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This material is distributed by Vinson & Elkins on behalf of Mr. Artyom Khachatryan. Additional information is available at the Department of Justice, Washington, DC. Vinson & Elkins has registered as an agent of Mr. Khachatryan pursuant to 22 U.S.C. § 614 in connection with this letter.

December 23, 2024

Warren Wilson
Economic Unit Chief
U.S. Department of State
U.S. Embassy in Armenia
Yerevan, Armenia

RE: Artyom Khachatryan – Successful Resolution of U.S. Legal Matters and Request for Visa

Mr. Wilson:

I am a partner with the international law firm of Vinson & Elkins, LLP (“V&E”) in Washington, D.C. I am writing on behalf of my client, Artyom Khachatryan (“my client” or “Mr. Khachatryan”), in connection with his request for a Visa to travel to the United States to attend the upcoming National Prayer Breakfast at the Washington Hilton in Washington, D.C. on February 5 and 6, 2025. Mr. Khachatryan received a personalized invitation to attend the National Prayer Breakfast from the Honorable Tom Suozzi (NY-3), Ben Cline (VA-6), and former Congressmen Zach Wamp, and Jim Slattery, and Mr. Khachatryan would very much like to attend. *See Attach. A.*

As you likely know, Mr. Khachatryan is a respected and well-known businessman in Armenia and a co-founder and co-chairman of the Galaxy Group of Companies, headquartered in Yerevan. Mr. Khachatryan is also a member in good standing of the American Chamber of Commerce in Armenia, and he has traveled to the United States many times, previously owned multiple properties in America, and he has a number of close family members and friends there. In addition to attending the National Prayer Breakfast, Mr. Khachatryan will use his time in America to help reconnect and develop his relationships with many colleagues and associates in the business community.

I understand that there has been some concern raised about the status of a now-closed investigation and recently resolved litigation involving the United States where my client was a claimant to real property in Los Angeles. I am pleased to inform you that Mr. Khachatryan entered into a settlement to resolve the civil matter on June 25, 2024, the terms of which the United States agreed to transfer certain proceeds from the sale of a property in Los Angeles with Mr. Khachatryan once that property is sold. *See United States v. Real Property in Los Angeles, California*, Civil Case No. 2:22-cv-02902-JLS-PD. *See Attach. B.* In addition, after a two-year investigation by the United States Department of Justice (“DOJ”), which appeared to have stemmed from a politically motivated referral and where my clients provided proactive, voluntary and fulsome cooperation with DOJ at all times, the government issued a formal investigation closure letter to my clients on June 11, 2024. The United States

Vinson & Elkins LLP Attorneys at Law
Austin Dallas Denver Dubai Dublin Houston London Los Angeles
New York Richmond San Francisco Tokyo Washington

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confirmed that it had “closed” its investigation without any enforcement action and that there were “no other ongoing criminal investigations” into my clients. *See Attach. C.*

Mr. Khachatryan no longer has any pending legal matters in the United States. As a result, to the extent such matters posed a barrier to entry for my client, we now respectfully request that the Embassy approve the visa so my client can attend the National Prayer Breakfast in February 2025, and also engage in productive business matters with American colleagues and associates while he is in the United States.

I hope this information is helpful. Please do not hesitate to contact me should you have any questions.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Ephraim (Fry) Wernick', with a large, sweeping flourish above the name.

Ephraim (Fry) Wernick

cc: Artyom Khachatryan

Attachment A

Begin forwarded message:

From: NPB Gathering <npb@intfriends.us>
Date: 3 November 2024 at 03:33:25 GMT+4
To: Artyom Khachatryan <artyom@galaxygroup.am>
Subject: Invitation to the 2025 NPB Gathering
Reply-To: npb@intfriends.us



2025 NPB GATHERING
WASHINGTON D.C.

October 14, 2024

Artyom Khachatryan

,

Dear Mr. Khachatryan:

We are pleased to invite you to our nation's capital for the 2025 NPB Gathering from February 5-6, 2025, at the Washington Hilton in Washington, D.C. During this time, friends and leaders from more than 140 nations will pray for our leaders in the United States as well as for leaders around the world. The intent of this gathering is to build and strengthen personal relationships and deepen international ties through our love for God and care for each other.

