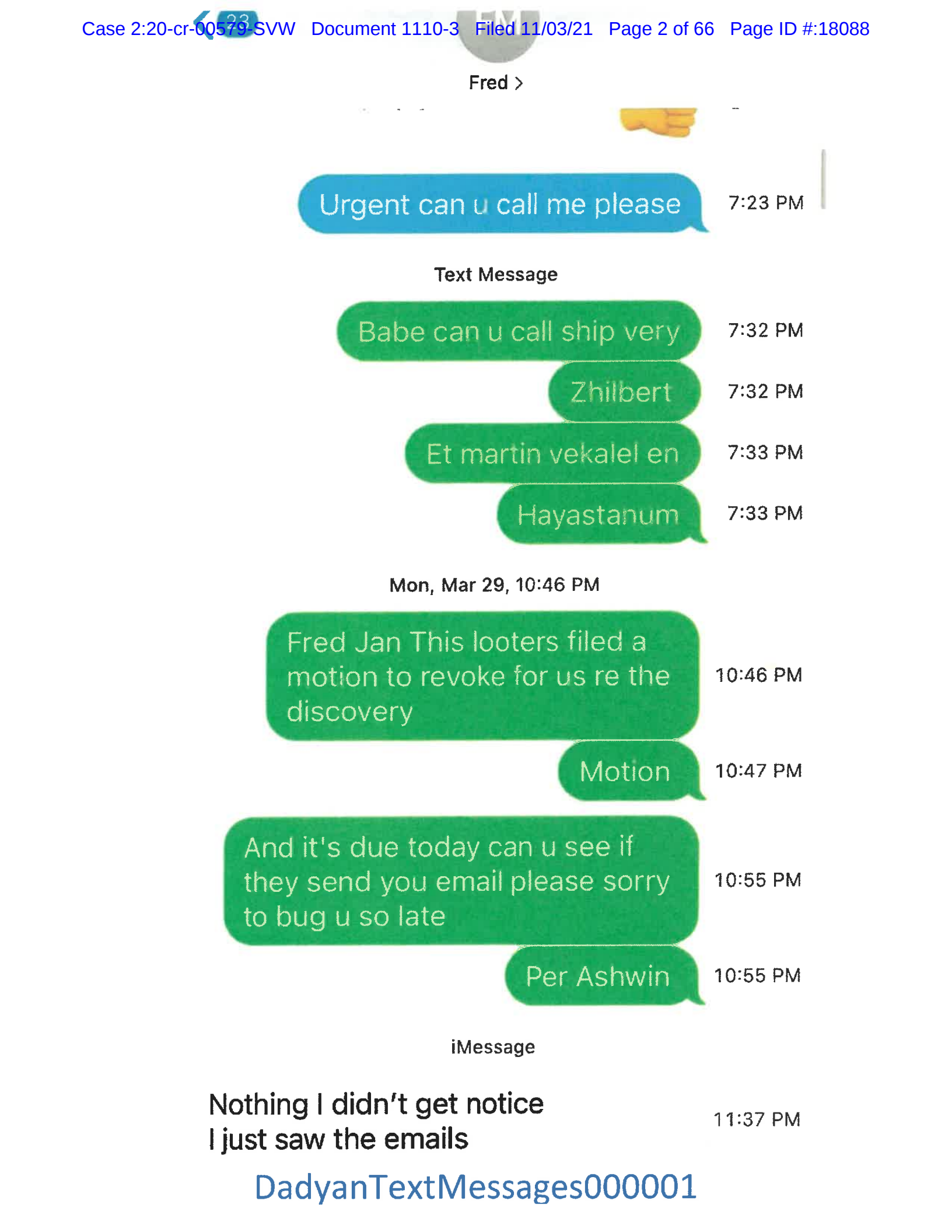
EXHIBIT C


Fred >
Urgent can u call me please
7:23 PM
Text Message
Babe can u call ship very
7:32 PM
Zhilbert
7:32 PM
Et martin vekalel en
7:33 PM
Hayastanum
7:33 PM
Mon, Mar 29, 10:46 PM
Fred Jan This looters filed a motion to revoke for us re the discovery
10:46 PM
Motion
10:47 PM
And it's due today can u see if they send you email please sorry to bug u so late
10:55 PM
Per Ashwin
10:55 PM
iMessage
Nothing I didn't get notice
I just saw the emails
11:37 PM

Fred >

t of Justice
l Floor

l@usdoj.gov

S DISTRICT COURT

ISTRICT OF CALIFORNIA

No. CR 20-579(A)-SVW

GOVERNMENT'S *EX PARTE* APPLICATION FOR MODIFIED PROTECTIVE ORDER; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION OF BRIAN FAERSTEIN; EXHIBITS

[PROPOSED] MODIFIED PROTECTIVE ORDER FILED CONCURRENTLY HEREWITH

[PROPOSED] ORDER REGARDING CLAW-BACK OF CONFIDENTIAL DISCOVERY FROM DEFENDANTS FILED CONCURRENTLY HEREWITH

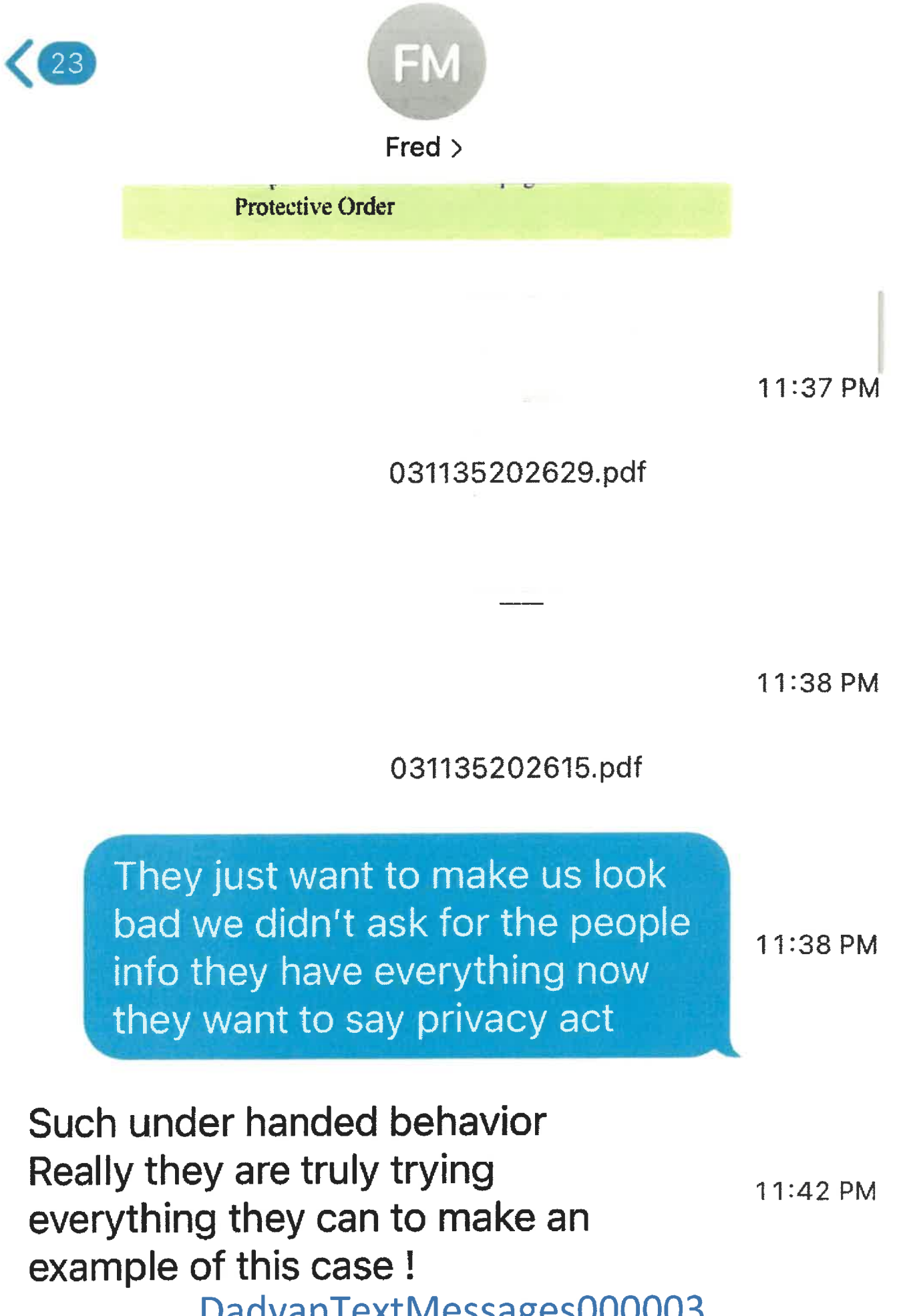
11:37 PM

11:37 PM

031135202614.pdf

219	Main Document	29 pages
1	Declaration	4 pages
2	Exhibit 1	7 pages
3	Exhibit 2	1 page
4	Exhibit 3	1 page
5	Exhibit 4	1 page
6	Exhibit 5	1 page

DadyanTextMessages000002


23
FM
Fred >
Protective Order
11:37 PM
031135202629.pdf
11:38 PM
031135202615.pdf
They just want to make us look bad we didn't ask for the people info they have everything now they want to say privacy act
11:38 PM
Such under handed behavior
Really they are truly trying everything they can to make an example of this case !
11:42 PM

Fred >

Ashwin filing a opposition right now I'll get the copy so we file too he said we need to appose and they operantly made Ashwin look bad they attached him in one of the papers I don't know u know this people dramatic 😂

11:54 PM

Yup
On it

11:55 PM

Mom and dad got the Covid 2

12:02 AM

The 2nd variant

12:02 AM

Oh wow 😳

12:03 AM

Crazy

12:03 AM

Are you going to get tested

12:18 AM

No I had it already lol I'm going to be fine if this Palmerton don't kill me 😂

12:21 AM

Lol 😂

12:22 AM



Ok I will reach out to him tomorrow

Tue, Mar 30, 12:35 PM

Did u talk to zhilbert his on docet

Fred Jan sorry I'm Putting u through this mess seriously I'm speechless like one after another

It's ok jan
I am here for you
What happened

Nothing just like all this commin my way at once

Yup exactly we will get through it

I'm waiting for the word version of the reply for the government opposition and for me and art and the new one filed yesterday

I'll send u once I get

FM

Fred >

W

4:16 PM

Response_to_Gov_t_Ex_P...

This is emergency reply completed Ashwin says we need do reply me too it's specifically for me and rich

4:16 PM

Tell me if u want me to fix the details

4:17 PM



4:20 PM

2021-03-29_DE_222_Joi...

