

1 TRACY L. WILKISON
 Acting United States Attorney
 2 SCOTT M. GARRINGER
 Assistant United States Attorney
 3 Chief, Criminal Division
 SCOTT PAETTY (Cal. Bar No. 274719)
 4 CATHERINE AHN (Cal. Bar No. 248286)
 BRIAN FAERSTEIN (Cal. Bar No. 274850)
 5 Assistant United States Attorneys
 Major Frauds/Environmental and Community Safety Crimes Sections
 6 1100/1300 United States Courthouse
 312 North Spring Street
 7 Los Angeles, California 90012
 Telephone: (213) 894-6527/2424/3819
 8 Facsimile: (213) 894-6269/0141
 E-mail: Scott.Paetty@usdoj.gov
 9 Catherine.S.Ahn@usdoj.gov
 Brian.Faerstein@usdoj.gov

10 JOSEPH S. BEEMSTERBOER
 Acting Chief, Fraud Section
 Criminal Division, U.S. Department of Justice
 11 CHRISTOPHER FENTON
 Trial Attorney, Fraud Section
 12 Criminal Division, U.S. Department of Justice
 1400 New York Avenue NW, 3rd Floor
 14 Washington, DC 20530
 Telephone: (202) 320-0539
 15 Facsimile: (202) 514-0152
 E-mail: Christopher.Fenton@usdoj.gov

16 Attorneys for Plaintiff
 17 UNITED STATES OF AMERICA

18 UNITED STATES DISTRICT COURT

19 FOR THE CENTRAL DISTRICT OF CALIFORNIA

20 UNITED STATES OF AMERICA,
 21 Plaintiff,
 22 v.
 23 TAMARA DADYAN,
 24 Defendant.

No. 2:20-cr-579(A)-SVW-4

GOVERNMENT'S RESPONSE TO
 PRESENTENCE INVESTIGATION
 REPORT FOR TAMARA DADYAN

Sentencing: October 25, 2021
 Time: 11:00 a.m.
 Location: Courtroom of the
 Hon. Stephen V. Wilson

27
 28

1 Plaintiff United States of America, by and through its counsel
2 of record, the Acting United States Attorney for the Central District
3 of California, Assistant United States Attorneys Scott Paetty,
4 Catherine Ahn, and Brian Faerstein, and Department of Justice Trial
5 Attorney Christopher Fenton, hereby files its initial response,
6 pursuant to Federal Rule of Criminal Procedure 32(f), to the
7 Presentence Investigation Report ("PSR"), prepared by the United
8 States Probation and Pretrial Services Office ("Probation"), for
9 defendant TAMARA DADYAN ("defendant") (ECF 959).

10 The government respectfully submits that the PSR should be
11 amended to include the following two enhancements necessary to
12 reflect the scope of defendant's crimes and conduct for which she was
13 convicted, including: (1) a three-level aggravating role adjustment
14 based on the fact that she was a supervisor/organizer of otherwise
15 extensive criminal activity in accordance with U.S.S.G. § 3B1.1(b);
16 (2) a two-level enhancement because the offenses involved the
17 possession of 5 or more means of identification that unlawfully were
18 produced from, or obtained by the use of, another means of
19 identification in accordance with U.S.S.G. § 2B1.1(b)(11)(C)(i) and
20 (ii); and (3) a two-level victim-related adjustment based on the fact
21 that many of her victims were vulnerable and could not protect
22 against her use of their name in accordance with U.S.S.G.
23 § 3A1.1(b)(1). If included, these enhancements result in a seven-
24 level increase in defendant's Guidelines calculation from 31 to 38,
25 resulting in an overall Guidelines range of 235 to 293 months'
26 imprisonment. The government concurs with the PSR's determination of
27 defendant's Criminal History Category.

28

1 **The PSR Should Apply a Three-Level Aggravating Role Enhancement**
2 **Because Defendant was a Supervisor/Organizer**

3 Defendant, along with co-defendant Richard Ayvazyan, directed,
4 managed, and supervised the extensive criminal activity involved in
5 (1) developing the identification and supporting documents necessary
6 to submit the fraudulent Paycheck Protection Program ("PPP") and
7 Economic Injury Disaster Loan ("EIDL") applications; (2) obtaining
8 and directing the resulting fraudulent proceeds through additional
9 accounts to purchase assets and distribute the proceeds to co-
10 conspirators; and (3) handling individuals recruited into the
11 conspiracy.

