 even come close for this bank statement.

19 But think about the context. This witness
20 admitted the way you control this bank account is with a
21 user name and a password. It is available online.

22 And she corrected herself. When the
23 government asked her who controls this bank account, I
24 objected. There was no foundation for that. The signer
25 does not control the bank account. The person who

1 controls the bank account is the person with the user
2 name and password. And there is no evidence that that
3 was Mary Terabelian in this case.

4 And keep in mind, this is a case where Richard
5 Ayvazyan has been accused of controlling other people's
6 bank accounts, moving money through other people's bank
7 accounts.

8 Now, if you had to pick somebody who was more
9 likely to be the person that initiated these wires and
10 you had to choose between Mary Terabelian and Richard
11 Ayvazyan, I think the choice would be clear.

12 So she is not guilty of any of the wire fraud
13 counts.

14 Now, this is interesting. Aggravated identity
15 theft is an account that relates to a wire that went into
16 the Mod Interiors bank account. Mod interiors is the
17 company associated with Nazar Terabelian. That is Mary's
18 father.

19 Now, I was waiting for the government to show
20 us some evidence that Mary Terabelian had anything to do
21 with that. And they just had their chance and they just
22 presented it to you. And if you recall what he
23 presented, they presented a bunch of notes on Richard
24 Ayvazyan's phone with log-in information and all kinds of
25 stuff about Nazar Terabelian.

1 If you look in the exhibits, you will also see
2 Nazar Terabelian credit cards and other information in
3 Richard Ayvazyan's possession. There is just nothing
4 like that in Mary Terabelian's possession.

5 So there is two alternatives for you to
6 consider. One, that five days after her father's death
7 and after she is grieving, she decides that she is going
8 to get into the PPP loan fraud business for the very
9 first time. That is a good time for her to get started.

10 Then she actually creates a bank account which
11 she then controls and commits wire fraud using her
12 father's stolen identity. That is the government's
13 theory.

14 The other is that it is her husband. The
15 person who had Nazar Terabelian's log-in information and
16 other notes in his phone, the person that has had his
17 credit cards, if you had to choose between either of
18 those alternatives, the choice would also be clear.

19 But again, the government didn't even argue
20 that she was responsible for it. So there is just
21 nothing for you to consider.

22 Now, they may come back and say, oh, well,
23 what we really meant to say is Mary Terabelian aided and
24 abetted her husband. And aiding and abetting is an
25 instruction that you are going to get.

1 But aiding and abetting doesn't just mean
2 married to somebody. It means you actually have to help
3 a person do that. And I don't think Richard Ayvazyan
4 needs any help committing bank fraud and wire fraud.

5 You know, look, there is just no evidence that
6 she is responsible. But one thing I wanted to put up is
7 a bank account in Nazar Terabelian's name, and the signer
8 in this case is Rich Ayvazyan.

9 So if the government is correct that the
10 signer of a bank account controls it, again, Richard
11 Ayvazyan is the prime suspect.

12 And so you don't -- we haven't really gotten
13 into reasonable doubt that much because the choices have
14 been relatively clear. You cannot convict somebody based
15 on a complete lack of evidence. And that is what we have
16 in this case.

17 And so the government's case, as it said in
18 the outset, really turns on conspiracy.

19 Now, this might take up a lot of your time
20 when you deliberate, reading those instructions, trying
21 to understand them, but here are the key things that you
22 can consider. I am hoping that we will make it somewhat
23 easier for you.

24 No matter what else those instructions say, to
25 be guilty of conspiracy you have to willfully participate

1 in a plan with the intent to advance the purpose of the
2 conspiracy. In this case the purpose of the conspiracy
3 is stealing PPP loan funds, stealing EIDL loan funds.

4 Now, if there is no evidence that Mary
5 Terabelian participated in any other way, then there is
6 no evidence that she is willfully participating in that
7 scheme.

8 You are also going to get an instruction that
9 if you think she is participating in some other scheme or
10 that she is guilty of something else, that does not allow
11 you to find her guilty of this conspiracy. And this
12 conspiracy is about PPP and EIDL loan funds.