Let me know if we need to join it or prepare our own and also all exhibit send by Ashwin regarding Richard

4:22 PM

Nothing pertains to me per the look of it

4:23 PM

We are on it

4:36 PM

Fred >

Fred 6:45 PM

Did he call u 6:45 PM

No he didn't 6:45 PM

What can blow the state case away 6:46 PM

In your opinion 6:46 PM

He will call me don't worry 6:46 PM

The lack of evidence
It's a fishing expedition 6:47 PM

Other than that 6:47 PM

Payments were made 6:48 PM

Wed, Mar 31, 11:32 AM

Morning please get InTouch with Jennifer for the joint reply for the property return. 11:32 AM

We are on it spoke to her yesterday 11:33 AM
We have joint defense call at 3pm

Thu, Apr 1, 12:00 PM

Morning Fred Jan the judge set a hearing date for tomorrow

Thu, Apr 1, 3:05 PM

I have to say tomorrow that I never saw the discovery

And I don't have acess just FYI

So I couldn't have possibly used anything from there

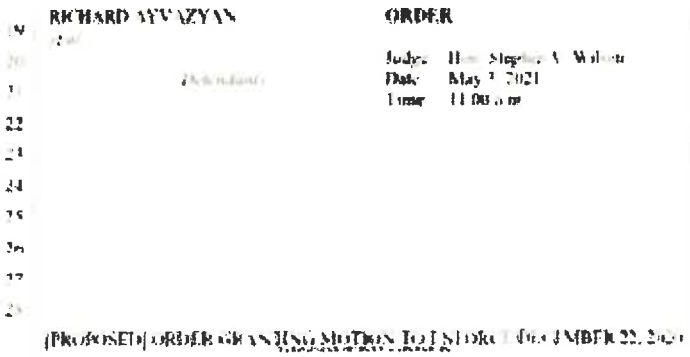
Ok

Thu, Apr 1, 8:07 PM

Fred Jan can u talk for a second

The emails I send to the Minassian lady ?

Because that's what I was fighting foe

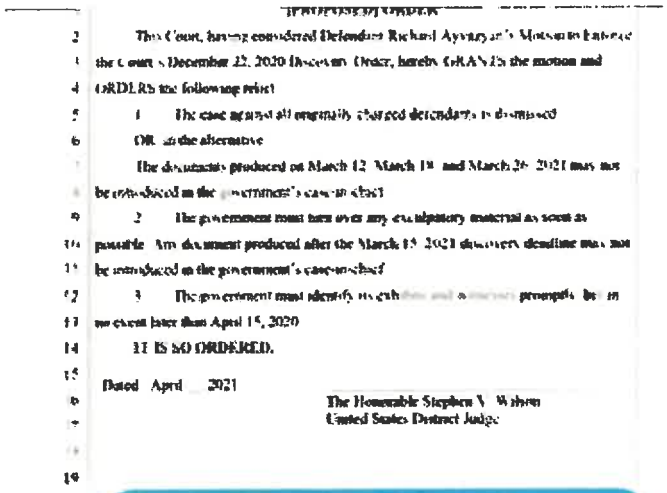

RICHARD AYVAZYAN

ORDER

Judge:
Date: May 3, 2021
Time:

(PROPOSED) ORDER GRANTING MOTION TO [illegible]

Fred >



This Court, having considered Defendant Richard Ayvazyan's Motion to Enforce the Court's December 22, 2020 Discovery Order, hereby GRANTS the motion and ORDERS the following relief:

1. The case against all originally charged defendants is dismissed

OR, in the alternative

The documents produced on March 12, March 19, and March 26, 2021 may not be introduced in the government's case-in-chief

2. The government must turn over any exculpatory material as soon as possible. Any document produced after the March 15, 2021 discovery deadline may not be introduced in the government's case-in-chief

3. The government must identify its witnesses and witness prompts by in no event later than April 15, 2020

IT IS SO ORDERED.

Dated: April , 2021

The Honorable Stephen V. Wilson
United States District Judge

9:03 PM

Fred Ashwin just filed this — 9:03 PM

Yes we haves talked about this — 9:04 PM

Lol is it hood ?? — 9:05 PM

Good ? — 9:05 PM

Yes it's a tactical move — 9:05 PM

Have u ever seen it get granted? — 9:06 PM

Fri, Apr 2, 11:35 AM

Fred I'm on I see u — 11:35 AM

U see me — 11:35 AM

Good — 11:45 AM

This guy is a looser — 12:34 PM

Fred

iMessage
Tue, Apr 6, 3:02 PM



Wed, Apr 7, 12:32 PM

Fred Jan good afternoon can you please have Evelyn review your email I send her the 3 forms that Jennifer did for Arts seizure I put all my seizures information on it needs to be on your letterhead please have her email me so I can go to fed ex to them

Fred

Read my email response

Ashwin has nothing to do with me claiming my money that they took from my bank accounts

Athur claimed his funds from bofa if I don't claim it it will be Forfeited

This is for my First Republic Bank and Bank of the West money they took

Let me figure it out
Will call you back

Thu, Apr 8, 9:08 AM

Good morning
Call me please

Fred >

Fri, Apr 9, 12:56 PM

Fred Jan happy Friday

I asked the Bail guy if it's ok for Greg to do his refi and he said

I totally hear you just rate and term, but you'll need the court subordinate to the new lender and the court will not accommodate. Let me double check with fiscal. However, any changes must be approved by the ausa and ultimately the court via a stipulation and order. You can also have Fred inquire with the ausa.

Happy Friday
Please don't touch it!

I know babe

But I feel bad

I know please let's not mess with the bonds

Fred >

Fred Jan please do talk to that Sevak guy, per Jerry the guys is mot moving forward but we need both to be in touch Sevak and Jerry, and he left him message last week

Please for me

Ok 👌

Sun, Apr 11, 10:05 PM

[redacted]

031135277189.pdf

Fred Jan please don't forget to file hounded for

Joinder

U think it's too late

We have already filed a Joinder

Ok maybe showing yet

Sun, Apr 11, 11:15 PM

7:28

23

FM

Fred

Mon, Apr 12, 10:53 AM

Please don't Forget to talk to Sevak too please today is the April 12 so we don't have surprises please he needs to touch base with Jerry

Ok 👌

Mon, Apr 12, 1:02 PM

Fred Jan to I put ESQ 170974

Or BSN

Put
Law offices of Fred G Minassian
Bar no
Address

Ayvazyan, Artur Forfietur...

Like that ?

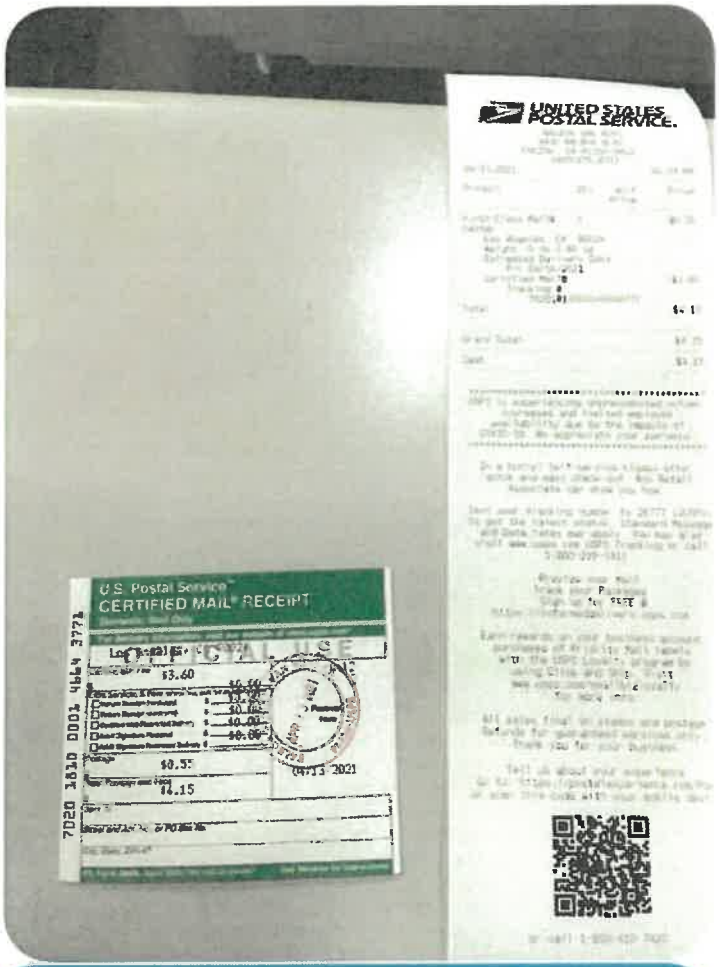
Perfect

Fred >

Tue, Apr 13, 12:19 PM

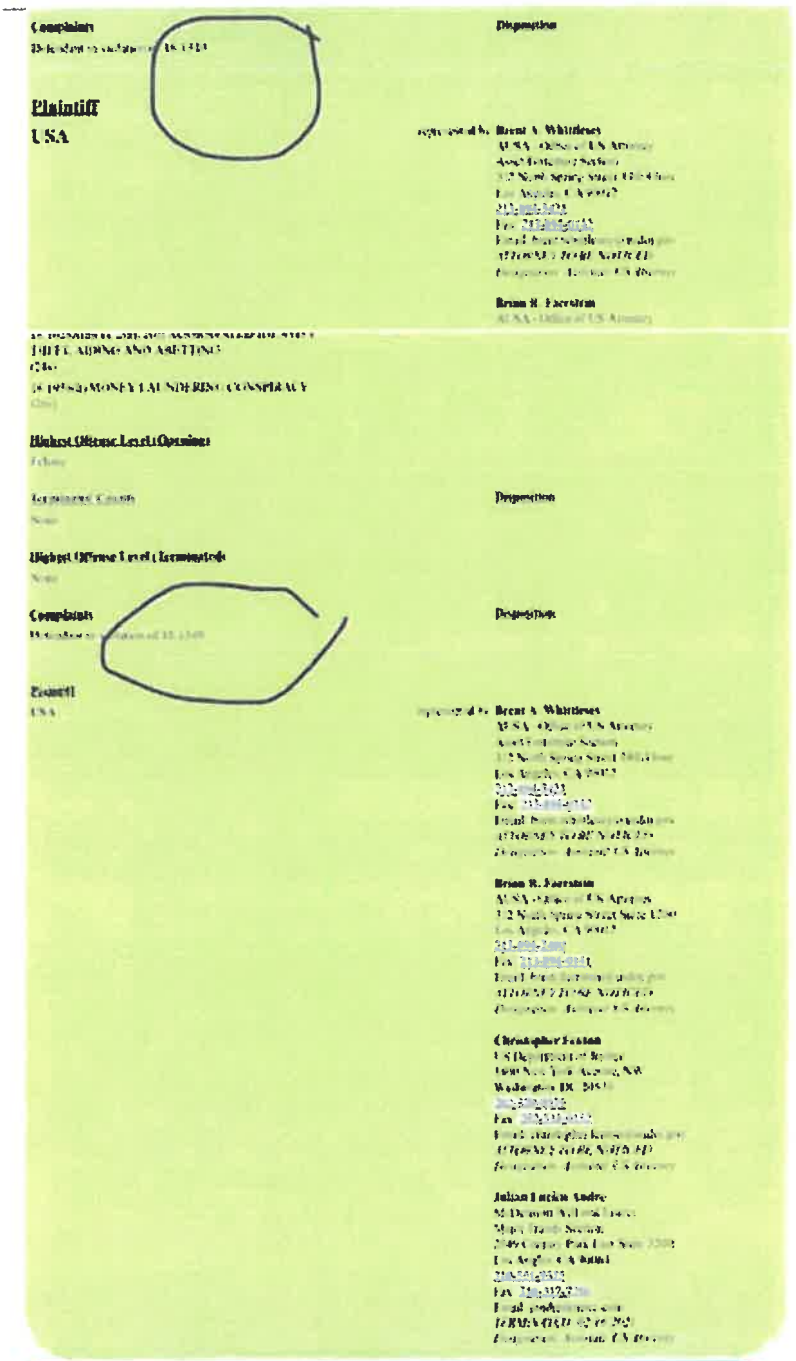
Fred Jan please can you please have that guy Sevak return Jerry's call he has t called back since last week he just needs to be on same page as him that's it we're bot asking for anything

