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13 Counsel for Artur Ayvazyan

14 UNITED STATES DISTRICT COURT
15 CENTRAL DISTRICT OF CALIFORNIA

16 UNITED STATES OF AMERICA,
17 Plaintiff,
18 v.
19 ARTUR AYVAZYAN
20 Defendant.

Case No. 20-CR-00579-SVW

**ARTUR AYVAZYAN'S
SECOND MOTION TO
CONTINUE THE DATE FOR
SURRENDER TO THE
BUREAU OF PRISONS**

(No Hearing Requested)

21 Artur Ayvazyan, by and through counsel, hereby move this Honorable
22 Court to extend the surrender date of January 3, 2022 to March 5, 2022. On
23 November 15, 2021 Artur Ayvazyan was sentenced to 60 months in prison. The
24 Court ordered a surrender date of January 3, 2022. On December 6, 2021, the
25 Court sentenced Artur Ayvazyan's wife Tamara Dadyan to 130 months in prison.
26 Tamara Dadyan was ordered to surrender on or before January 5, 2021. Artur
27 Ayvazyan requires more time to get his family's affairs in order before his
28 children lose both of their parents for several years. Specifically, Artur
Ayvazyan's disabled mother Zhaneta Momdzayan has lost her caretaker, and

1 Artur Ayvazyan has had to step in to provide her care until another caretaker can
2 be found. Efforts to find a caretaker since the prior caretaker quit in November
3 have not been successful – due in part to the holiday season. Ms. Momdzayan
4 has diabetes, is blind in one eye, has little sight left in the remaining eye, has high-
5 blood pressure, nerve damage, stomach issues, and requires extensive daily care.
6 She must be provided with multiple medications and supplements over the
7 course of each day to keep her health in check. She also requires someone to
8 bathe her, feed her, do her shopping. As Richard Ayvazyan cannot be located,
9 Artur Ayvazyan is the only child Ms. Momdzayan has left to see to her care.
10 AUSA Ahn has advised that the Government opposes this motion.

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12 Dated: December 22, 2021

Respectfully submitted,

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14 /s/ Jennifer J. Wirsching _____
Jennifer J. Wirsching
15 Counsel for Artur Ayvazyan

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DECLARATION OF JENNIFER J. WIRSCHING

1. I, Jennifer J. Wirsching, an attorney licensed to practice law before all the courts of the State of California, the Central District of California, the Eastern District of California, the Northern District of California, the Southern District of California, the District of Colorado, the Ninth Circuit Court of Appeals, the Tenth Circuit Court of Appeals, am one of the attorneys of record for Artur Ayvazyan.
2. Artur Ayvazyan was sentenced to 60 months in the Bureau of Prisons.
3. The Court ordered Ayvazyan to surrender no later than January 3, 2022.
4. Artur Ayvazyan's wife, Tamara Dadyan was sentenced on December 6, 2021 to 130 months' imprisonment.
5. Tamara Dayan has been ordered by the Court to surrender on or before January 5, 2022.
6. Zhaneta Momdzayan is Artur Ayvazyan and Richard Ayvazyan's mother.
7. I am informed and believe that Artur Ayvazyan requires more time to settle the family's affairs prior to both parents being imprisoned.
8. I am informed and believe that Artur Ayvazyan's mother Ms. Momdzayan suffers from diabetes as well as other medical issues.
9. I am informed and believe that Artur Ayvazyan's mother Ms. Momdzayan has lost her vision in one eye and has limited vision in the other eye.
10. I am informed and believe that Artur Ayvazyan's mother Ms. Momdzayan's caretaker quit in mid-November.
11. I am informed and believe that Artur Ayvazyan's mother Ms. Momdzayan requires someone to provide her medications and supplements to her multiple times per day.
12. I am informed and believe that Artur Ayvazyan has been taken over the care of his mother since her caretaker left her job.

1 13. I am informed and believe that Artur Ayvazyan's care includes the
2 bathing, feeding, shopping, providing medications and supplements
3 for his mother.

4 14. I emailed AUSA Catherine Ahn and advised her of this motion and
5 asked to know if the Government would oppose the motion or not.

6 15. AUSA Ahn advised me that the Government opposes this request.

7 16. I have personal knowledge of the facts stated above unless stated as
8 made upon information and belief.

9 I declare under penalty of perjury that the foregoing is true and correct.

10 December 22, 2021

/S/Jennifer J. Wirsching
Jennifer J. Wirsching
Attorney for Artur Ayvazyan