The President of the United States and Members of Congress will gather for the 73rd National Prayer Breakfast on Capitol Hill on Thursday, February 6. They will affirm their trust in God and engage in the reconciling power of prayer. We are very grateful that our nation's leaders gather in the Spirit of Jesus of Nazareth to pray together; and we will be joining them in those prayers.

The special activities of the NPB Gathering are an integral part of this occasion. They include dinner on Wednesday, February 5, as well as breakfast, seminars, lunch and dinner on Thursday, February 6. A [tentative schedule](#) of events is included for your review.

The total cost per person is \$590 per person – but only if you register prior to December 22. After that date, registration will be \$650 per person. Please [click here](#) to complete your registration.

If you are able to attend, we encourage you to stay at the Washington Hilton. You should make your reservation with the hotel directly. A [hotel link](#) is provided via our website for your convenience. Your prompt response is strongly encouraged and greatly appreciated as space cannot be guaranteed after January 2, 2025. Please be advised that this invitation is non-transferable, and the refund deadline is January 15, 2025.

Your tickets and nametag will be available for pick up beginning at 3:00pm on Tuesday, February 4, at the Washington Hilton in the Columbia Hall on the Terrace Level. We hope you will be able to join us for this unique gathering.

Sincerely,



The Honorable Tom Suozzi (NY-3)
U.S. Representative



The Honorable Ben Cline (VA-6)
U.S. Representative



Zach Wamp
Member of Congress 1995-2011



Jim Slattery
Member of Congress 1983-1995

[REGISTER NOW](#)

[REGRET](#)

EMAIL: NPB@INTFRIENDS.US

Not Printed at Government Expense

If you no longer want to receive emails from the NPB Gathering, please [Opt-Out](#).



Attachment B

1 MARGARET A. MOESER, Acting Chief
D. HUNTER SMITH, Trial Attorney
2 Money Laundering and Asset Recovery Section
Criminal Division
3 United States Department of Justice
1400 New York Avenue NW
4 Washington, DC 20005
Telephone: (202) 355-5705
5 Email: David.H.Smith@usdoj.gov

6 E. MARTIN ESTRADA
7 United States Attorney
MACK E. JENKINS
8 Assistant United States Attorney
Chief, Criminal Division
9 JONATHAN GALATZAN
Assistant United States Attorney
10 Chief, Asset Forfeiture and Recovery Section
MAXWELL COLL (Cal. Bar No. 312651)
11 Assistant United States Attorney
1100 United States Courthouse
12 312 North Spring Street
Los Angeles, California 90012
13 Telephone: (213) 894-1785
Facsimile: (213) 894-0142
14 E-mail: Maxwell.Coll@usdoj.gov

15 Attorneys for Plaintiff
UNITED STATES OF AMERICA

16 UNITED STATES DISTRICT COURT
17 FOR THE CENTRAL DISTRICT OF CALIFORNIA
18 WESTERN DIVISION

19 UNITED STATES OF AMERICA,

20 Plaintiff,

21 vs.

22 REAL PROPERTY IN LOS ANGELES,
23 CALIFORNIA,

24 Defendant.
25

No. 2:22-cv-02902-JLS-PDx

**STIPULATION AND REQUEST TO ENTER
CONSENT JUDGMENT OF FORFEITURE
[UNDER SEAL]**

1 **I. INTRODUCTION**

2 By the signatures of their counsel hereunder, Plaintiff United
3 States of America ("United States" or "the government"), and Claimants
4 WRH, Inc., Gurgen Khachatryan, and Artyom Khachatryan ("Claimants,"
5 and together with the United States, the "Parties"), respectively
6 request that the Court enter the Proposed Consent Judgment of
7 Forfeiture lodged contemporaneously herewith, to carry into effect the
8 terms of this stipulation (the "Stipulation"), which is dispositive
9 of this action.