Call me please



Just send to the department of justice

Fred >



Morning babe is this what u talking about seems like richard me art we all have that

Thu, Apr 15, 9:55 AM

Good morning
What I told you is moving forward

Fred >

But this paper is stupid look I never took $120 cash I got a cashiers check

3:52 PM

And then send to Richard

3:53 PM


CASHIER'S CHECK

000500703

DATE 5/26/20

*****136,000 DOLLARS AND 00 CENTS

$ *****136,000.00

ABC REALTY ADVISORS INC.
MEMO: PAYROLL

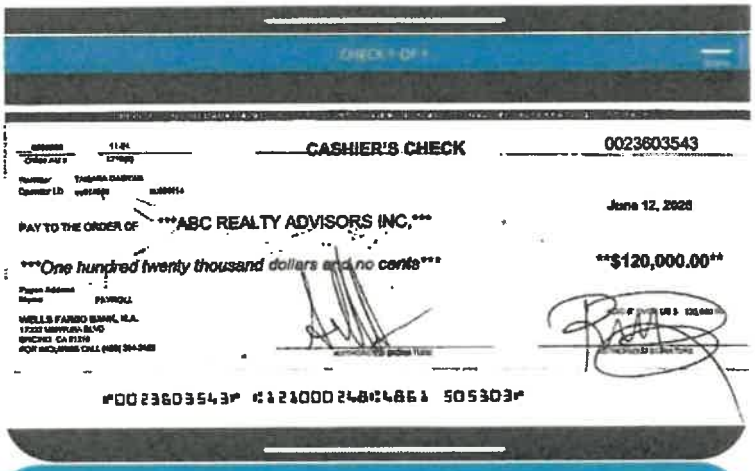
Drawer Comerica Bank

00060/89411 000500703

Authorized Signature

Securcline Realty

3:53 PM


CASHIER'S CHECK

0023603543

June 12, 2020

PAY TO THE ORDER OF ***ABC REALTY ADVISORS INC.***

One hundred twenty thousand dollars and no cents

$120,000.00

PAYROLL

WELLS FARGO BANK, N.A.

3:53 PM

And I have my proof of my wire that I send to Richard period

3:53 PM

Talking to Jennifer

3:57 PM

Babe i never took $120 k cash ever

3:58 PM

Those are my proof

3:58 PM

Fred

iMessage

What motion ? 10:21 PM

NOTICE OF MOTION AND MOTION FOR KASTIGAR HEARING
TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD: 10:22 PM

W 10:22 PM

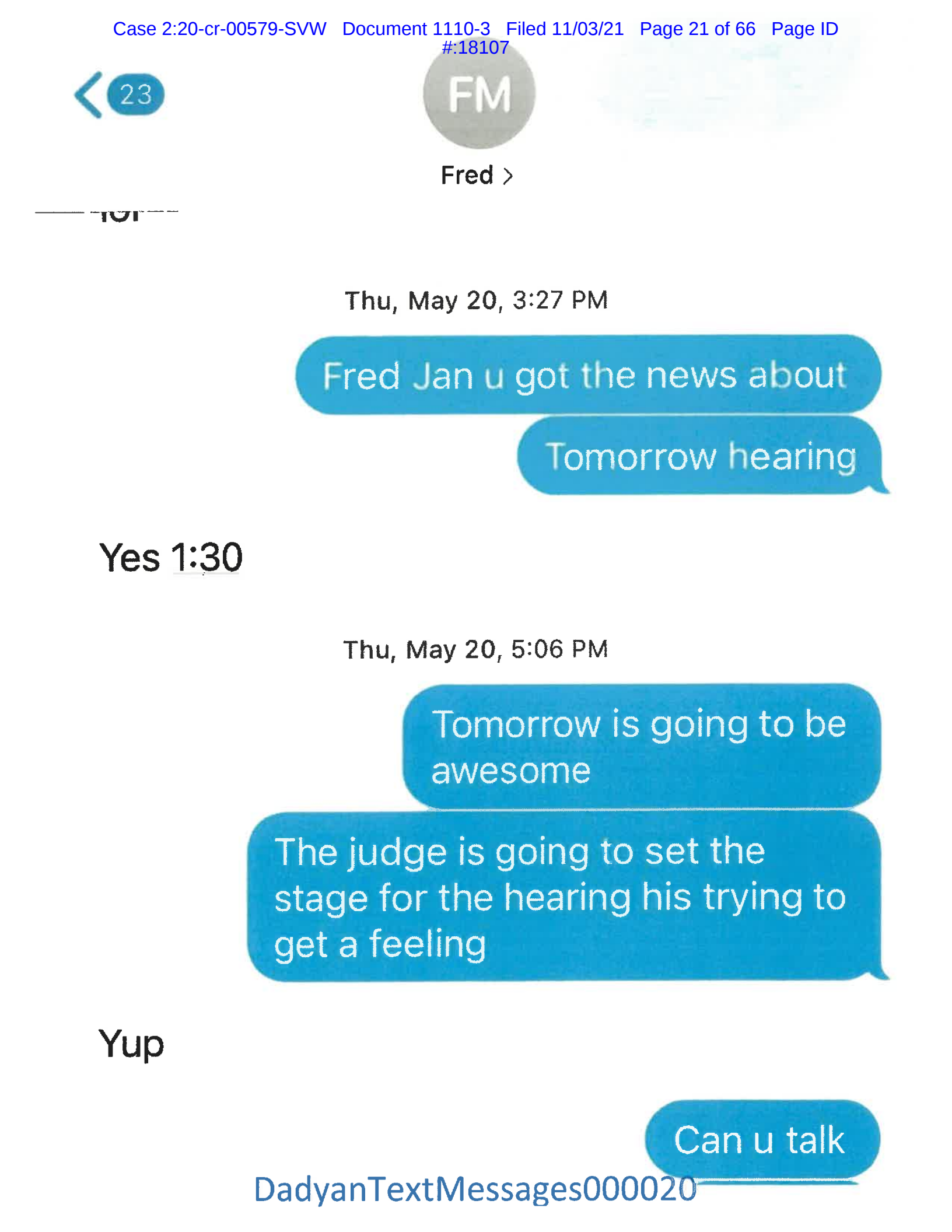
FILE_0885.docx

☝ 10:22 PM

They have tainted evidence and exactly what the wtf they did what they did in state 10:22 PM

Oh KASTIGAR is to out the government witnesses who they have given them immunity 10:23 PM

23
Fred
Prosecution based everything on the phones they have from richard and them and I think the conversation or something u said
The privileged information
Yup
Well Jerry told me that too on the states inditement their evidence is tainted
Because until they came inside here they never had shit and we never moved forward on the federal case and Arthur even told Tom maseauwr that there was stuff here belonging to the other guy
Ohh and Fenton called the other attorney right away the one representing the Edward guy yon Friday
So basically they have till tomorrow and Ashwin files it
Mon, May 17, 2:21 PM



Thu, May 20, 3:27 PM

Fred Jan u got the news about

Tomorrow hearing

Yes 1:30

Thu, May 20, 5:06 PM

Tomorrow is going to be awesome

The judge is going to set the stage for the hearing his trying to get a feeling

Yup

Can u talk

Fred >

Sat, May 22, 9:04 AM

Good morning call me

Sat, May 22, 2:41 PM

Call me please important

I tried calling u I know I saw the order from yesterday hearing and Ashwin is preparing a subpression motion for my phone records

I need you to reach out to AUSA and tell him the people who put their bond for me and Art want to sell their house so I have to switch with a different property I have no choice. They called Antonio and told him so I have to find a new house they r scared since Greg was included in the state case they want nothing to do with me. U know this people

Fred >

Tue, May 25, 2:32 PM

Hi can we meet tomorrow at 5:30
My meeting got moved to 3pm

Yes

Thank you 🙏

Tue, May 25, 3:44 PM

Babe tell her to file something like it was a mistake

The wife is asking for a subpression and

Husband is asking to come out dosent look good

Please babe

Did she answer ?

Waiting for her

Ok he texted her

She called and she's joining it

Fred

Wed, May 26, 3:29 PM

Come at 4:30

Ok perfect

Thx

Fri, Jun 4, 11:54 AM

Call me please

Mon, Jun 7, 9:57 AM

Tammy jan good morning
Time is running out
We need to approach the government again.

Sat, Jun 19, 3:15 PM

Hi call me please

Sat, Jun 19, 4:37 PM

Im getting my nails done I'll call u after

Ok 👍

Fred >

Tue, Jun 1, 2:48 PM

Call Ashwin please he filed a 7 motions

Ok

Befor the 6/4 so his on it so ask him if we need to file a Extention request

Also

Ok

By the B way don't B forget Edo and Vahe will be getting new attorneys to come on board

He is saying we are going to trial.
If kastigar not granted

we're not going to trial

We just don't want to bring in new Attorneys to replace Vahe's Attorney or Edos Freedom just yet

Tammy this is no joke I am very worried about the outcome.
Trial is going to end very bad for

Fred >

I might withdraw from the motion so that I can negotiate with the government.
What if the trial date is not continued.