12 Defendant's close involvement in developing the identification
13 and supporting documents necessary to submit fraudulent PPP and EIDL
14 applications is extensively shown through the evidence seized from
15 her phone, her husband and co-defendant Artur Ayvazyan's phone, the
16 evidence seized from her and Artur Ayvazyan's home (the "Weddington
17 residence"), and through the text messages exchanged between herself
18 and co-defendant and brother-in-law Richard Ayvazyan, among other
19 things.

20 First, the evidence seized from the Weddington residence,
21 combined with the evidence on her and her husband Artur Ayvazyan's
22 phone, shows defendant's role in helping to identify and develop the
23 synthetic identities to use in the PPP and EIDL fraud.

24 For example, the evidence the government seized from the
25 Weddington residence shows how defendant targeted foreign exchange
26 students and visitors in order to steal their names for use in the
27 fraud. Customs and Border Patrol ("CBP") records showed that
28 defendant and her co-conspirators stole and used the names and

1 identities of foreign students and visitors who had traveled to and
2 left the United States years before COVID-19. (See e.g., GEX 57.c,
3 GEX 116 (charts summarizing, among other things, PPP and EIDL
4 applications submitted in the names of Iuliia Zhadko, Viktoria
5 Kauichko, and Anton Kudiumov) and GEX 44.) The government found
6 copies of numerous visas, including J-1 (student) visas (GEX 57.c at
7 1, 3, and 5-8), matching social security work authorizations, and
8 passports in the names of individuals other than defendants,
9 including the name of Anastasiya Rysik (GEX 57.c at 8-10), at the
10 Weddington residence. The government also found the front and back
11 of purported California Driver's Licenses ("CADLs") and social
12 security cards in names matching the stolen J-1 foreign exchange
13 student identities. This included count 24's identity theft victim
14 Anna Dzukaeva (GEX 57.a at 1-2), and three copies of a CADL bearing
15 the name Liudmyla Kopytova with two different photos, as well as a
16 purported social security card bearing her name (id. at 1-2, 7-10).
17 Papers with images of identification documents and handwritten notes
18 regarding modification and use of personal identifiers, addresses,
19 emails, and passwords (GEX 57.b at 3 and 5-7), as well as photographs
20 of faces used in fraudulent CADLs (id. at 8), were further seized
21 from the Weddington residence.

22 A comparison of the evidence found on defendant's phone with her
23 husband's Artur Ayvazyan's phone reveals how Artur Ayvazyan followed
24 defendant's instructions to develop fraudulent identification
25 documents.¹ For example, a copy of a social security card and a CADL

27 ¹ During his trial testimony, Artur Ayvazyan denied knowledge of
28 the incriminating evidence on his phone but testified repeatedly that
- based on his knowledge of defendant's handwriting from their
(footnote cont'd on next page)

1 bearing the name Anna Dzukaeva were found on Artur Ayvazyan's phone.
2 (GEX 24b at 1-2.) However, Artur Ayvazyan also possessed images of a
3 second CADL bearing the name Anna Dzukaeva but a different photograph
4 were further found on his phone, indicating that at least one of the
5 CADLs was fraudulent. Artur Ayvazyan's phone further contained
6 images related to the creation of identification documents, including
7 images of CADLs with similar handwritten instructions on how to
8 modify the identification document, along with a matching, new CADL
9 image bearing different photographs and contact information in
10 accordance with the instructions, but the same name. (See GEX 24a.)
11 These handwritten instructions appeared to match the writing that
12 Artur Ayvazyan testified belonged to defendant, and were found in
13 defendant's office in their home. (See GEX 24a at 16-19; see also
14 GEX 57.f and 6/23/2021 A.M. Tr. 90:11-22 and 87:25-11-15 (testimony
15 of Artur Ayvazyan).) Notably, one of the fraudulent Anna Dzukaeva
16 CADL images found on both defendant and Artur Ayvazyan's phones was
17 used in an PPP application submitted on behalf of Six Star Farms in
18 the name of Anna Dzukaeva. (GEX 2-q at 29.) Defendant's phone
19 further contained screenshots confirming that an EIDL application had
20 been submitted using the email address "Annadzukaeva@mail.com". (GEX
21 13b at 3-4 and GEX 13d at 6.)

22 Second, defendant helped identify and direct the flow of
23 fraudulent proceeds to and from other members of the conspiracy,
24 including Artur Ayvazyan and her cousin and co-defendant, Vahe
25 Dadyan. For example, in text messages to Richard Ayvazyan, defendant

26 _____
27 sixteen years of marriage - many of the handwritten notes related to
28 the creation and use of identification documents found at the
Weddington residence were written in defendant's handwriting. (See,
e.g., 6/23/21 A.M. Transcript at 90:7-90:20 (identifying handwriting
on GEX 57.b at 3 as belonging to defendant.)