10 Nothing in this Stipulation or the Proposed Consent Judgment is
11 intended to be or constitutes an admission of fault, wrongdoing,
12 liability, or guilt on the part of Claimants. The entry of the
13 Proposed Consent Judgment shall resolve all the government's civil
14 forfeiture claims that have arisen on or before the date of this
15 stipulation as to the defendant real property in Los Angeles,
16 California described as:

17 Lot 36 of Tract No. 9061, in the City of Los Angeles, County
18 of Los Angeles, State of California, as per Map recorded in
19 Book 121, Pages 64 to 66 inclusive of Maps, in the Office of
the County Recorder of said County

20 with Assessor's Parcel Number 4359-013-027 (the "Defendant Property"),
21 and also known as 530 South Mapleton Drive.

22 **II. PROCEDURAL HISTORY**

23 This action was commenced on May 22, 2022, against the Defendant
24 Property. The government gave and published notice of the action as
25 required by law, including Rule G of the Supplemental Rules for
26 Admiralty or Maritime Claims and Asset Forfeiture Actions, Federal
27 Rules of Civil Procedure, and the Local Rules of this Court.

28 Claimants WRH, Inc., Gurgen Khachatryan, and Artyom Khachatryan

1 timely filed a claim to the Defendant Property. (DE 11). Sedrak
2 Arustamyan filed the only other claim to the Defendant Property (DE
3 19), which he subsequently withdrew with prejudice. (DE 54). No other
4 claims were filed, and the time for filing claims has expired. Thus,
5 the only remaining claim is that of Claimants WRH, Inc., Gurgen
6 Khachatryan, and Artyom Khachatryan. Entry of the Proposed Consent
7 Judgment will resolve all claims of the Claimants with respect to the
8 Defendant Property and is dispositive of this action.

9 On August 29, 2022, this Court entered an Order authorizing
10 interlocutory sale of the Defendant Property. (DE 36).

11 **III. JURISDICTION AND TERMS**

12 **A. Jurisdiction And Basis For Forfeiture**

13 The Parties agree that this Court has jurisdiction over the
14 Parties, this action, and the Defendant Property for purposes of this
15 Stipulation. The Parties further agree that the allegations set out
16 in the operative complaint, if true, would be sufficient to establish
17 a basis for forfeiture of the Defendant Property. However, nothing
18 contained in this Stipulation or the Proposed Consent Judgment is
19 intended or should be interpreted as an admission of fault, guilt,
20 liability, or any form of wrongdoing by Claimants. Notwithstanding
21 any other provision of this Stipulation or the Proposed Consent
22 Judgment, the forfeiture of the Defendant Property does not constitute
23 a fine, penalty, or punitive damages.

24 **B. Terms**

25 1. The Parties, collectively and individually, and with the
26 authority and intent of their respective predecessors, assigns,
27 subsidiaries, parent companies, and affiliated entities, have entered
28

1 into this Stipulation to reach an agreement that forever resolves this
2 action.

3 2. The Proposed Consent Judgment provides that Claimants shall
4 forfeit to the government any right, title, or interest in the
5 Defendant Property, and that no other right, title, or interest shall
6 exist therein.

7 3. The Defendant Property has not been sold to date. As such,
8 the Parties stipulate and agree that the August 29, 2022 Order
9 authorizing interlocutory sale of the Property (DE 36) should be
10 vacated and the Defendant Property forfeited pursuant to the terms of
11 this Stipulation as set forth herein.