We're not going to Trial

We're not included in the motions It's them and if freedman gets replaced then that's definitely going to get 6 months Extention and Vahe's att

No the motion regarding your phones and text.
Please read the motion that I just emailed to you

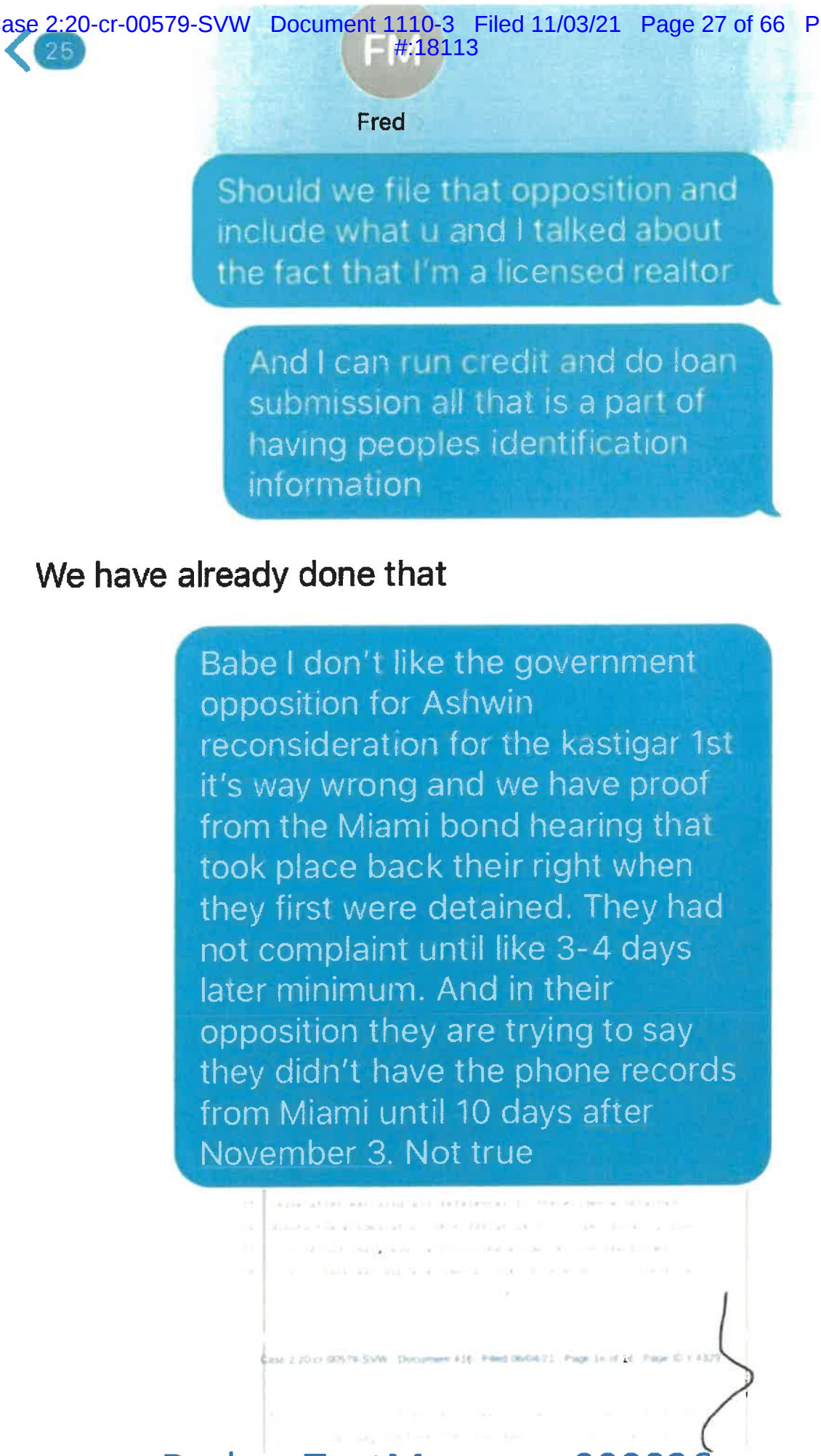
I did get it yesterday

Fred I'm not pleading to nothing and we're jot going to trial

Ok

Wed, Jun 2, 3:07 PM

Tammy I am on conference call



We have already done that

Fred >

Cir. 2001), this does not extend to fundamental changes in the crime charged. Such changes may only be made by the grand jury. *Stirone*, 361 U.S. at 217.

In *United States v. Miller*, 471 U.S. 130 (1985), the U.S. Supreme Court held that the government could meet its burden of proof on a narrower conspiracy than the one originally charged without returning to the grand jury first, so long as the narrower conspiracy was "completely contained" within the charged conspiracy. *Id.* at 144. But here, the conspiracy the government now intends to prove at trial is not clearly contained with the conspiracy actually charged in the Superseding Indictment. *Miller* turned on changes to the indictment before trial that were "in no way essential to the offense." *Id.* at 145. Here, the government chose to bring a Superseding Indictment that, in the government's own words, "substantially expanded the scope of the charged conspiracy." The grand jury charged the defendants with this new conspiracy that contained 151 loans submitted by 79 different companies and 56 different people. According to the government, Ayvazyan or Tamara Dadyan[1] - was the mastermind of this vast web that included dozens of people and companies and the coordination of eight separate defendants, a far cry from conspiracy of four family members alleged in the original indictment. The government took on the burden of proving this new conspiracy, but now seeks to revert to a smaller, simpler conspiracy after the defense previewed that it will challenge the government's ability to prove that a single conspiracy existed. That is a material change that must be brought before a grand jury.

A similar issue was presented in *United States v. Rakow*, No. CR 04-01563, 2006 WL 8445940 (C.D. Cal. June 30, 2006) (Morrow, J.). One week before trial in that case, the government attempted to narrow the indictment by redacting certain allegations regarding the scope of the scheme that had been charged by the grand jury. *Id.* at *1. The defense had prepared to defend against the scheme charged in the indictment, and objected to the government's eleventh hour attempt to fundamentally

[1] *See* Dkt. 384 at 1 (describing Dadyan's home as "the headquarters of a massive criminal conspiracy")

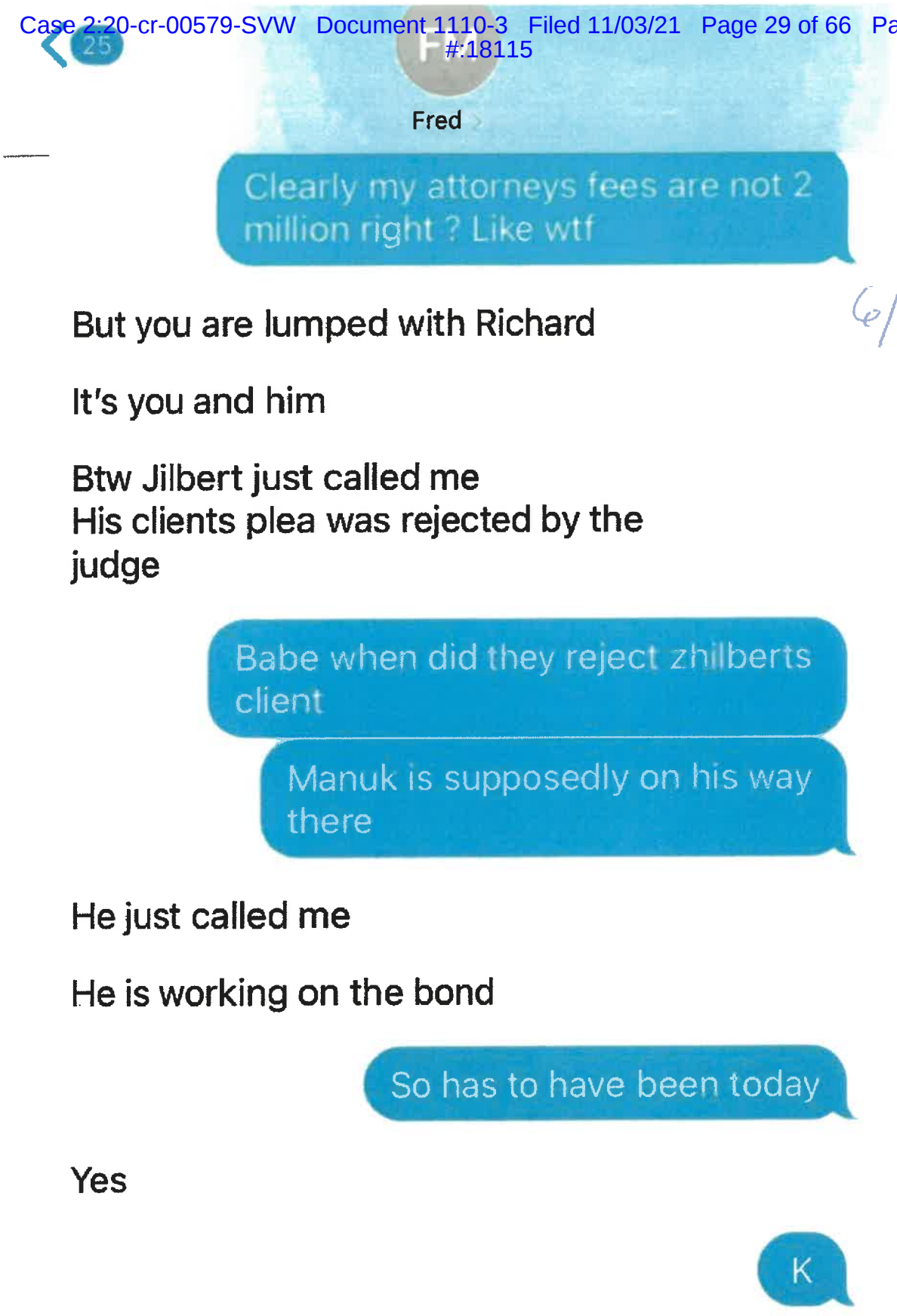
How the fuck they think I'm the master mind

I don't get it What conspiracy is left the 17 of them can u look into that based on their new motion

They are 150 loans 35 loans ?

I only got loans on my business I don't sell their houses or did their loans none of this shit

DadyanTextMessages000027


25
Fred
Clearly my attorneys fees are not 2 million right ? Like wtf
But you are lumped with Richard
6/4
It's you and him
Btw Jilbert just called me
His clients plea was rejected by the judge
Babe when did they reject zhilberts client
Manuk is supposedly on his way there
He just called me
He is working on the bond
So has to have been today
Yes
K

Fred >

6/8

Please prepare the motion to continue please

This is aml N bullshit this talking his doing we're wasting time

I will do it tomorrow and file it

Fred Art is saying Jennifer wants u to call her

Inwill

I will

So you guys can prepare it

Ok

How about vahe att

He is on board

Did u talk to him

Yes

Ok good I'm done with this I'm going to have. Heart attack

Fred

He just texted me that he will join

Me too !

If the client says they r not ready to go to trial the judge can't go forward

Wilson will!

Still talking on the phone ?

This fuckers not even answering my text now

Yes

I told him tell ur att

To take a rabbit out of his ads

Almost done

Tell them please they need

To listen tell them Tammy is crazy I

Will not show up I call jusdges chamber lol

Fred >

6/8

Fuck the JDA lol we need to do the B motion to continue

And don't listen Aswin were done

With their band wagon

Amen 🙏
I agree

We should have done that last month

Well it's not too late we will be good trust me babe

God will take care of us u know that

🙏🙏

Fred

U there

It's urgent

Fred >

Yes on the call

Call me

With who

Tell Aswin to do what ever he needs to do I'm not going to trial

Please Tell Richard
According to Ashwin Richard is family.

Ashwin doesn't listen to me

I just did but we need to file a motion to formally request it

I don't care about his Fucking car salesman pitchy

Pitch

Is he still talking

Please prepare the motion to continue please

This is aml N bullshit this talking his doing we're wasting time

Fred >

This fucker he can't trow it all on us last minute

Jen is not picking up

R u talking to Jennifer

I feel like this mother fuckers

No she didn't pick up

Are pressuring Art

I told him to get the fuck out of there already

Fred sorry but only ask for continuance because we're not ready we were in jail that's it I haven't seen discovery or interviewed any witnesses. D[redacted]

[redacted]

[redacted]

Fred

I agree ☝

I love u I'm sorry Fred I hate to bug u and get on your nerves I'm Sorry

Judge wilson has no idea about the state case ever took place b that we were in jail for 3 weeks

Why Isn't Ashwin even mentioning that

I don't know

Tom is saying no to the continuance Art has to instruct them to file it with us tomorrow

Fuck him

U watch me

Wtf ??