13 The other is somebody who knows that a
14 conspiracy is happening -- or I'm sorry, who does not
15 know, but happens to act in a way that furthers that
16 conspiracy, is not guilty.

17 For example, if you don't know the money is
18 going through your bank account -- well, actually that
19 kind of assumes that she at least sent a wire, but in
20 this case there is just no evidence she did that either.
21 But had she done that, she still wouldn't be guilty if
22 she didn't know of the conspiracy.

23 I think the one that really sticks out and I
24 think is most important here is the last. A person does
25 not become a conspirator merely by associating with one

1 or more persons who are conspirators, nor merely by
2 knowing that a conspiracy exists.

3 And I think that if you take the government's
4 presentation and its evidence in the light most favorable
5 to them, you indulge presumptions for them, which again,
6 you can not do. At most it would show that -- the
7 government could at least argue that at some point she
8 knew.

9 The government could never argue and there is
10 no evidence to support the idea that she participated in
11 this conspiracy.

12 So here is what the case comes down to for
13 conspiracy. Three things.

14 This card found in Ms. Terabelian's carry-on
15 luggage in its own compartment.

16 Two, the jail call, which the government has
17 made sort of the core of its case.

18 And, three, a piece of paper found in her
19 phone.

20 Now, let's get to the bottom of it, because I
21 was prepared to -- you know, basically what the
22 government has done is they have said the reason
23 Ms. Terabelian is guilty is because she is Victoria
24 Kauichko. And that is just -- that is a concept that
25 they can't possibly prove.

1 As I have said, the signatures of Victoria
2 Kauichko and Iulia Zhadko were remarkably similar. So
3 one thing you can infer about who is Victoria Kauichko is
4 that they may very well be the same person. And if they
5 are the same person, it is not Mary Terabelian.

6 Now, Victoria Kauichko's checks with her
7 distinctive signature are found at the -- I believe that
8 is from Canoga -- from the Weddington house. Then these
9 are notes with Fiber One Media found at the Canoga
10 apartment.

11 Mary Terabelian didn't live at the Canoga
12 apartment. The Weddington Street address is the address
13 associated with Art and Tamara.

14 Now, the government says, well, guess what.
15 She must be Victoria Kauichko because this credit card
16 that we are going to talk about in a minute, that this
17 debit was found in her luggage in October 2020.

18 But here is the problem. The same credit card
19 was found in Richard Ayvazyan's phone along with lots of
20 other credit cards associated with Victoria Kauichko,
21 along with tons of other evidence, including the evidence
22 in the text messages between him and Tammy Dadyan.

23 So the idea that Mary Terabelian is Victoria
24 Kauichko is not only false, it is improbable. It is
25 impossible basically. And you can hold it against the

1 government that they are asking you to believe that she
2 is Victoria Kauichko.

3 If they are asking you to believe that Mary
4 Terabelian is Victoria Kauichko, you have every reason to
5 doubt everything else that they say.

6 Now, one thing we do know about Victoria
7 Kauichko, and this is sort of at the core of the
8 government's argument. Victoria Kauichko does make
9 purchases, and a lot of the time those purchases benefit
10 Mary Terabelian.

11 What do we make of that? I think that
12 Victoria Kauichko cares very much about Mary Terabelian.
13 I think that Victoria Kauichko may love her family too.
14 You will see that purchases are -- you know, again, these
15 are purchases by Victoria Kauichko that certainly benefit
16 Richard Ayvazyan, and not Mary Terabelian.

17 The one on the right is the text messages
18 between Richard Ayvazyan and the person at Gentleman
19 Timepieces. And he says, and the government emphasizes,
20 I want you to ship these watches to my wife, and my wife
21 is Victoria Kauichko.

22 And now for the first time in a fraud cause
23 where they are alleging that Mr. Ayvazian is submitting
24 false information, now they are saying, no, this time he
25 is right. This time he really means Victoria Kauichko is

1 his wife, and this is evidence that that means it must be
2 Mary Terabelian.