12 4. Upon forfeiture of the Defendant Property, the United States
13 Marshals Service ("USMS") shall attempt to sell the Defendant Property
14 at the highest obtainable market price as determined by the USMS, in
15 its sole discretion, in accordance with its policies and procedures.
16 The proceeds of any sale of the Defendant Property shall be distributed
17 as follows:

18 a. First, payment of the Parties' costs and
19 expenses of the sale, which shall include, as
20 applicable, real estate sales commissions (not
21 to exceed 4% of the total sales price); seller's
22 escrow fees; document recording fees; title
23 fees; county/city transfer fees and taxes
24 (including, if applicable, taxes pursuant to
25 Measure ULA); reasonable inspection, appraisal
26 and out-of-pocket fees incurred by the USMS's
27 real property contractor in connection with the
28 oversight, disposition and preservation of the

1 Defendant Property, including expenditures
2 incurred pursuant to paragraph 1 of the
3 supplemental stipulation (Dkt. 75); and any
4 liens against the Property, including
5 materialman's and mechanic's liens, and any
6 utilities or other expenses customarily
7 required to complete a sale;

8
9 b. Second, payment of any outstanding real
10 property taxes to the relevant treasurer-tax
11 collector to the date of closing of escrow, up
12 to the available proceeds of the sale; and

13
14 c. Third, to the extent funds remain (the "Net
15 Proceeds"), 85% of such Net Proceeds shall be
16 retained by the United States of America and 15%
17 shall be released to Claimants (the "Released
18 Funds"), according to the terms of this
19 Stipulation.

20
21 5. In the event that any of the fees, costs, expenses, or taxes
22 described in Paragraphs 4(a) and 4(b) are refunded to the United States
23 or Claimants, they shall be added to the Net Proceeds and allocated
24 as set forth in Paragraph 4(c), except that the amounts of any real
25 property taxes paid by Claimants before forfeiture that are refunded
26 or credited, in whole or in part, because they accrued or would have
27 accrued after forfeiture shall not be added to the Net Proceeds and
28 shall be refunded or credited in full to Claimants.

1 6. Claimants acknowledge that payments from the United States,
2 including payment of the Released Funds, must be processed by the
3 Department of Treasury, which may offset the payment to collect
4 delinquent debts owed to the United States, any state, or past-due
5 child support. Neither the Department of Justice nor the United States
6 Marshals Service will receive any notification of any such offset. If
7 a payment is offset or levied, Claimants will receive notification
8 from the Department of Treasury at the last address provided by the
9 debtor or the creditor agency. Claimants may also call the Department
10 of Treasury at (800) 304-3107 to inquire if their payment was subject
11 to an offset.

12 7. It is the present intention of the Money Laundering and
13 Asset Recovery Section of the U.S. Department of Justice and the U.S.
14 Attorney's Office for the Central District of California to recommend
15 that the Net Proceeds retained by the United States, if appropriate
16 and authorized by law, be used for the benefit of the people of the
17 Republic of Armenia, after deduction of the government's associated
18 costs, consistent with the government's prior practice in similar
19 cases.

20 8. Claimants acknowledge that disposition of the Net Proceeds
21 retained by the United States is within the sole discretion of the
22 United States in accordance with law. It is Claimants' request that
23 such funds be disbursed to the Republic of Armenia.

24 9. The Released Funds shall be paid to one or more bank
25 account(s) to which payment may be made consistent with United States
26 law as directed by Vinson & Elkins LLP ("Vinson & Elkins"). Vinson &
27 Elkins shall provide all information required to facilitate the
28 payment, including personal identification information required by

1 federal law or regulation, and shall complete all required documents.
2 The payment of the Released Funds shall be made no later than 90 days
3 after the closing of any sale of the Defendant Property, except that,
4 if 90 days after the closing of such sale, the amount of the fees,
5 costs, expenses, or taxes described in Paragraphs 4(a) and 4(b) above
6 cannot be reasonably determined, the United States shall be permitted
7 to hold in escrow such portion of the Released Funds that may be needed
8 to satisfy such fees, costs, expenses, or taxes, until such time as
9 they can be reasonably determined.

10 10. The government agrees that it shall not now nor in the future
11 institute any action against Vinson & Elkins and/or Claimants, or seek
12 the seizure, freezing, return, forfeiture, or restraint of any kind
13 of any of the Released Funds, nor any interest earned on the Released
14 Funds, for any acts or omissions preceding the date of this Stipulation
15 and arising out of this action.