I'm not getting 10-20 years

His almost home he will have Tom join it

Tom dosent want to look bd I front

Fred

On the phone with Fenton

Call me urgent

U want me to put the ones for Art too?

Yes

U need the state indictment too or only federal

Only fed

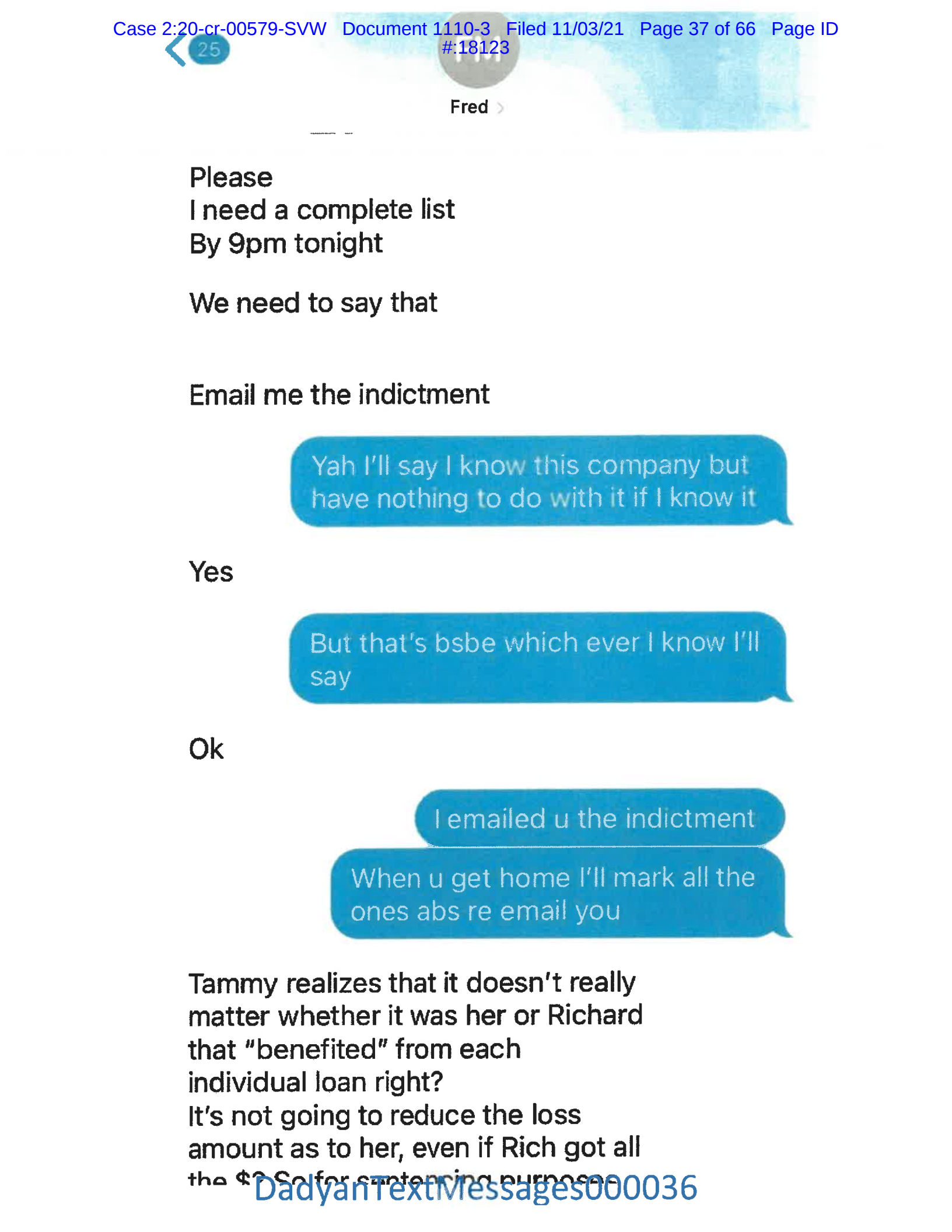
Tammy on the text messages you are admitting to more than 3 loans You have to give me the entire scoop

That dosent mean it's there on it and I never ever ever ever received nothing

I don't know the companies that are on the indictment

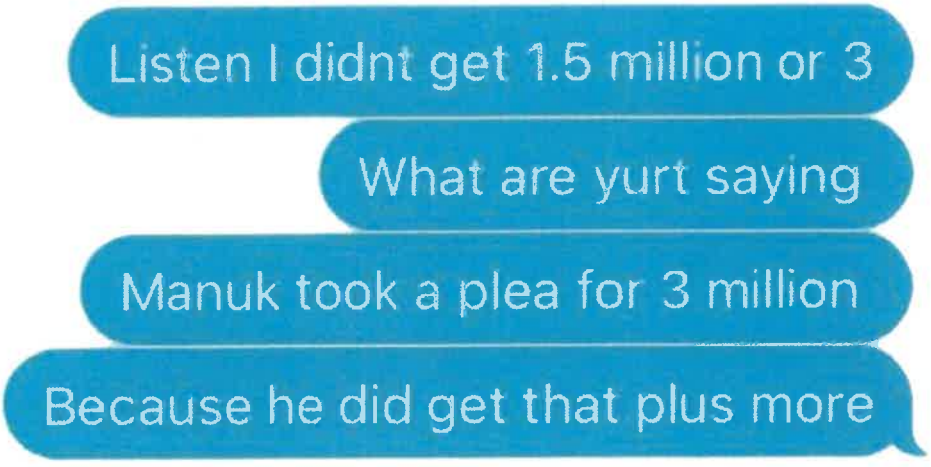
I will mark every one I know about

But like what tutu want me to do sag


25
Fred
Please
I need a complete list
By 9pm tonight
We need to say that
Email me the indictment
Yah I'll say I know this company but have nothing to do with it if I know it
Yes
But that's bsbe which ever I know I'll say
Ok
I emailed u the indictment
When u get home I'll mark all the ones abs re email you
Tammy realizes that it doesn't really matter whether it was her or Richard that "benefited" from each individual loan right?
It's not going to reduce the loss amount as to her, even if Rich got all

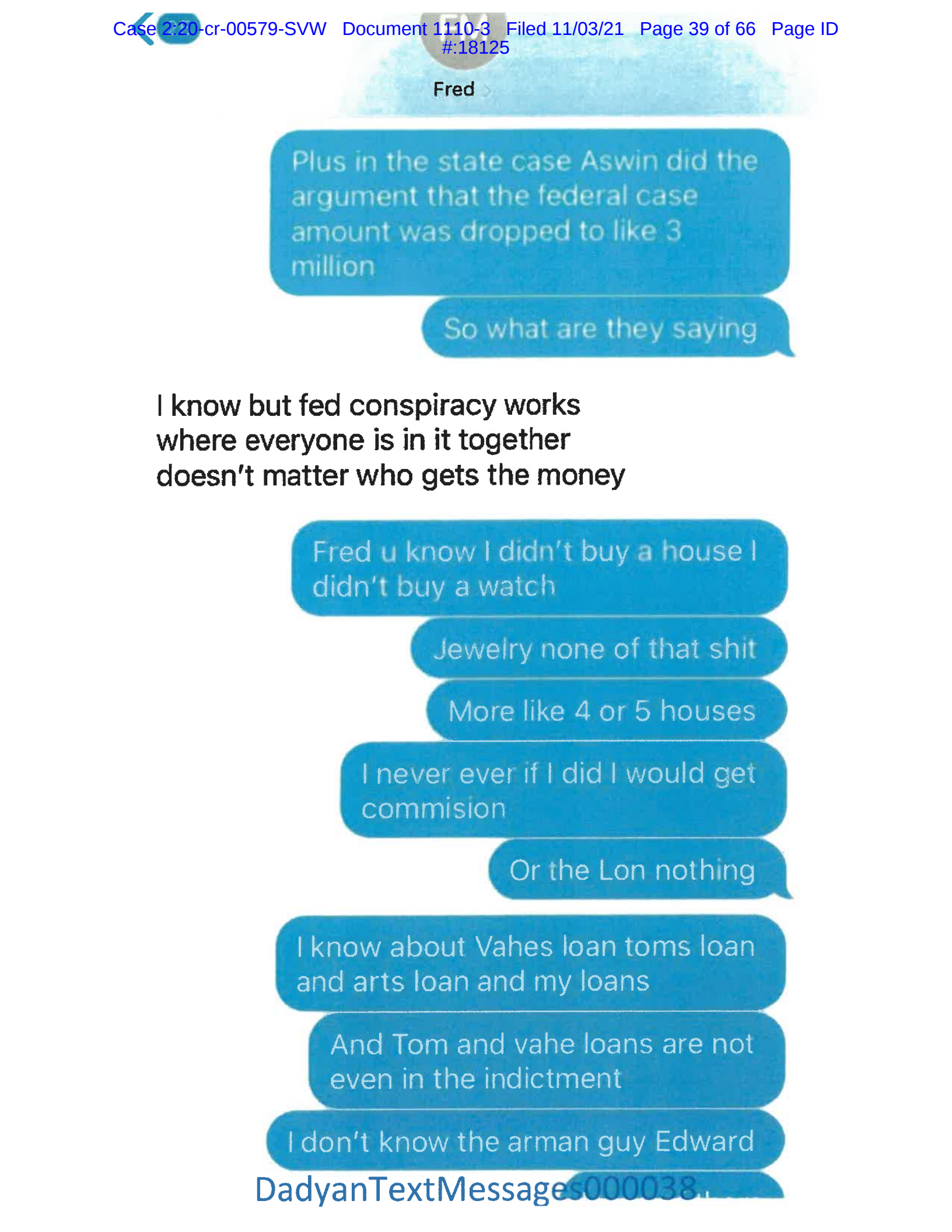


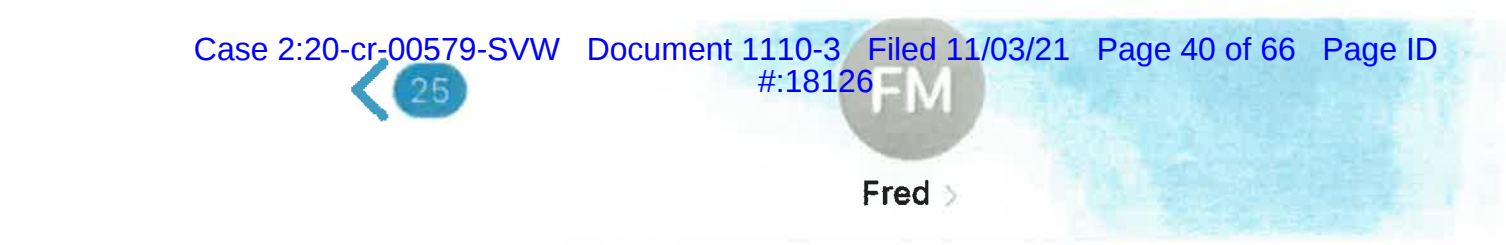
Tammy realizes that it doesn't really matter whether it was her or Richard that "benefited" from each individual loan right?
It's not going to reduce the loss amount as to her, even if Rich got all the $? So for sentencing purposes it's isn't an issue. As long as the loss amount in the plea is less than 3.5M it's the same points wise as if it was 1.5M. If most of the profit went to him, that's an argument for downward variance at sentencing so as to avoid sentencing disparity.