3 That is just nonsense. It is nonsense. And
4 you have every right to judge them for even asking you to
5 believe that.

6 Again, Victoria Kauichko pays for Nazar
7 Terabelian's funeral. I'm sorry. This is Iulia Zhadko
8 buys a house and next thing you know Mary Terabelian's
9 mom is either living there or at least paying the
10 utilities.

11 What this says about Victoria Kauichko is this
12 Victoria Kauichko loves Mary Terabelian, wants to protect
13 her. And that is consistent with the other evidence that
14 we have seen.

15 You have heard Artur Ayvazian testify that his
16 big brother had always looked out for him and supported
17 him financially. And the same is true for Rich Ayvazyan
18 and Mary Terabelian.

19 That does not make her guilty of conspiracy
20 because he is doing it by committing fraud.

21 Now, let's get to this debit card. Now,
22 again, the core of the government's case, one of three
23 pieces of evidence that directly ties in Mary Terabelian.
24 And rather than actually tell you what happened, I am
25 going to show you the video.

1 I am going to see if I can do it without
2 screwing it up completely.

3 So this is Mary Terabelian. You are going to
4 see here, this card is pulled out. She points to the
5 door. She nods her head. He confronts her again with
6 the card. Again she points to the door. Who is outside
7 that door? Richard Ayvazyan.

8 Now, she is not panicking. She is not
9 freaking out. She is just making a very straightforward
10 statement to that officer, this is not my card. Now,
11 that is the moment where the government had an obligation
12 to find out whether she was telling the truth.

13 And she had an opportunity to do that. And
14 the way they would do that is fingerprint the card,
15 investigate it. There is just no evidence they did any
16 of that.

17 So they have lost the right, for many reasons,
18 to tell you that her possession of this card in its own
19 compartment in her carry-on luggage, to which both Mary
20 Terabelian and Richard Ayvazyan had access, the
21 government has lost the right to be able to argue that
22 that means that she is Victoria Kauichko.

23 And make no mistake, that is what they are
24 saying. They are saying because she had this card on
25 October 19th, 2020, two months after this so-called

1 conspiracy ended, that that means that she must be
2 Victoria Kauichko. She must know what Victoria Kauichko
3 knows. That means that she submitted the loans, that
4 Victoria Kauichko's name is on it. That is just
5 nonsense.

6 Now, we get to the jail calls. And you heard
7 that you cannot -- you know, as we learned, Mary
8 Terabelian went to jail because of that credit card. So
9 she is confronted with this credit card. She denies that
10 it is hers, and the next thing you know she is in jail.

11 And she makes a call and she says a couple of
12 things that are absolutely true. We were caught. You
13 know, the interpreters took care to note when she said
14 "caught," it is capable of multiple meanings. It could
15 mean apprehended, arrested, detained. And he was careful
16 to do that because he didn't want to give a misleading
17 impression of what she meant.

18 They found a card, that is true. She knows
19 she is in jail because they found a credit card in
20 somebody's name that doesn't belong to here.

21 You know the charges. Now, the government
22 says, ah, this is it. You know the charges. That means
23 that she is signaling you know the charges because you
24 know that I am a criminal and you know what I have done
25 and I must be guilty.

1 Again, nonsense. She is in jail. She knows
2 the charges. Of course she has been given opportunities
3 to make other calls and tell the family. So if she is
4 informed of the charges and she tells her family what
5 they are, then of course she says "you know the charges."
6 She is asking for help. So it it doesn't tell us
7 anything.

8 "Please take care of the kids. Maybe you can
9 take them to mom's and they can stay over there until we
10 figure out what is going on."

11 "Clean the house." Clean the house is the
12 most difficult piece of evidence for us to confront in
13 this case. It makes her look guilty.

14 And I know why the government focused on it.
15 I know why they are building their case around it. It is
16 the biggest problem we have.

17 Now, you heard me cross-examine that
18 interpreter. And I tried to elicit some evidence that
19 really clean the house could have multiple different
20 meanings. I tried to speak Armenian. We all saw how
21 that went.

