

1 TARIK S. ADLAI, SBN 165454
LAW OFFICES OF TARIK S. ADLAI
2 65 No. Raymond Avenue, Suite 320
Pasadena, California 91103
3 Tel: (626) 578-7294
Fax: (626) 685-2562
4 E-mail: tadlai@adlailaw.com

5 Attorney for Defendant
ARTUR AYVAZYAN

7 UNITED STATES DISTRICT COURT
8 CENTRAL DISTRICT OF CALIFORNIA

9
10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 v.
13 ARTUR AYVAZYAN,
14 Defendant.

Case NO. 20-CR-00579-SVW
EMERGENCY APPLICATION
TO SET SURRENDER DATE

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16 TO THE HONORABLE STEPHEN V. WILSON, UNITED STATES
17 DISTRICT JUDGE, ALL PARTIES AND THEIR ATTORNEYS OF
18 RECORD:

19 Defendant Artur Ayvazyan, by and through his attorney Tarik S. Adlai,
20 respectfully hereby applies ex parte for an emergency application to set a
21 surrender date. This application is necessary because he has been denied bail
22 pending appeal but his surrender date has expired and, at the Government's
23 behest, probation has instructed him to surrender "immediately," with no
24 opportunity to arrange his affairs and at the risk of unfairly treating him as a
25 untimely surrender by BOP, adversely affecting his designation.
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Respectfully submitted,
Law Offices of Tarik S. Adlai

DATED: January 28, 2022.

/s/ Tarik S. Adlai
TARIK S. ADLAI, Esq.
Attorney for Defendant
Artur Ayvazyan

At the time of sentencing, this Court denied the Government's motion to remand and allowed Mr. Ayvazyan to surrender the first week of January 2022. In December 2021, this Court denied Mr. Ayvazyan's motion for bail on appeal. Mr. Ayvazyan's appellate counsel filed a motion for bail in the Ninth Circuit that automatically stayed his surrender. Ninth Cir. R. 9-1.2(e).

The Ninth Circuit denied Mr. Ayvazyan's motion for bail on appeal on January 27, 2022. On the morning of January 28, 2022, Mr. Ayvazyan's probation officer directed Mr. Ayvazyan to surrender by noon, with no time to get his affairs in order, including the care and placement of his two teen daughters and his brother's three children who he voluntarily took responsibility for in his brother's absence.

This Court has found Mr. Ayvazyan neither a flight risk nor a danger and has agreed he is a good candidate to allow to self-surrender. A four-hour notice to surrender is extremely disruptive and entirely unnecessary.

Respectfully submitted,
Law Offices of Tarik S. Adlai

DATED: January 28, 2022.

/s/ Tarik S. Adlai
TARIK S. ADLAI, Esq.
Attorney for Defendant
Artur Ayvazyan

DECLARATION OF TARIK S. ADLAI

1 I, Tarik S. Adlai, declare:

2 1. I am an attorney, duly licensed and authorized to practice law
3 before all courts of the State of California and am a member of the bar of this
4 Court. I am counsel for Artur Ayvazyan, the defendant herein. The facts
5 contained in this declaration are true based on the papers, pleadings, and
6 records on file in this case, are personally known to be to be true, or I am
7 informed and believe them to be true. If called as a witness, I could and
8 would competently testify thereto.

9 2. The facts contained in the accompanying motion are true.

10 I declare under penalty of perjury that the foregoing is true and that this
11 declaration was executed this 28th day of January 2022, at Aspen, Colorado.

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13 _____/s/ Tarik S. Adlai

14 TARIK S. ADLAI
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