It's from my contact




Fred
Plus in the state case Aswin did the argument that the federal case amount was dropped to like 3 million
So what are they saying
I know but fed conspiracy works where everyone is in it together doesn't matter who gets the money
Fred u know I didn't buy a house I didn't buy a watch
Jewelry none of that shit
More like 4 or 5 houses
I never ever if I did I would get commision
Or the Lon nothing
I know about Vahes loan toms loan and arts loan and my loans
And Tom and vahe loans are not even in the indictment
I don't know the arman guy Edward



Ok identify the loans like I asked you to do please
We are running out of Tome

I'm almost home I'm driving back by

6/10

Thursday 7:51 PM

See if you got it I just emailed you

Is it all the loans

Yes Jennifer texted Art saying that's what she's waiting for too ?

93 k Art send and 200 or 202 I send to richard

And Art told him about Tom gave him $73,500 from his loan for the joint venture they had to build on a land but he died

What's the update ?

I'm working on it

Ok thank you

Fred >

If they bring one more thing out about me being ring leader remind them that hayrapetyan gave detailed information on camera and in writing that Manuk send him to go open the accounts. And he said he dosent know any of us. Me art vahe.

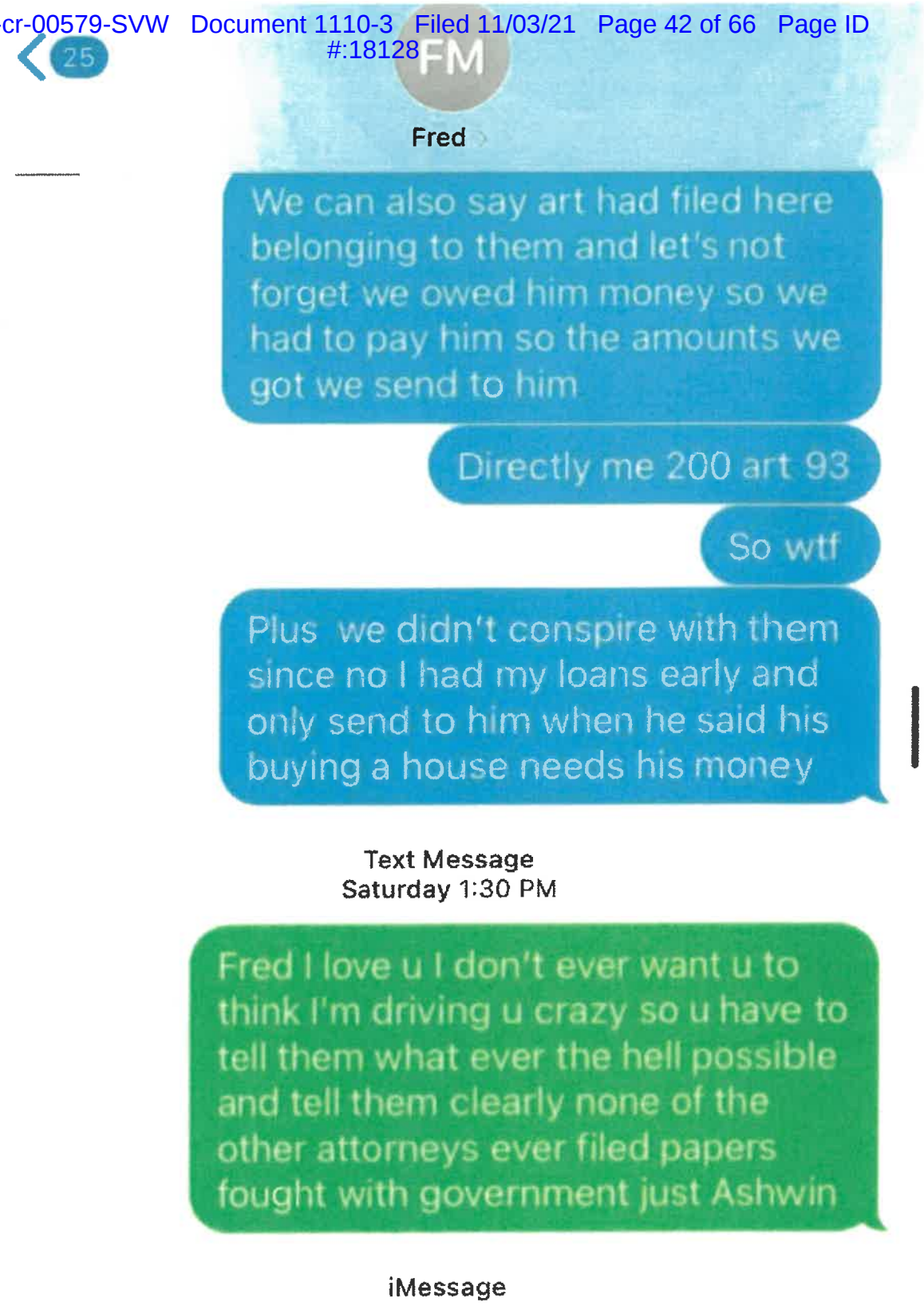
I do t want to be a punk but it was Rich's shit in my house also so not fair me and art have to fucked because we don't have loads of cash

Then let's say it !
To help yourself
We are in this shit because of
Richard

Well that's the truth I just don't want to be a bitch u know me

So we have to say it in a way so it dosent look like we're saying like being a punk

We can also say art had filed here belonging to them and let's not forget we owed him money so we had to pay him so the amounts we



Yes and pissed them off
And got us to this point !
To a point that they gave the info to the state to file a case.

Saturday 4:31 PM

Fred >

Saturday 4:31 PM

See what they are saying to Jennifer with Art this was by far the worst in the world they have to be kidding me they gave offer to richard 8 years 2nd time offender

And his wife 3 years

So they can kiss my ass

They can't give a offer to Richard for 8 2nd time and me like this

Are You talking to Ashwin ??

Yes

Saturday 5:55 PM

Fred's permission so I can discuss those with you too. Please stand by Will call soon.

Jennifer is there a way Tom can negotiate for me and tammy

There is no more negotiation. The AUSA's supervisor has only approved this. The supervisor (who I know about) will not be approving any other offers. I already tried.

What's my offer ?

Let me please get all the numbers



So why is she telling art that she's talking to the supervisor and the negotiating is closed?

21.9 million for me and for art this is bull crap

Yes she is so are we still going to negotiate a better deal.

No she's saying the supervisor is not negotiating and she's still talking about the big a

I am working on that

Like literally I don't even understand what the hell she's talking about

Tammy is known for understanding sentencing guidelines!
Is she on the phone with Art

Yes ca she's still talking

I am talking to them
Right now



Manuk is on servailence

He is the one who bought the house

Richard ,
You
Arthur amd
Mary
Are looked at differently

What if we say that didn't be belong to us it belonged to them

I mean what the B hell

Then you become a cooperator
against your family

She's still talking here going up loss coming up all this bull crap

Sadly it's not
Tammy jan you and Arthur will be
convicted at trial
And the numbers are double
I love u please don't make a mistake

Fred >

You taking to your contact can't they talk to

To this Ronnie

Person

Apearantly

On it !!!!

About to finish
Can I call you

Because of this Jennifer is saying it's like 7 plus 2?