22 But at the end of the day it is reasonable for
23 you to conclude that this means exactly what the
24 government says it means.

25 In October 20th of 2020, two months after the

1 conspiracy is over and after she is caught with the
2 credit card in somebody else's name and she finds herself
3 in jail and she is separated from her kids and she
4 worries about them, she panics.

5 Maybe she is worried that they will find some
6 other evidence of stolen credit cards in her house. That
7 is a reasonable conclusion.

8 But here is the problem. It doesn't tell you
9 what she knew about this actual conspiracy. It shows
10 that she is responding to the fact that a credit card was
11 found in her luggage and she is panicked.

12 Now, just as Richard Ayvazyan protects her, it
13 is also reasonable to infer that she may be trying to
14 protect him in that moment. That doesn't make her guilty
15 of the conspiracy that is charged to her. That makes her
16 guilty of very bad judgment. That is not a reason to
17 convict her in this case.

18 Now, this is an instruction you are going to
19 get. You are here only to determine whether defendants
20 are guilty or not guilty of the charges in the
21 indictment.

22 The defendants are not on trial for any
23 conduct or offense that is not charged in the indictment.
24 What that means is that if you think that she panicked
25 and she actually tried to get somebody to hide evidence

1 in this case, that does not make her guilty of this
2 conspiracy. That makes her guilty of being a panicked,
3 concerned mom.

4 Now, here is the last one. What I view as a
5 desperate attempt to find some evidence to prove that
6 Mary Terabelian is Victoria Kauichko, which remember, is
7 the government's theory. They seize her phone.

8 Now, they seize Richard Ayvazyan's phone, and
9 they find all kinds of stuff on there. On Mary
10 Terabelian's phone, we see from this image there are
11 44,000 images. There are tons of text messages, tons of
12 passwords. There is a vast trove of evidence on this
13 phone. And they are looking for something to pin Mary
14 Terabelian to this conspiracy.

15 What they find is one image that was taken on
16 October 28th, 2018, two-and-a-half years before this
17 conspiracy began.

18 Now, the government says these are all fake
19 companies, but they have not established that this was a
20 fake company in 2018. But most importantly, they haven't
21 established how that image got on Mary Terabelian's
22 phone, whether she ever saw it, who put it there and what
23 it means.

24 You cannot convict her based on an image that
25 was taken on 2018 on a different phone and finding its

1 way into the thousands of images on her current phone.

2 We heard evidence that images are stored
3 chronologically. Images from two and a half years ago,
4 you would have to scroll through images for days just to
5 even find it if you knew what you were looking for.

6 So that just isn't enough to convict her. But
7 think about this, and think about the caliber and quality
8 of the evidence they have presented against Mary
9 Terabelian, what it means, what they are asking you to
10 infer from it.

11 They are asking you to infer that she is a
12 willful, active participant in this conspiracy because of
13 these three pieces of evidence.

14 And it is just not enough.

15 It comes down to this card, which was never
16 fingerprinted, and in a single compartment in her
17 carry-on luggage, a jail call that happened two months
18 after the conspiracy was over, and an image on her phone
19 that was taken two-and-a-half years before.

20 It is just not enough.

21 Mary Terabelian is here because she is married
22 to Richard Ayvazyan. And I get it. The government gave
23 a long introduction to its closing about how egregious
24 this case is.

25 These are loans that were meant for small

1 businesses in the middle of a pandemic. There was a big
2 conspiracy. There was a lot of people involved.

3 I understand the government's urge to make
4 this case as big as it can be and involve as many people
5 as they can, but that doesn't make Mary Terabelian
6 guilty.

7 So I would ask you to please carefully follow
8 your instructions and talk to each other, remembering the
9 burden of proof beyond a reasonable doubt, what that
10 means is that if you have a reasonable doubt, it might be
11 different from somebody else's. The whole purpose of
12 deliberating is to talk it through.

