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Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. RICHARD AYVAZYAN, aka "Richard Avazian" and "Iuliia Zhadko," MARIETTA TERABELIAN, aka "Marietta Abelian" and "Viktoria Kauichko," ARTUR AYVAZYAN, aka "Arthur Ayvazyan," and TAMARA DADYAN, MANUK GRIGORYAN, aka "Mike Grigoryan," and	No. CR 20-579(A)-SVW GOVERNMENT'S PROPOSED VOIR DIRE Trial Date: June 15, 2021 Time: 8:30 a.m. Location: Courtroom of the Honorable Stephen V. Wilson

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

Defendants.

Plaintiff United States of America, by and through its counsel of record, the Acting United States Attorney for the Central District of California, Assistant United States Attorneys Scott Paetty, Catherine Ahn, Brian Faerstein, and Department of Justice Trial Attorney Christopher Fenton, respectfully requests that the Court ask prospective jurors the questions submitted herein in addition to the Court's regular voir dire questions.

Dated: June 8, 2021

Respectfully submitted,

TRACY L. WILKISON
Acting United States Attorney

BRANDON D. FOX
Assistant United States Attorney
Chief, Criminal Division

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

Attorneys for Plaintiff
UNITED STATES OF AMERICA

GOVERNMENT'S REQUESTED VOIR DIRE

I. The Indictment

1. The government has read a portion of its indictment. Is there anything about the charges in this case that makes you unwilling or reluctant to serve as a juror?

II. Experience with Financial Institutions, Lenders or Processors, the SBA, and the PPP and EIDL Programs

2. Have you, a family member, or a close friend ever worked for a bank, lender, loan processor, or other financial institution? To your knowledge, did that involve making or processing PPP loans?

3. Have you, a family member, or a close friend ever worked for the United States Small Business Association ("SBA")? To your knowledge, did involve processing PPP or EIDL loans?

4. You may hear testimony from representatives of a bank, lender, loan processor, or other financial institutions, as well as the SBA. Have you had any experiences with any bank, lender, loan processor, or other financial institution that would make it difficult for you to evaluate that testimony fairly and impartially? Have you had any experiences with the SBA that would make it difficult for you to evaluate that testimony fairly and impartially?

5. You may hear testimony in this case that SBA-administered programs like the PPP or EIDL lost money through PPP or EIDL loans. Is there anything about your personal dealings with any bank, lender, loan processor, or other financial institution that would affect your ability to serve as a fair and impartial juror in such a case? What about with the SBA?

6. Have you applied for PPP or EIDL funds? If so, please provide details.

7. Do you think you could be fair and impartial in weighing the evidence in a case in which a victim is a bank or other financial institution?

8. Do you think you could be fair and impartial in weighing the evidence in a case in which the government is a victim?

III. Experience with Identity Theft

9. Have you, a family member, or a close friend ever been the victim of identity theft or the unauthorized use of personal information? Please provide details. Is there anything about that experience that would interfere with your impartiality in this case? (If you would like, you may request we speak in the jury deliberation room to answer this question.)

10. Have you, a family member, or a close friend ever been the victim of the theft of, or the unauthorized use of, business or financial information? Please provide details. Is there anything about that experience that would interfere with your impartiality in this case? (If you would like, you may request we speak in the jury deliberation room to answer this question.)

IV. Experience with Fraud

11. Have you, a family member, or a close friend ever been the victim of fraud? Please provide details. Is there anything about that experience that would interfere with your impartiality in this case? (If you would like, you may request we speak in the jury deliberation room to answer this question.)

V. Experience with Law Enforcement

12. Have you, a family member, or a close friend ever been arrested, charged, or convicted of any crime? If so, what was the crime? How was it resolved? Would that experience affect your

ability to be a fair and impartial juror in this case? (If you would like, you may request we speak in the jury deliberation room to answer this question.)

13. Have you, a family member, or a close friend ever had a negative or an unpleasant experience with law enforcement? If so, what happened? Would that experience affect your ability to be a fair and impartial juror in this case?

14. Have you, or has anyone close to you, ever been falsely accused of committing a crime?

15. Have you, or has anyone close to you, ever filed a lawsuit or complaint concerning the conduct of a law enforcement officer?

16. You may hear testimony in this case from federal law enforcement agents. Is there anything that you have experienced, seen, heard, or read about that would prevent you from considering their testimony fairly and impartially?

17. Do you have any opinions or feelings about the criminal justice system, such as judges, prosecutors, defense lawyers, and law enforcement officers, that would make it difficult for you to be a fair and impartial juror in this case?

VI. Knowledge of Potential Witnesses

18. Do you know or are you familiar with any of the following individuals, who may be witnesses in this case? [The government respectfully requests the Court read the government's and defendants' witness lists.]

VII. Punishment and Sympathy

19. Have you previously served in a jury for a criminal or civil case? What was the result?

20. Do you have any reservations about sitting in judgment of an accused person and returning a verdict in a criminal case?

21. There are some people who, for moral, ethical, or religious reasons, believe that it is not proper or who would find it difficult to pass judgment on the conduct of others. Do any of you hold such a belief, or might you be affected by such beliefs?

22. The potential punishment for the charged offenses is a matter that the jury should never consider in arriving at an impartial verdict. If you are selected as a juror, can you put aside any concerns you may have about potential punishment in arriving at a fair and impartial verdict in this case?

23. If the Court instructs you that your verdict must not be based on sympathy, passion, or prejudice, but only on the evidence in this case and on the law as the Court instructs you on it, will you be able to follow that instruction?

24. Knowing what you now know about this case, do you have any reservations about your ability to hear the evidence, deliberate with your fellow jurors, and return a fair and impartial verdict?

VIII. Ability to Serve

25. Do you have any difficulty understanding the English language or seeing or hearing things in the courtroom that could impair your ability to be a juror in this case?

IX. COVID-19 Considerations

26. Do you have concerns about safely serving on a jury over the course of multiple days? Would those concerns affect your ability to be a fair and impartial juror in this case? (If you would like, you may request we speak in the jury deliberation room to answer this question.)

27. Do you have safety concerns about deliberating with other jurors in the same room? Would those concerns affect your ability to be a fair and impartial juror in this case? (If you would like, you may request we speak in the jury deliberation room to answer this question.)

28. Would you have safety concerns if the Court permitted fully-vaccinated attorneys or witnesses to speak without a mask? Would those concerns affect your ability to be a fair and impartial juror in this case? (If you would like, you may request we speak in the jury deliberation room to answer this question.)

29. Are you willing to wear a mask, face shield, use wipes and hand sanitizer, respect social distancing, and take other Centers for Disease Control, Department of Public Health, or court-mandated safety precautions during the course of this trial? (If you would like, you may request we speak in the jury deliberation room to answer this question.)

30. Have you, a family member, or a close friend, ever been arrested, cited, or charged with failing to adhere to mandated COVID-19-related safety protocols, including but not limited to wearing a mask, abiding by curfew, and social distancing? (If you would like, you may request we speak in the jury deliberation room to answer this question.)