This is seriously insane

But we can argue down

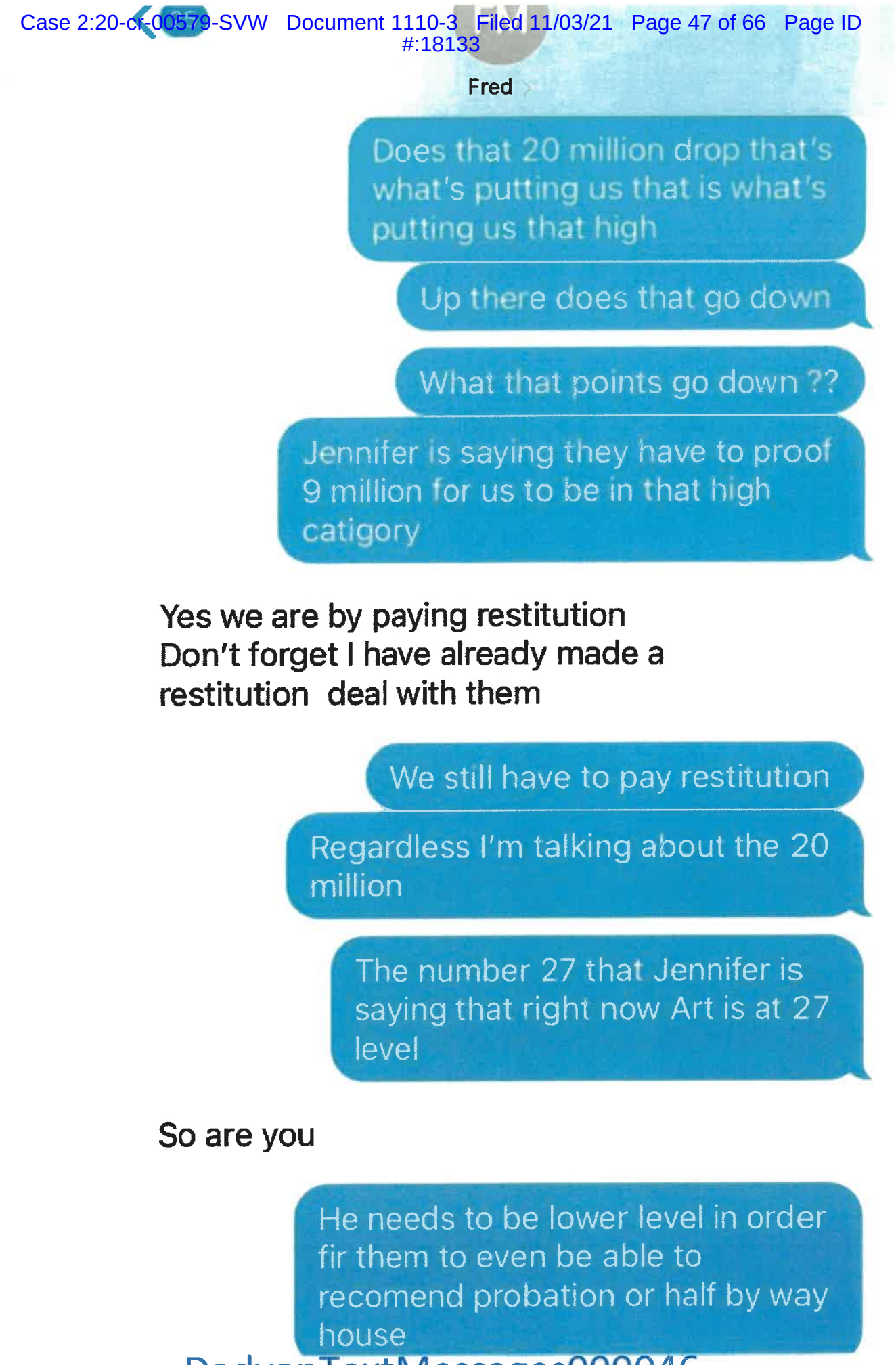
What happens if I cooperate

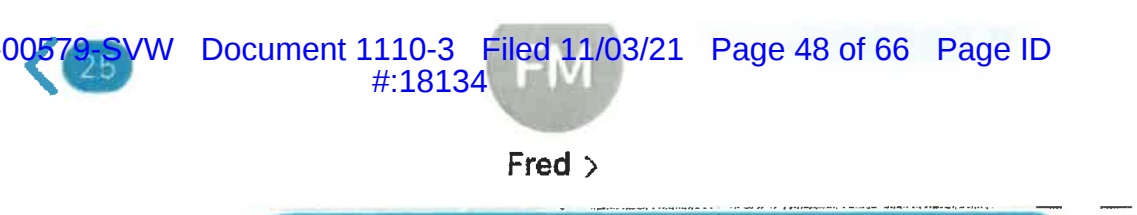
But don't want to go to

Trial abs testify

I need to know that too that the stuff from my house was the wire

There's


Fred
Does that 20 million drop that's what's putting us that is what's putting us that high
Up there does that go down
What that points go down ??
Jennifer is saying they have to proof 9 million for us to be in that high catigory
Yes we are by paying restitution
Don't forget I have already made a restitution deal with them
We still have to pay restitution
Regardless I'm talking about the 20 million
The number 27 that Jennifer is saying that right now Art is at 27 level
So are you
He needs to be lower level in order fir them to even be able to recomend probation or half by way house



Jennifer is going to join u to the call I think that he might have a point

And it might work for us all as negotiating tactic I don't know

Jen and Tom are not interested

I am going to have the government draft the plea
And let's see it in writing

R u guys talking?

With him

I am talking to Tom and Jennifer

What about Ashwin

No Ashwin

They don't want to talk to him

They told Art have him call my cell Jennifer

And she said I'll add Fred

I don't know

Fred

I don't know
My head s spinning g

I and available

Did h talk

U talk

She just called Art

Speaking to the government

But for ashiwn

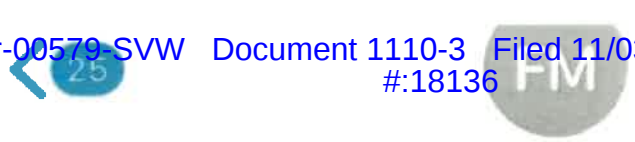
He talked to Jennifer

Re open plea for Art

Why can't I do a open plea

Because you would get killed !
Count 33 is a 3 level upward departure
Wilson will kill you please listen to me I have your best intersects

Interest



Fred >

I'll call u back my mom is next to me

11 am my office
Meeting Tom and Jennifer
Come with Arthur

Tomorrow

How come Jennifer didn't give Art that open plea option to begin with talking about 9 years?

We can't plead open its not in his best interest
We will talk about it tomorrow

Sunday 9:41 AM

Tammy jan moving meeting back
Waiting on the pleas

Will keep you posted

Why can't I do a open plea

I will take responsibility for my own actions and loans

There is absolutely no way I'm going to agree to their bullshit that him Manuk and hayrapetyan did no way



Tammy jan
Because they will still go to trial on the other counts including count 33
Ashwin is not your lawyer
To plead open means
You have to enter a guilty plea to all all counts wow on will not accept any other way.

Then we are going to trial on Tuesday and you are risking 20 plus years

So it's ok fir them to want to give me all that crap ? Well let's see what their new B offer is

It's a not but Richard has brought us to this point.
Tammy jan the evidence from your phone is so bad.
Please understand this will give us a chance to argue to the judge that you accepted responsibility.
Rather going to trial and losing.
And we are going to lose. It's crazy we are going to trial knowing that we are going to lose. That's crazy

Fred >

So how come Jennifer told Art he has to plea guilty to bank & wire fraud only
That's the open plea ?

No it's not
It's the same counts as you
Count 1
Court 24
Count 26
Identical counts
They will dismiss the rest
Specially count 33 for you that can add an additional 3 years

None of you are pleading open
Pleading open means you have to say guilty to every single count !!!!!
You cannot do that

Ok lav we'll go over it there at 1pm because this is all co fusing and that's what Arts being told his going to plead on bank fraud and wire fraud

Ok
Yes so are you
The deal for art is identical to yours



Yes for exactly what he did
Don't know his level
Reached out to the lawyer

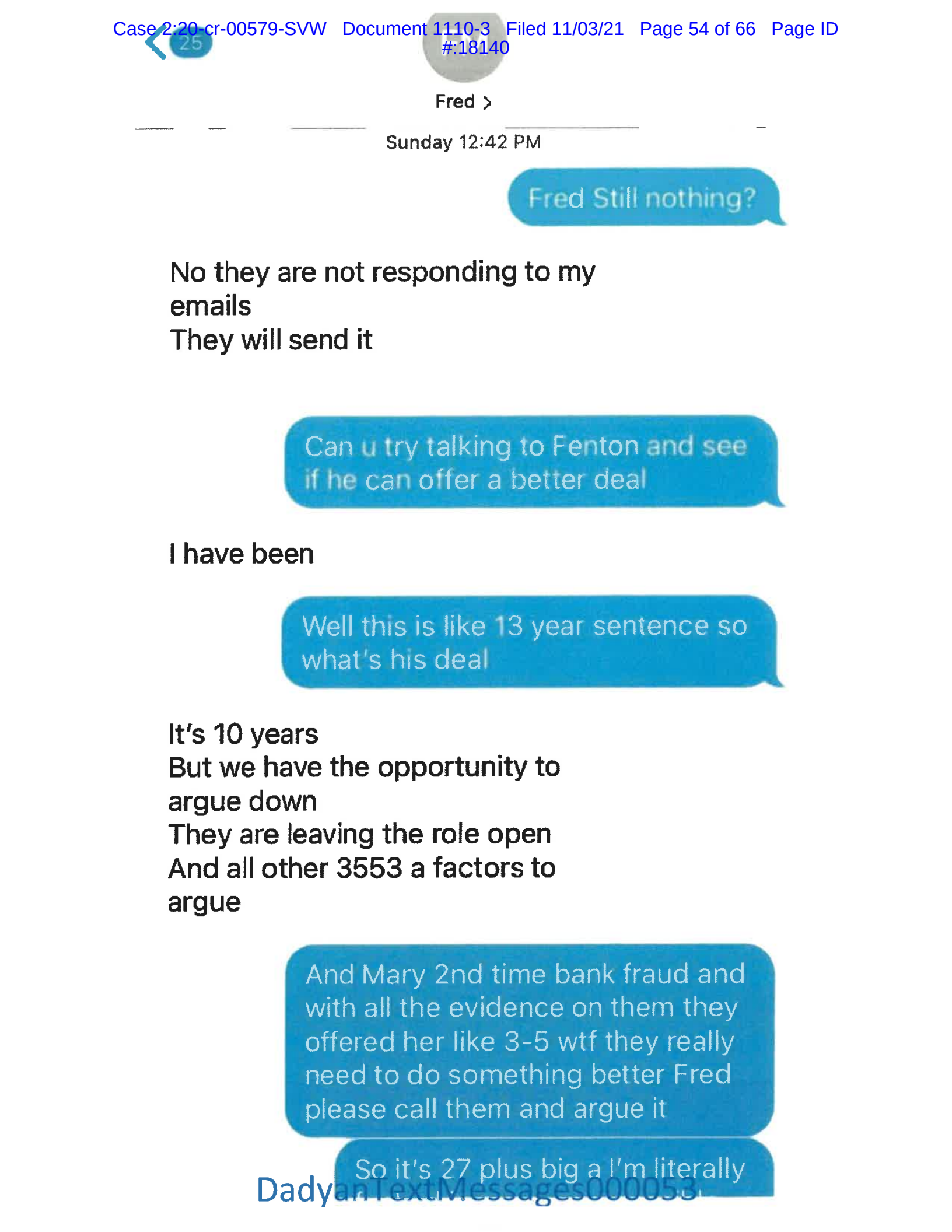
Everyone is getting the fuck out

Apparently are they sending you a new deAl for me or the same one from yesterday

Same deal but in writing so we can make sure all ave are open to argue to the judge for a lesser sentence. For example they have agreed to leave the role enhancement open so we can argue that you didn't benefit Gave the money to Richard
etc.....
And most importantly that count 33 is dismissed

Hey Fred, still no plea documents. I propose we simply wait until
The pleas arrive and then agree to meet at your office 1.5 hours after that. So we aren't constantly changing things. Sound OK?

From Jennifer


25
Fred >
Sunday 12:42 PM
Fred Still nothing?
No they are not responding to my emails
They will send it
Can u try talking to Fenton and see if he can offer a better deal
I have been
Well this is like 13 year sentence so what's his deal
It's 10 years
But we have the opportunity to argue down
They are leaving the role open
And all other 3553 a factors to argue
And Mary 2nd time bank fraud and with all the evidence on them they offered her like 3-5 wtf they really need to do something better Fred please call them and argue it
So it's 27 plus big a I'm literally

Fred >

Tammy jan you go to trial you will lose your life
This way we have a chance for a lower sentence

They need to understand that's and I didn't do the loans

We will argue that

Why can't u negotiate a better deal for men

Me

I am working on it

Because we have no leverage
Richard has left us no time
By pushing this fucking trial

Well let him go they want him so let go to trial but 10 years is a crazy like this is beyond horrible Fred

Tammy jan what more can I do
You have no defense
Trial equals 20 years with all the counts

Fred >

Does pleading negotiating agreements must be signed befor they start trial ?? Or as long as they know ur willing to plead they can work out the terms of the plea

Before trial

That's why we have been working all weekend

Well they clearly haven't send nothing so y been working but not them, if u say ur not going to trial ur pleading?? They can force y to truslz

Trial ?

No they are working
Spoke to Fenton we will have it today

Sunday 5:43 PM

In felony cases where plea bargains are permitted, the prosecution and defense can arrive at an agreement at any stage of the criminal proceedings, including during or after a trial but before a jury arrives at a verdict.

If there is a hung jury or one where a jury is

Fred >

resolve the matter in lieu of retrying the case.

What are some alternatives that may be negotatied in a plea bargain to avoid going to jail?

Alternatives to jail or prison can include

Fred is this something that can be negotiated? ☝ look it says anytime befor a verdict is reached and isn't there a statue? If defendant does not Want to go to trial how can they not negotiate-with us? I mean literally they still haven't send anything

They are negating with us we have until Tuesday Morning
I literally mad them another pitch on your behalf

Well like they need to come Back with something more reasonable this is on another level

Fred >

I get that but they don't see me not going to buy a house in Palm Springs Glendale Tarzana Woodland Hills

And that's Manuk and him and hayrapetyan

Abs somehow I'm getting the biggest end of the stick

Yes Richards is going to trial
His plea would be higher than yours

Well his not pleading his going to trial hoping to win kastigar

Not winning
Going to jail for a very long time

So what's the new pitch u made them

To cut the loss to to the next level
3.5-9.5 brings you down 2kevels
And to not include count 26
Which brings you down additional 2 level

So what's that bring it down to

Fred

Level 23
46-57 months plus the 2years.

