

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
EDVARD PARONYAN,  
  
Defendant.

No. CR 20-00579-SVW-7

[PROPOSED] PRELIMINARY ORDER OF  
FORFEITURE PURSUANT TO PLEA  
AGREEMENT AS TO PERSONAL  
PROPERTY

Upon consideration of the application of Plaintiff, United States of America, for a preliminary order of forfeiture pursuant to the plea agreement of, and guilty plea to Counts One and Twenty-six of the First Superseding Indictment entered by, defendant EDVARD PARONYAN, and, good cause appearing thereon, IT IS HEREBY ORDERED:

**I. FORFEITABLE PROPERTY**

For the reasons set out below, any right, title and interest of defendant Edvard Paronyan in the following described property (hereinafter, the "Forfeitable Property") is hereby

1 forfeited to the United States. The Court finds that the  
2 government has established the requisite nexus between the  
3 Forfeitable Property and the offenses described in Counts One  
4 and Twenty-six of the First Superseding Indictment, which charge  
5 defendant with 18 U.S.C. § 1349 (conspiracy to commit bank and  
6 wire fraud) and 18 U.S.C. § 1956(h) (conspiracy to commit money  
7 laundering). The Forfeitable Property is more particularly  
8 described as:

9 a. \$74,557.79 in bank funds seized from Bank of America  
10 account number ending in 7695 held in the name of Allstate  
11 Towing & Transport LLC;

12 b. \$65,990.43 in bank funds seized from Bank of America  
13 account ending in 9700 held in the name of Runyan Tax Service  
14 Inc.;

15 c. \$451,185.00 in U.S. Currency seized on November 5,  
16 2020, in various areas and backyard of a Tarzana, California  
17 residence;

18 d. One Santos De Cartier stainless steel wrist watch,  
19 model 4183, serial number 163389YX;

20 e. One Audermars Piguet, Royal Oak 18 carat rose gold  
21 wrist watch, model 26331, serial number J52335 seized on  
22 November 5, 2020 in various areas and backyard of a Tarzana,  
23 California residence;

24 f. One Rolex Datejust stainless steel wrist watch, model  
25 126334, serial number 4U95Z313 seized on November 5, 2020 in  
26 various areas and backyard of a Tarzana, California residence;  
27  
28

1 g. One Audemars Piguet, Royal Oak Offshore black ceramic  
2 wrist watch, serial number K23313 seized on November 5, 2020 in  
3 various areas and backyard of a Tarzana, California residence;

4 h. One Audemars Piguet Royal Oak Offshore black ceramic  
5 wrist watch, serial number LU44845K seized on November 5, 2020  
6 in various areas and backyard of a Tarzana, California  
7 residence;

8 i. One Rolex Day-Date watch, serial number W44P7238  
9 seized on October 20, 2020 at the Miami International Airport  
10 from Richard Ayvazyan and Marietta Terabelian;

11 j. Sixty Gold Bullion Coins seized on November 5, 2020 in  
12 various areas and backyard of a Tarzana, California residence;

13 k. One 14 carat yellow gold 24" neck chain seized on  
14 October 20, 2020 at the Miami International Airport from Richard  
15 Ayvazyan and Marietta Terabelian;

16 l. One Pair of 14 carat white gold earrings with diamond  
17 stud seized on October 20, 2020 at the Miami International  
18 Airport from Richard Ayvazyan and Marietta Terabelian.

19 **II. IMPLEMENTATION**

20 IT IS FURTHER ORDERED as follows:

21 A. Upon the entry of this Order, and pursuant to Fed. R.  
22 Crim. P. 32.2(b)(3) and 21 U.S.C. § 853, the United States  
23 Attorney General (or a designee) is authorized to seize the  
24 Forfeitable Property.  
25

26 B. Upon entry of this Order, the United States is further  
27 authorized to conduct any discovery for the purpose of  
28 identifying, locating, or disposing of the Forfeitable Property

1 subject to forfeiture pursuant to this Order, 21 U.S.C. § 853(m)  
2 and Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure.  
3 "Any discovery" shall include all methods of discovery permitted  
4 under the Federal Rules of Civil Procedure.

5 C. Upon entry of this Order (and at any time in the  
6 future after amendment of the applicable order of forfeiture in  
7 this matter), the United States Attorney General (or a designee)  
8 is authorized to commence any applicable proceeding to comply  
9 with statutes governing third party rights, including giving  
10 notice of this and any other Order affecting specific property.  
11 The following paragraphs shall apply to any ancillary proceeding  
12 conducted in this matter:

13 (1) Pursuant to 21 U.S.C. § 853(n)(1) and  
14 Supplemental Rule G(4)(a)(iv)(C) of the Supplemental Rules for  
15 Admiralty or Maritime Claims and Asset Forfeiture Actions, the  
16 government shall forthwith publish for at least thirty (30)  
17 consecutive days on an official government website notice of  
18 this order and any other Order affecting the Forfeitable  
19 Property, and notice that any person, other than the defendant,  
20 having or claiming a legal interest in the property must file a  
21 petition with the Court within thirty (30) days of the  
22 publication of notice or receipt of actual notice, whichever is  
23 earlier. The United States shall also, to the extent  
24 practicable, provide written notice to any person known to have  
25 an alleged interest in the Forfeitable Property.

26 (2) Any person other than defendant EDVARD PARONYAN  
27 ("defendant") asserting a legal interest in the Forfeitable  
28 Property may, within thirty days of the publication of notice or

1 receipt of notice, whichever is earlier, petition the court for  
2 a hearing without a jury to adjudicate the validity of his or  
3 her alleged interest in the property, and for an amendment of  
4 the order of forfeiture, pursuant to 21 U.S.C. § 853(n)(2).

5 (3) Any petition filed by a third party asserting an  
6 interest in the Forfeitable Property shall be signed by the  
7 petitioner under penalty of perjury and shall set forth the  
8 nature and extent of the petitioner's right, title, or interest  
9 in such property, the time and circumstances of the petitioner's  
10 acquisition of the right, title or interest in the property, any  
11 additional facts supporting the petitioner's claim, and the  
12 relief sought. 21 U.S.C. § 853(n)(3).

13 (4) The United States shall have clear title to the  
14 Forfeitable Property following the Court's disposition of all  
15 third-party interests or, if no petitions are filed, following  
16 the expiration of the period provided in 21 U.S.C. § 853(n)(2)  
17 for the filing of third party petitions.

18 D. Pursuant to Fed. R. Crim. P. 32.2(b)(3) and  
19 defendant's consent, this Preliminary Order of Forfeiture shall  
20 become final as to defendant EDVARD PARONYAN upon entry and  
21 shall be made part of his sentence and included in his judgment.

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1 E. The Court shall retain jurisdiction to enforce this  
2 Order, and to amend it as necessary, pursuant to Fed. R. Crim.  
3 P. 32.2(e).

4 DATED: \_\_\_\_\_  
5 HONORABLE STEPHEN V. WILSON  
UNITED STATES DISTRICT JUDGE

6 PRESENTED BY:

7 TRACY L. WILKISON  
8 Acting United States Attorney

9 SCOTT M. GARRINGER  
Assistant United States Attorney  
10 Chief, Criminal Division

11 /s/Brent A. Whittlesey  
BRENT A. WHITTLESEY  
12 Assistant United States Attorney  
13 Asset Forfeiture Section

14 Attorneys for Plaintiff  
UNITED STATES OF AMERICA