1 informed him that she's "expecting a wire for Art for \$73,500" (see
2 GEX 10 at 18 (text message 3504)), and provides an image showing a
3 wire transfer from New Acre Farm Produce and "Thanh P. Tran" to
4 "Runya (sic) Tax Service" for the purported purpose of "Payroll New
5 Acre Farm Produce." (6/21/21 P.M. Tr. 71:4-75:2 and GEX 10,
6 attachment 24 ("10-24")².)

7 This receipt corresponded to bank account records for New Acre
8 Farms showing an incoming PPP wire transfer for \$210,000. (GEX 110
9 at 21.) An image of the same wire receipt was also found on Artur
10 Ayvazyan's phone (GEX 24e at 4), along with images of the front and
11 back of Tran's California Driver's License ("CADL") (GEX 24c at 27-
12 28). Furthermore, 35% of the \$210,000 PPP loan is exactly \$73,500 -
13 corresponding to the "35 percent for ppp" that "Art" was going to
14 discuss with another individual to be recruited into submitting
15 fraudulent PPP applications, further described below. (GEX 10 at 17
16 (text message 3479).) Defendant was also assiduous in trying to
17 identify methods by which Richard Ayvazyan could send her cousin Vahe
18 Dadyan his share of the fraudulent PPP proceeds referenced in text
19 messages sent by defendant. (See GEX 10 at 16 (text message 3371)
20 ("Send em the account number again so I have Art go deposit the 157k
21 Vahe") and GEX 10 at 19-21.) Moreover, handwritten notes found in
22 defendant's home office show her directing the movement of criminal
23 proceeds through accounts in the names of various individuals and
24 companies. (GEX 57.f.) Paragraphs 41 and 42 of the PSR describe
25 other instances where defendant directed money laundering activities,
26 such that defendant's aggravating role adjustment would also be

28 ² Hereinafter, attachments to GEX 10 will be referenced by a
dash, as in "10-24" for GEX 10 attachment 24.

1 appropriate for her supervisory and organizing role in the
2 "laundering of criminally derived funds" under U.S.S.G. § 2S1.1. See
3 U.S.S.G. § 2S1.1 cmt. n.2(C).

4 Third, defendant was involved in directing and managing
5 additional co-conspirators. The text messages alone show defendant
6 directly managing at least three individuals - co-defendant Vahe
7 Dadyan, co-defendant and husband Artur Ayvazyan, and at least one
8 unindicted co-conspirator. For example, on or about July 2, 2020,
9 defendant informed Richard Ayvazyan that, "Tom coming over now I told
10 art show him the decline letter from the eidl and it's simple it's 35
11 percent for ppp." (GEX 10 at 18 (text message 3479).) Defendant was
12 further involved in helping co-defendant Richard Ayvazyan develop and
13 manage the submission of and flow of funds from at least 151 PPP and
14 EIDL applications, whose submission involved coordination with and
15 management of numerous other co-conspirators.

16 Based on the information described above, which illustrates the
17 significant supervisory and management role defendant played in this
18 extensive criminal conduct, the government is requesting a three-
19 level aggravating role enhancement. Providing a three-level
20 aggravating role enhancement to defendant would reflect her integral
21 part in the criminal conspiracies, while recognizing the larger share
22 claimed by Richard Ayvazyan and his wife, Marietta Terabelian, and
23 defendant's reliance on direction from Richard Ayvazyan in executing
24 her role in the crimes.³ (See U.S.S.G. § 3B1.1 Cmt. App. Note 4.)

26
27 ³ The government has requested a four-level enhancement for
28 Richard Ayvazyan because his role as leader was even more extensive
than defendant's. (See ECF 964 at 4-5; see also GEX 115, 116, and
GEX 10, including text message 3011 (Richard Ayvazyan telling
defendant, "No I told you I have the freaking formula").)