5.5 years

The 2 years gonna stilll stay ?

Working on that as well
Have literally made 50 calls on that

Arts gonna tell Jennifer abs no Tom no that's no his text messages from That phone

Verizon is under his name

Ok

So what ever the guy offered for vahe didn't get excepted I told them to send us a copy of their offer so we see if they have that room to go back and argue

Jeniffer is saying you just received mine ?

I am still going thru it will call you after I am done

Fred

Alternative go to trial and get much more

The government rejected the plea

The government has said no

Ok please let me finish will call you back

What's it's saying still 10 Years ??

Almost done ✓

I just sent it to you call me

So what is this

Count 24 and 26

Talking to Fenton will call you back

I will explain

I never have any association with any of this fucking properties they want me to
Take this fucking hit of 12 Million ?



Talking to Fenton !

Will call you back

87 months plus 2 years I mind as well go Fucking kill myself

And finish it

This is a trap

And no Apeal ?

It's not a trap
Stop !
We are starting trial Tuesday
Just on count 33 you can get an additional 3 years consecutive

Like no room to argue

Yes there is
Call me just finished with Fenton

Babe it's a law we'll get a Extention

And we don't have to take this plea deal

Babe I'm serious

Fred >

Tammy jan I don't know
You guys can't plead open !
The 4 of you are looked at
differently

Can't we email Fenton tomorrow when I'm there can't u call that looser tell him to go lighter on the ca loss this that ??

Just emailed him
Waiting

Yah tell him she will be in my office this is not fair I didn't buy the houses and maybe even see what other options we have

Tomorrow morning 8am sharp
Bring the agreement with you

What if he changes it

Still 8 am
We have a 10:30 deadline

Yes we see that but don't give Fred do send him another communication please for me this can't work u know

8:27

All Inboxes **2 Messages**

FM **Fred Menasian** 6/13/21
To: TAMMY DADYAN >

Re: Plea offer for Tamara Dadyan

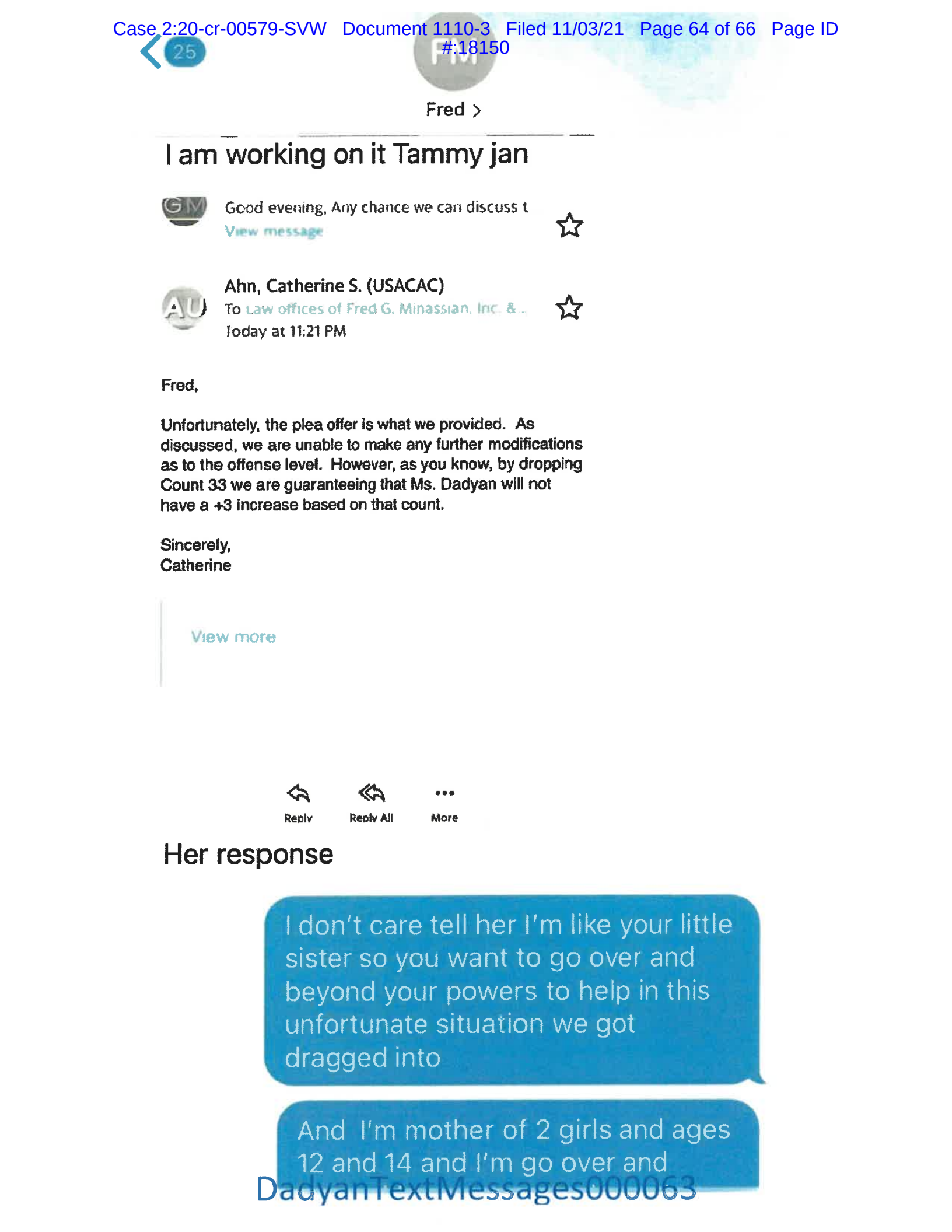
Catherine,
Good evening can you please call me need to discuss a possible amendment to agreement.
Best,
Fred

Sent from Yahoo Mail for iPhone

> On Sunday, June 13, 2021, 8:07 PM, Law offices of Fred G. Minassian, Inc. <fgminassianlaw@yahoo.com> wrote:

Sent from Yahoo Mail for iPhone

Emailed 6/13/21 at 8:07 pm Plea offer for Tam...


25
Fred >
I am working on it Tammy jan
GM
Good evening, Any chance we can discuss t
View message
AU
Ahn, Catherine S. (USACAC)
To Law offices of Fred G. Minassian, Inc. &...
Today at 11:21 PM
Fred,
Unfortunately, the plea offer is what we provided. As discussed, we are unable to make any further modifications as to the offense level. However, as you know, by dropping Count 33 we are guaranteeing that Ms. Dadyan will not have a +3 increase based on that count.
Sincerely,
Catherine
View more
Reply
Reply All
More
Her response
I don't care tell her I'm like your little sister so you want to go over and beyond your powers to help in this unfortunate situation we got dragged into
And I'm mother of 2 girls and ages 12 and 14 and I'm go over and

Fred >

On it

Monday 8:15 AM

Fred make sure the plea dosent say I agree not to Apeal it

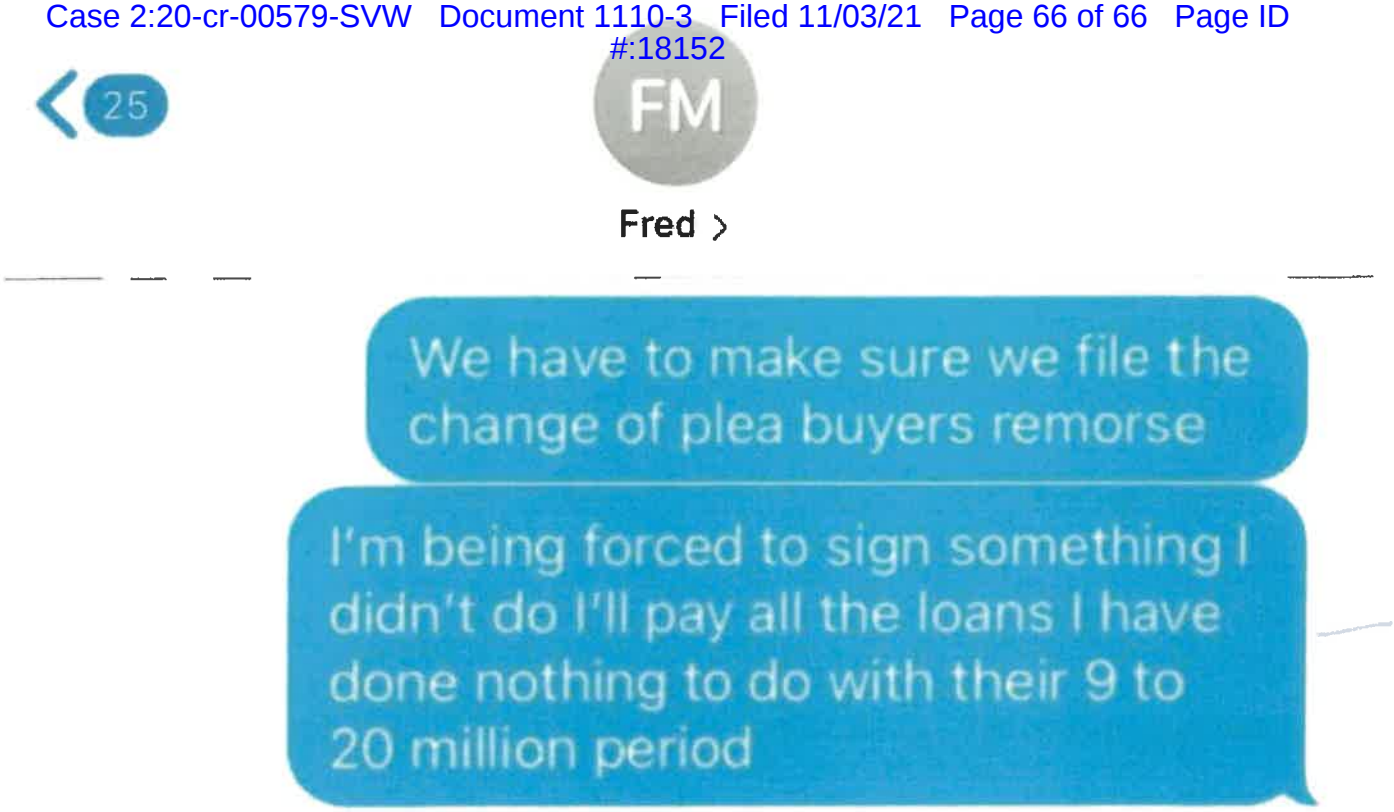
And contest

I am at the office
Where are you ?

Going in elevator

Tamara Dadyan Plea Agre...

Monday 9:55 AM



Sentencing

Tammy jan
We need to go over The factual basis
If Wilson says no then we are going to trial

Stop !
Please focus on what's going on and think of Tammy for once !

We can't allow this deal to fall apart
If it does you are risking 20 years of your life