16 11. Claimants shall not contest or assist any other individual
17 or entity in contesting the forfeiture--whether administrative, civil,
18 or criminal--or sale of the Defendant Property, and shall cooperate
19 in all respects with such forfeiture and sale.

20 12. Claimants shall execute such documents, and request that
21 third parties execute such documents, as requested by the government
22 for the purposes of facilitating transfer or clearing of title to and
23 management or sale of the Defendant Property.

24 13. Claimants release the United States of America, its
25 agencies, agents, and officers, including employees and agents of the
26 Federal Bureau of Investigation and USMS, and its contractors, from
27 any and all claims, actions, or liabilities arising out of or related
28 to the seizure, retention, forfeiture, and sale of the Defendant

1 Property and the commencement of this action, including any claim for
2 attorneys' fees or costs, which may be asserted against the United
3 States, whether pursuant to 28 U.S.C. § 2465 or otherwise. Claimants
4 waive any rights they may have to remission or mitigation in connection
5 with the forfeiture of the Defendant Property.

6 14. The Parties shall attempt in good faith to resolve any
7 disputes about the interpretation of or compliance with the terms of
8 this Stipulation or the Proposed Consent Judgment. Should the Parties
9 be unable to resolve any such dispute, either party may move the Court
10 to resolve the dispute and to impose any remedy this Court deems
11 necessary to enforce the terms of this Stipulation and Proposed Consent
12 Judgment.

13 15. The Parties further stipulate and agree that the Court's
14 entry of the Proposed Consent Judgment shall constitute final and
15 complete satisfaction of all claims asserted by the government and
16 Claimants as relates to this action with respect to the Defendant
17 Property. The Parties agree that they will not appeal the Court's
18 entry of the Proposed Consent Judgment and hereby waive appeal of the
19 entry of such judgment and of all prior orders of the Court merged

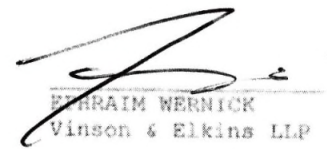
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1 therein. Except as expressly provided otherwise in this Stipulation,
2 each of the Parties shall bear its own fees and costs in connection
3 with the seizure, retention, and forfeiture of the Defendant Property.

4 SO STIPULATED.

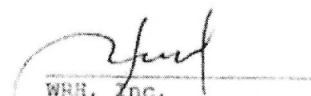
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6
7 MARGARET A. MOESER,
8 Acting Chief
9 Money Laundering and Asset
10 Recovery Section,
11 Criminal Division
12 United States Department
13 of Justice

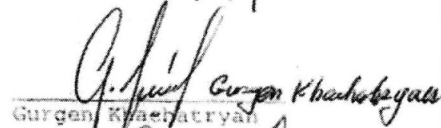

ESHRAIM WERNICK
Vinson & Elkins LLP

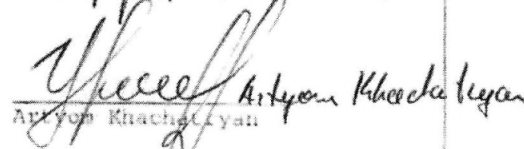
Attorney for Claimants WRH,
Inc., Gurgen Khachatryan,
and Artyom Khachatryan


14
15 
16 D. HUNTER SMITH, Trial
17 Attorney

18 E. MARTIN ESTRADA
19 United States Attorney
20 MACK E. JENKINS
21 Assistant United States
22 Attorney
23 Chief, Criminal Division
24 JONATHAN GALATZAN
25 Assistant United States
26 Attorney
27 Chief, Asset Forfeiture
28 Section


WRH, Inc.
Printed Name: Ted Khachatryan
Title: Secretary


Gurgen Khachatryan


Artyom Khachatryan

29
30 
31 MAXWELL COLL
32 Assistant United States
33 Attorney
34
35 Attorneys for Plaintiff
36 UNITED STATES OF AMERICA