13 Some of you may think a piece of evidence
14 means something different from somebody else. Talk about
15 it. And the instructions say and you should take
16 seriously that if it causes to you change your
17 perspective, you should do it.

18 But one thing I have noticed is that if jurors
19 are deliberating and they see things in a different way,
20 in a sense that is reasonable doubt right there, the fact
21 that somebody sees something differently from the way you
22 see it. That itself can be reasonable doubt.

23 Now, you also will get an instruction that
24 Mary Terabelian didn't testify, didn't have to testify,
25 and that you can't hold that against her. That is a very

1 difficult instruction to follow.

2 It is natural for us to assume that a
3 defendant who is innocent would get up and tell you,
4 would testify. That is natural. But in a case like
5 this, with evidence like this, why would a defendant take
6 the stand?

7 It is a dangerous place to be. The
8 prosecutors can cross-examine the defendant. Then you
9 look at that defendant and you decide you don't like the
10 way she looks. You don't like what she is wearing. It
11 places her at tremendous risk.

12 And I say this only to say you cannot hold
13 against her the fact that she did not testify. You
14 cannot draw any assumptions from it.

15 And I am particularly concerned about this in
16 this case because one defendant did testify. She is here
17 because she is married to Richard Ayvazyan, and really no
18 other reason.

19 So I respectfully ask you to find her not
20 guilty of all counts.

21 THE COURT: Okay. I think it is almost -- what
22 time is that?

23 Is it five to 12:00 -- did I read that right?

24 I think it is probably best to take the lunch
25 break and then we will come back at 1 o'clock and we will

1 hear from the counsel for the other defendants. Then the
2 government has a chance to make a rebuttal.

3 So, again, don't talk about the case to each
4 other, and we will see you back promptly at 1:00 o'clock.

5 (Luncheon recess from 11:56 a.m. to 1:00 p.m.)
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CERTIFICATE

I hereby certify that pursuant to Section 753, Title 28,
United States Code, the foregoing is a true and correct
transcript of the stenographically reported proceedings held
in the above-entitled matter and that the transcript page
format is in conformance with the regulations of the
Judicial Conference of the United States.

Date: June 25, 2021

/s/ Katie Thibodeaux, CSR No. 9858, RPR, CRR

MR. FENTON: [4] 34/8 78/13 78/16 79/11 MR. JOHNSON: [2] 8/13 8/22 MR. LITTELL: [8] 8/2 8/5 9/1 87/8 90/20 91/4 92/7 92/10 MR. MESEREAU: [3] 10/9 10/18 10/22 MR. PAETTY: [3] 5/15 5/21 5/25 MR. RAM: [7] 8/24 9/2 9/6 9/8 9/24 10/1 79/4 MS. AHN: [8] 6/5 6/7 6/20 7/6 7/9 7/12 7/15 9/14 THE CLERK: [1] 6/3 THE COURT: [34] 5/7 5/19 5/23 6/1 6/6 6/18 7/5 7/8 7/10 7/13 8/1 8/4 8/12 8/20 8/23 9/5 9/7 9/22 9/25 10/3 10/6 10/10 10/19 11/1 78/10 78/14 78/19 79/9 87/6 90/19 90/21 92/5 92/8 112/20	28/20 30/6 14 [1] 3/10 30/5 1400 [1] 2/10 14th [1] 85/25 15 [1] 78/14 157,000 [1] 60/2 17 [1] 94/25 17450 [2] 55/24 60/11 18 [17] 6/15 19/7 19/9 23/11 24/20 25/6 27/11 27/21 27/25 28/11 28/17 28/19 28/20 29/19 30/5 31/25 69/18 1900 [1] 2/15 1935 [1] 3/12 1956 [7] 6/10 6/16 27/11 27/21 28/11 30/15 30/19 1957 [2] 27/24 29/19 19th [2] 95/23 105/25 1:00 [1] 113/5 1:00 o'clock [1] 113/4 1st [1] 1/22	41 [1] 45/4 426 [1] 42/4 47/10 68/22 4311 [1] 1/22 44,000 [1] 109/11
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