1 **The PSR Should Apply a Two-Level Enhancement for the Possession**
2 **of Five or More Means of Identification Unlawfully Produced or**
3 **Obtained by Another Means of Identification**

4 Defendant's offense level should be further increased another
5 two levels pursuant to one or both of U.S.S.G. § 2B1.1(b) (11) (C) (i)
6 and (ii). Specifically, a two-level enhancement applies under these
7 sections where "the offense involved . . . (C) (i) the unauthorized
8 transfer or use of any means of identification unlawfully to produce
9 or obtain any other means of identification, or (ii) the possession
10 of 5 or more means of identification that unlawfully were produced
11 from, or obtained by the use of, another means of identification."
12 USSG §2B1.1(b) (11) (C) (i), (ii). A means of identification is "any
13 name or number that may be used, alone or in conjunction with any
14 other information, to identify a specific individual." 18 U.S.C. §
15 1028(d) (7). Section 1028(d) (7) provides non-exhaustive examples of
16 means of identification, including: "(A) name, social security
17 number, date of birth, official State or government issued driver's
18 license or identification number, alien registration number,
19 government passport number, employer or taxpayer identification
20 number;" or "(C) unique electronic identification number, address, or
21 routing code." 18 U.S.C. § 1028(d) (7) (A), (C). The application
22 notes to § 2B1.1 provide further examples contemplating that both an
23 account number of a bank loan and a credit card are themselves means
24 of identification. See U.S.S.G. §2B1.1 cmt. n.10(C) (ii) (I), (II);
25 see also U.S.S.G. §2B1.1, cmt. background ("Because 18 U.S.C.
26 § 1028(d) broadly defines "means of identification", the new or
27 additional forms of identification can include items such as a
28 driver's license, a credit card, or a bank loan."); United States v.
Melendrez, 389 F.3d 829, 834 (9th Cir. 2004) (finding the enhancement

1 applicable where the defendant had used stolen social security
2 numbers to create false forms of identification).⁴

3 As described above, defendant possessed at the Weddington
4 residence and on her phone numerous means of identification that were
5 (a) used in support of creating fraudulent CADLs and/or (b) obtaining
6 debit and credit cards in the names of the stolen or synthetic
7 identities. For example, defendant texted numerous means of
8 identification for Mykhail Diuzhenko to Richard Ayvazyan, including a
9 photograph of his CADL and Social Security card, a photograph of the
10 front and back of a Visa Wells Fargo Business Platinum Debit card
11 bearing the same name and a business entity in whose name the
12 conspirators submitted fraudulent PPP and EIDL applications ("MD
13 Acquisition Serv"), and later texted a screenshot of a Wells Fargo
14 SBA Lending Promissory Note and Agreement in the name of Mykhail
15 Diuzhenko with the message, "Who's ur dadddy (sic) baby". (GEX 10-
16 30, 10-31, 10-32 and GEX 10 at 25 (text message 3949 and GEX 10-37).)
17 Diuzhenko's name was further used in a fraudulent IRS form 940 and
18 Gusto payroll forms submitted with a fraudulent EIDL application in
19 Diuzhenko's name on behalf of MD Acquisition Services. (GEX 3.1 at
20 1-3, 7-10). Notably, the same Diuzhenko CADL and Social Security
21 card texted by defendant to Richard Ayvazyan was found on her husband
22 Artur Ayvazyan's phone, along with numerous images of another CADL
23 bearing Diuzhenko's name but a different photograph. (GEX 24b at 11-
24 14.)

25
26 ⁴ The application notes to § 2B1.1 further provide that "means
27 of identification" has the meaning given that term in 18 U.S.C.
28 § 1028(d)(7), "except that such means of identification shall be of
an actual (i.e., not fictitious) individual, other than the defendant
or a person for whose conduct the defendant is accountable under
§ 1B1.3 (Relevant Conduct)." U.S.S.G. §2B1.1 cmt. n.1.

1 The text messages further show defendant and Richard Ayvazyan's
2 efforts to use the names and other means of identification of
3 numerous other individuals to open bank accounts in support of her
4 offenses of conviction. For example, defendant describes using the
5 identity of "alak" to submit fraudulent loan applications, noting
6 "Let's go the fool is dead on armo land" when Richard Ayvazyan noted
7 his credit score. (See GEX 10 at 9 (text messages 2944-2973).) When
8 asked if she had accounts in his name, defendant responds, "Yes
9 wells" followed by a message titled "You're one step away from
10 receiving Paycheck Program Program funds.png." (Id.) This deceased
11 individual's name is further referenced later in the text message
12 conversation when defendant attempts to open a corporate account for
13 Alak, asking, "Rich what bank can I open Corp account without going
14 to branch" and "There is the new alak Corp we got buy (sic) the
15 stupid wells online shit said come to branch". (GEX 10 at 20 (text
16 messages 3594-3595).) Defendant's success in establishing this
17 corporate account is further discussed when she and Richard Ayvazyan
18 are dealing with the freezing and closure of numerous accounts and
19 their attempts to open new ones. (See e.g., GEX 10 at 33-35.)
20 Defendant discusses her success in opening a new account, further
21 discussing her use of a stock purchase agreement to obtain control
22 since the account was opened in her own name but "the Corp online
23 everything belongs to Alak". (GEX 10 at 34-35 (text messages 4699-
24 4716).)