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. 2:22-cv-02902-JLS-PDx
)	
Plaintiff,)	CONSENT JUDGMENT OF FORFEITURE
)	
v.)	
)	
REAL PROPERTY IN LOS ANGELES,)	
CALIFORNIA,)	
)	
Defendant.)	
_____)	

WHEREAS Plaintiff United States of America ("United States" or "the government"), and Claimants WRH, Inc., Gurgen Khachatryan, and Artyom Khachatryan ("Claimants," and together with the United States, the "Parties"), have made a stipulated request (the "Stipulation") for the entry of this Consent Judgment, which is dispositive of this action;

NOW THEREFORE, the Court, having considered the Stipulation and the record of this case, and good cause appearing therefor, HEREBY FINDS, ORDERS, ADJUDGES AND DECREES:

1. The Court approves the terms of the Stipulation and

1 incorporates them into this Consent Judgment.

2 2. A judgment of forfeiture is entered for the United States as
3 to the defendant real property in Los Angeles, California described
4 as:

5 Lot 36 of Tract No. 9061, in the City of Los Angeles, County
6 of Los Angeles, State of California, as per Map recorded in
7 Book 121, Pages 64 to 66 inclusive of Maps, in the Office of
the County Recorder of said County

8 with Assessor's Parcel Number 4359-013-027 (the "Defendant Property"),
9 and also known as 530 South Mapleton Drive. Title to the Defendant
10 Property, and all rights and interests therein, is forfeited to the
11 United States. Upon entry of this Consent Judgment, only the United
12 States shall have any interest in the Defendant Property. Any and all
13 interests that any other party may have had in the Defendant Property
14 are hereby extinguished.

15 3. This Court's order authorizing interlocutory sale of real
16 property and substitution of the res (DE 36) is hereby vacated.

17 4. The United States shall dispose of the Defendant Property in
18 accordance with the law and the terms of the Stipulation and shall be
19 able convey clear title to the Defendant Property. As provided in the
20 Stipulation, Claimants shall have an interest in the net proceeds of
21 any sale of the Defendant Property.

22 5. The Court shall retain jurisdiction to effectuate the terms
23 of this Consent Judgment and the Stipulation.

24 DATED: June 30, 2024



25
26 HON. JOSEPHINE L. STATON
UNITED STATES DISTRICT JUDGE

27
28

Attachment C



Money Laundering and Asset Recovery Section

U.S. Department of Justice
Criminal Division

1400 New York Avenue, NW, 10th Floor
Washington, D.C. 20005

June 11, 2024

Via Email

Ephraim Wernick, Esq.
Vinson & Elkins LLP
2200 Pennsylvania Avenue NW
Suite 500 West
Washington, DC 20037
ewernick@velaw.com

Dear Mr. Wernick:

The United States Department of Justice, Criminal Division, Money Laundering and Asset Recovery Section and the United States Attorney's Office for the Central District of California (the "Offices") have closed their criminal investigation related to Gurgen Khachatryan, Artyom Khachatryan, Aram Khachatryan and WRH, Inc. ("your clients") concerning allegations of money laundering related to the purchase of 530 South Mapleton Drive and other properties in the United States. The Offices have no other ongoing criminal investigation into your clients at this time. This letter should not be read as a determination that criminal conduct did or did not occur and is not intended to have any effect on pending or potential investigations or prosecutions in the Republic of Armenia. The Offices may re-open their investigation, at their discretion, in the event they obtain new evidence.

Sincerely,

MARGARET A. MOESER,
ACTING CHIEF

A handwritten signature in blue ink that reads "D. Hunter Smith".

D. Hunter Smith
Money Laundering and Asset Recovery Section
U.S. Department of Justice
1400 New York Ave, NW, Suite 10100
Washington, DC 20005

E. MARTIN ESTRADA
UNITED STATES ATTORNEY

A handwritten signature in blue ink that reads "Maxwell Coll".

Maxwell Coll
Assistant United States Attorney
U.S. Attorney's Office for the
Central District of California
312 North Spring Street, Suite 1100
Los Angeles, CA 90012