

1 TRACY L. WILKISON
United States Attorney
2 SCOTT M. GARRINGER
Assistant United States Attorney
3 Chief, Criminal Division
SCOTT PAETTY (Cal. Bar No. 274719)
4 CATHERINE AHN (Cal. Bar No. 248286)
BRIAN FAERSTEIN (Cal. Bar No. 274850)
5 Assistant United States Attorneys
Major Frauds/Environmental and Community Safety Crimes Sections
6 1100/1300 United States Courthouse
312 North Spring Street
7 Los Angeles, California 90012
Telephone: (213) 894-6527/2424/3819
8 Facsimile: (213) 894-6269/0141
E-mail: Scott.Paetty@usdoj.gov
9 Catherine.S.Ahn@usdoj.gov
Brian.Faerstein@usdoj.gov

10 JOSEPH S. BEEMSTERBOER
Acting Chief, Fraud Section
Criminal Division, U.S. Department of Justice
11 CHRISTOPHER FENTON
Trial Attorney, Fraud Section
12 Criminal Division, U.S. Department of Justice
1400 New York Avenue NW, 3rd Floor
14 Washington, DC 20530
Telephone: (202) 320-0539
15 Facsimile: (202) 514-0152
E-mail: Christopher.Fenton@usdoj.gov

16 Attorneys for Plaintiff
17 UNITED STATES OF AMERICA

18 UNITED STATES DISTRICT COURT

19 FOR THE CENTRAL DISTRICT OF CALIFORNIA

20 UNITED STATES OF AMERICA,

21 Plaintiff,

22 v.

23 RICHARD AYVAZYAN,
aka "Richard Avazian" and
24 "Iuliia Zhadko,"
MARIETTA TERABELIAN,
25 aka "Marietta Abelian" and
"Viktorika Kauichko,"
26 ARTUR AYVAZYAN,
aka "Arthur Ayvazyan,"

27 Defendants.
28

No. CR 20-579(A)-SVW-1-2-3

GOVERNMENT'S REQUEST TO DISMISS
INDICTMENT (ECF 32) AS AGAINST
DEFENDANTS RICHARD AYVAZYAN,
MARIETTA TERABELIAN, AND ARTUR
AYVAZYAN PURSUANT TO FEDERAL RULE
OF CRIMINAL PROCEDURE 48(a)

PROPOSED ORDER FILED CONCURRENTLY

1 Plaintiff United States of America, by and through its counsel
2 of record, the United States Attorney for the Central District of
3 California and Assistant United States Attorneys Scott Paetty,
4 Catherine Ahn, and Brian Faerstein, and Department of Justice Trial
5 Attorney Christopher Fenton, hereby requests pursuant to Federal Rule
6 of Criminal Procedure 48(a), and by leave of the Court, to dismiss
7 the initial indictment in the above-captioned case (ECF 32), as
8 against defendants Richard Ayvazyan, Marietta Terabelian, and Artur
9 Ayvazyan.

10 In support of this request, the government states as follows
11 based on the files and records in this case:

12 1. On November 17, 2020, a federal grand jury returned a 12-
13 count indictment against defendants Richard Ayvazyan, Marietta
14 Terabelian, Artur Ayvazyan, and Tamara Dadyan (hereinafter the
15 "Initial Indictment"). (ECF 32.)

16 2. On March 9, 2021, the grand jury returned a 33-count first
17 superseding indictment against the original four defendants along
18 with new defendants Manuk Grigoryan, Arman Hayrapetyan, Edvard
19 Paronyan, and Vahe Dadyan (hereinafter the "First Superseding
20 Indictment"). (ECF 154.)

21 3. On November 15, 2021, defendants Richard Ayvazyan,
22 Marietta Terabelian, and Artur Ayvazyan were sentenced by the Court
23 following their convictions at trial. (See ECF 644, 1166, 1169.¹)

24 4. At the conclusion of the November 15, 2021 sentencing
25 hearing, the government did not request leave of Court to dismiss the
26 Initial Indictment as to defendants Richard Ayvazyan, Marietta

27 ¹ The Court's minute entry for defendant Artur Ayvazyan's
28 sentencing hearing has not yet been entered on the ECF docket.

1 Terabelian, and Artur Ayvazyan. Because the government proceeded to
2 trial against these three defendants on the charges in the First
3 Superseding Indictment (ECF 154), and the defendants were convicted
4 of charges alleged in the First Superseding Indictment, the
5 government hereby requests leave of Court to dismiss, pursuant to
6 Federal Rule of Criminal Procedure 48(a), the charges in the Initial
7 Indictment (ECF 32) as against defendants Richard Ayvazyan, Marietta
8 Terabelian, and Artur Ayvazyan.

9 Dated: December 2, 2021

Respectfully submitted,

10 TRACY L. WILKISON
United States Attorney

11 SCOTT M. GARRINGER
12 Assistant United States Attorney
13 Chief, Criminal Division

14 /s/
SCOTT PAETTY
15 CATHERINE AHN
16 BRIAN FAERSTEIN
Assistant United States Attorneys
17 CHRISTOPHER FENTON
Department of Justice Trial Attorney

18 Attorneys for Plaintiff
19 UNITED STATES OF AMERICA
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