25 These are only two examples of names used to create numerous new
26 means of identification or possess fraudulently created means of
27 identification, which themselves would exceed the five or more
28 threshold established in the Guidelines. Other examples include, but

1 are not limited to, means of identification in the names of Anton
2 Kudiumov, Viktoria Kauichko, and many others. The government
3 therefore respectfully recommends that the two-level enhancement be
4 applied to defendant's offense level in accordance with U.S.S.G.
5 § 2B1.1(b)(11)(C)(i) and (ii).

6 **The PSR Should Apply a Two-Level Victim-related Adjustment**

7 The government further recommends that defendant's offense level
8 be increased by two because she "knew or should have known that a
9 victim of the offense was a vulnerable victim." U.S.S.G.
10 § 3A1.1(b)(1). As discussed above, the evidence found at defendant's
11 Weddington residence and her own text messages and phone show that
12 she deliberately targeted individuals who were vulnerable to their
13 information being exploited for use in the fraud, including foreign
14 exchange students who had left the United States years before COVID-
15 19 and were therefore unable to protect their identities from
16 exploitation, as well as the deceased.

17 This enhancement applies to individuals that are "unusually
18 vulnerable due to age, physical or mental condition, or who is
19 otherwise particularly susceptible to the criminal conduct."
20 U.S.S.G. § 3A1.1(b)(1) App. Note 2. The purpose of the adjustment is
21 to punish and deter criminals like defendant from victimizing those
22 who cannot protect themselves:

23 The "vulnerable victim" sentencing enhancement is intended
24 to reflect the fact that some potential crime victims have
25 a lower than average ability to protect themselves from the
26 criminal. Because criminals incur reduced risks and costs
27 in victimizing such people, a higher than average
28 punishment is necessary to deter the crimes against them. .
. . Defrauders who direct their activities not against
banks, insurance companies, or large investors, but instead
against people [with] . . . mental or educational
deficiencies, . . . do not need to take as many precautions
against the discovery of their scheme by the intended

1 victims and in any event are less likely to be prosecuted,
2 because the victims are less likely to know that they have
3 been defrauded or if they know to have the know-how and
initiative required to press a criminal complaint or bring
a civil suit.

4 United States v. Etoty, 679 F.3d 292, 296 (2012) (quoting United
5 States v. Grimes, 173 F.3d 634, 637 (7th Cir.1999)).

6 The number of J-1 visa-related documents found at the Weddington
7 residence shows that defendant and her co-conspirators deliberately
8 targeted foreign visitors who, once they left the United States,
9 would have little to no capacity to identify and protect their name
10 from use in a U.S. government supported disaster relief loan program.
11 This alone would be sufficient to qualify for the enhancement.
12 However, in addition to targeting such victims, defendant and her
13 coconspirators deliberately used the names of deceased individuals
14 who were no longer capable of protecting the fraudulent use of their
15 identity. See United States v. Cuellar, 165 F.3d 918 (9th Cir. 1998)
16 (applying "vulnerable victim" enhancement where defendant used the
17 identity of a deceased individual to fraudulently obtain a credit
18 card in the deceased's name). This is exemplified by defendant's
19 response to Richard Ayvazyan's text that she could submit two
20 applications using a victim's name, in which defendant writes, "Let's
21 go the fool is dead on armo land." (GEX 10 at 9 (text messages 2961-
22 2973); see also GEX 10 at 40 (defendant and R. Ayvazyan text about
23 sending emails in the name of Olaf Landsgaard, a deceased attorney).)

