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RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA)
14 v.)
15 VLADIMIR HANDL, et al.,)
16 Defendants.)

15-CR-0126-WHA

NOTICE OF RELATED CASES

18 UNITED STATES OF AMERICA)
19 v.)
20 ARA KARAPEDYAN, et al.,)
21 Defendants.)
22

15-CR-0234-CRB

24 The United States of America, pursuant to Local Criminal Rule 8-1, hereby notifies the Court
25 that the above-captioned criminal cases are related.

26 Both of the cases captioned above, 15-CR-0126-WHA and 15-CR-0234-CRB, derive from a
27 single investigation and involve a common set of witnesses, including, significantly, a particular
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1 undercover law enforcement agent. In addition, the Government intends to present evidence in both
2 cases that Vladimir Handl, the lead defendant in 15-CR-0126-WHA, engaged in money laundering with
3 Ara Karapedyan, the lead defendant in 15-CR-0234-CRB. Accordingly, both cases present overlapping
4 issues for litigation relating to the evidence, the pleadings, discovery, and potential defenses.

5 Per the requirements of Local Criminal Rule 8-1(c)(4), government counsel states that relating
6 the more recent case, 15-CR-0234-CRB, to the prior case, 15-CR-0126-WHA, is likely to conserve
7 judicial resources and promote an efficient determination of both actions. The cases are related within
8 the meaning of Local Rule 8-1(b)(2) because, if heard by different judges, the cases would involve
9 substantial duplication of labor and may result in inconsistent factual findings and legal rulings.

10 Furthermore, as noted above, both cases involve evidence inculcating Vladimir Handl in
11 criminal activity. Thus, out of an abundance of caution, the Government would note that Handl is
12 represented by the law firm of Coblenz, Patch, Duffy & Bass, LLP, which may or may not be a relevant
13 fact in the assignments of 15-CR-0126 and 15-CR-0234.

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15 DATED: May 21, 2015

Respectfully submitted,

MELINDA HAAG
United States Attorney

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18 By: /s/
W.S. Wilson Leung
Assistant United States Attorney
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