24 In addition to taking advantage of foreign students and visitors
25 and the deceased, defendant and her co-conspirators exploited victims
26 they knew were elderly. This includes, for example, an elderly
27 couple whose bank account defendant and Richard Ayvazyan used to
28

1 receive fraudulent EIDL proceeds. As described in text messages and
2 their attachments, S.G. was the recipient of Social Security
3 Disability payments on behalf of her spouse, who suffered from
4 Alzheimer's.⁵ (See GEX 10 at 32 (text messages 4471-4521), GEX 10-
5 46, GEX 10-47.) Although defendant and Richard Ayvazyan initially
6 took steps to try and resolve the situation, the response from
7 defendant and Richard Ayvazyan was distinctly less supportive when
8 the conversation turned to the account holder's fear and desire to
9 return the money. (See GEX 10 at 32 (text messages 4520-4521 (text
10 from defendant stating, "But this fools scared of everything u know"
11 with response from Richard Ayvazyan, "Ya babe that's why they bring
12 it on to themselves. Like if you can't handle the heat get out of
13 the fucken kitchen"), GEX 10 at 33 (text messages 4601-4604) (Richard
14 Ayvazyan responding to defendant's comments regarding the account
15 with, "I know but the idiot wants to send the money back" with
16 further expletives), and GEX 10-48.)

17 **Corrections and Clarifications**

18 In addition to the above, the government submits this response
19 to correct or clarify the following:

- 20 • In paragraph 5, the description of Count 24 should be
21 amended to state that, "co-defendant Arthur Ayvazyan and T.
22 Dadyan, each aiding and abetting the other, knowingly
23 transferred, possessed, and used, and willfully caused to
24 be transferred, possessed, and used, without lawful

25
26 ⁵ The definition for "victim" in a case that involves means of
27 identification includes "any individual whose means of identification
28 was used unlawfully or without authority." U.S.S.G. § 2B1.1, App.
Note 4(E)(ii). Given defendant and her co-conspirators use of S.G.'s
means of identification was unlawful (the receipt of fraudulent loan
proceeds), S.G. qualifies as a victim in this case.

1 authority means of identification . . .” (underline added
2 to emphasize revision).

- 3 • In footnote 2 appended to paragraph 34, the last sentence
4 should be revised to read, “On May 12, 2020, T. Dadyan
5 texted R. Ayvazyan that they ‘need to do the max’ now as
6 the market was going to crash” (underline added to
7 emphasize revision).
- 8 • In paragraph 15 under the section titled “Pretrial
9 Adjustment,” the description of defendant’s terms of
10 pretrial release should be revised to reflect that \$100,000
11 of her \$200,000 bond is secured by property posted by a
12 third-party surety. (See ECF 113, 115.)
- 13 • Paragraphs 16, 17, 18 and 23 under the section titled “Co-
14 Defendants” should be corrected to state that co-defendants
15 Richard Ayvazyan, Marietta Terabelian, Artur Ayvazyan, and
16 Vahe Dadyan were found guilty by jury trial on June 25,
17 2021, not June 28.
- 18 • The first sentence of paragraph 37 under the section titled
19 “T. Dadyan’s Conduct” should be revised to state that “T.
20 Dadyan submitted, caused to be submitted, and aided and
21 abetted . . .,” with the new proposed language underlined
22 above.
- 23 • The first sentence of paragraph 39 under the section titled
24 “T. Dadyan’s Conduct” should be revised to state that “. .
25 . others submitted and caused to be submitted to Wells
26 Fargo bank . . . , with the new proposed language underlined
27 above.

- 1 • In paragraph 41 under the section titled "T. Dadyan's
2 Conduct," the references to "A. Ayvazyan" should be
3 corrected to refer to "R. Ayvazyan." In addition, in the
4 last sentence of the paragraph, it appears the phrase
5 "caused to be wired" is missing after the words "then wired
6 and".
- 7 • The third sentence of paragraph 42 under the section titled
8 "T. Dadyan's Conduct" should be revised to state that "T.
9 Dadyan and her co-conspirators also submitted and caused
10 the submission of fake IRS Forms . . .," with the new
11 proposed language underlined above.
- 12 • The second to last sentence of paragraph 58 under the
13 section titled "Count Group 1: Money Laundering Conspiracy"
14 should be revised to state "T. Dadyan and her co-
15 conspirators also used fictitious identification documents
16 for the business . . .," with the new proposed language
17 underlined above.

18 Dated: September 27, 2021

Respectfully submitted,

19 TRACY L. WILKISON
Acting United States Attorney

20 SCOTT M. GARRINGER
21 Assistant United States Attorney
Chief, Criminal Division

22 /s/
23 _____
CATHERINE AHN
24 SCOTT PAETTY
BRIAN FAERSTEIN
25 Assistant United States Attorneys
CHRISTOPHER FENTON
Department of Justice Trial Attorney

26 Attorneys for Plaintiff
27 UNITED STATES OF AMERICA
28