

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

| | | |
|--------------------------|---|------------------------------------|
| UNITED STATES OF AMERICA |) | 19-cr-10081-IT |
| |) | |
| v. |) | Leave to File Partially Under Seal |
| |) | Granted on August 2, 2022 |
| IGOR DVORSKIY |) | |
| |) | |
| Defendant. |) | |

DEFENDANT IGOR DVORSKIY’S SENTENCING MEMORANDUM

I. Introduction

Igor Dvorskiy, a 55-year old asylee from Ukraine, with no criminal history, is before this Court for sentencing on one count of racketeering conspiracy. The parties agree that a prison sentence is unnecessary to meet the objectives of 18 U.S.C. § 3553(a), though the government is asking this Court to impose a sentence that includes three months of home confinement. Mr. Dvorskiy respectfully submits that a sentence of time served followed by one year of supervised release is appropriate.

Like many of the defendants in this case, until he met Rick Singer, Igor had lived a law-abiding life defined by hard work, contributing to his community, and devotion to his family. As set forth herein, Igor feels deep remorse for his involvement in the offense conduct and the impact that it has had on his family, community, and the college admissions system. He takes full responsibility for his participation and he accepts the consequences of his guilty plea.

There are three notable facts about Igor that, taken together, set him apart from most, if not all, of the dozens of defendants charged in the “varsity blues” cases. *First*, Igor does not hold a position of wealth, privilege, or power. He did not attend or work at an elite university, he is

not a sophisticated businessman, and he is not politically connected. Igor was born into relatively humble means in Kiev, Ukraine (then part of the Soviet Union) and throughout his childhood and young adulthood was discriminated against because he and his family are Jewish. Igor later fled to the United States where, through extraordinary hard work and perseverance, he managed to create a loving family unit, a network of caring friends, and, with West Hollywood College Preparatory School (WHCP), a special and unique educational community. Throughout it all, Igor has given much of himself to others while living a modest life. *Second*, Igor's actions were not motivated by a desire to personally enrich himself or to obtain status or prestige for himself or his family members. He deposited every single check that he received from Rick Singer's Key Worldwide Foundation (KWF) into the WHCP's bank account where it was used for the normal operating expenses of the school that Igor was so devoted to. *Third*, Igor quickly accepted responsibility for his conduct, demonstrated his sincere remorse, [REDACTED]. Other defendants pleaded guilty well after Igor, [REDACTED], but have long-since been sentenced and moved on with their lives. Igor, in contrast, [REDACTED].

II. Factual Background

A. Igor Dvorskiy's Personal Background and Character

Igor was born in Kiev, Ukraine in 1966.¹ The only child of Emmanuil Dvorksiy and Elina Dvorskaya, Igor grew up in the former Soviet Union with his basic needs provided for. However, he and his family experienced significant anti-Semitism including, for Igor, physical assaults and other forms of discrimination that prevented him from reaching his full potential in

¹ The facts set forth herein are from the Pre-Sentence Investigation Report or, where noted, from the attached letters in support which have been filed as Exhibits.

school and work. Igor married Olga Lozutsкая in 1993 and the following year the couple, along with Igor's parents, fled to the United States where they sought, and were eventually granted, asylum from religious persecution. Igor, his parents, and Olga are now all naturalized United States citizens.

Igor and Olga have three college-aged children: [REDACTED]. Although Igor and Olga are currently living separately (mainly because Igor is residing with and taking care of his elderly parents), Olga relays that Igor is a caring, helpful, and understanding husband who has a close relationship with her and their children. These qualities are echoed in many of the letters from Igor's friends, who observe Igor's wonderful relationship with his family (his children are often described as kind and good-natured) and his exceptional efforts to help others. *See Ex. A (Letters from family friends).*

Igor is a devoted son and caretaker. His mother, Elina, is almost 82, and in the last several years has had increasingly debilitating hand tremors which have made it nearly impossible for her to feed herself and perform other daily activities without help. Emmanuil, Igor's father, is 84, and had been taking care of Elina until two recent stomach surgeries which have significantly debilitated him and required around the clock care. Igor has become the primary caregiver for both of his parents, driving them to medical appointments, buying groceries, and taking care of other needed tasks.

Caregiving comes naturally to Igor. Though trained as an electrical engineer in Ukraine, after arriving in the United States Igor first worked as a home health aide. Three individuals who worked with Igor at this time have submitted letters on his behalf. The letters are notable because, more than 25 years later, they each recall how Igor brought a special kindness, positive attitude, and compassionate demeanor to the often challenging work that home health aides

perform. *See* Ex. B (Letters related to Igor's early work in the United States.) In the late 1990s and early 2000s Igor worked as a software engineer; former colleagues from this time similarly describe how impressed they were with Igor both professionally and personally. *Id.*

Around 2001 Igor joined his mother Elina at WHCP, the school she founded. As the letters submitted by teachers, staff, parents, and students attest, Igor became nothing less than the heart and soul of WHCP. *See* Ex. C (Letters from WHCP teachers and staff) and Ex. D (Letters from WHCP parents and students). No task was too small for Igor to perform, no problem too challenging for him to solve. He helped students with their academic, social, and emotional challenges. He helped staff and parents through financial difficulty and sickness. The WHCP teachers and staff write that Igor was trustworthy and fair. The WHCP parents observe that he genuinely cared for their children and worked hard to foster a school environment that had a strong curriculum but was also, importantly, a supportive and close-knit community. *Id.* The letters are remarkable because, written by diverse individuals who have in many cases known Igor for decades, they uniformly describe Igor as an exceptionally caring and supportive boss and a beloved school Director who consistently went above and beyond for his school community.

And as several letters reflect, Igor's generous spirit extends well beyond WHCP. As a particularly timely and poignant example, since the Russian invasion of Ukraine earlier this year, Igor has been assisting Ukrainians fleeing war and seeking refuge in the United States. He has helped Ukrainian refugees navigate complicated paperwork, he has organized logistics (literally picking up a refugee at the border), he has provided a warm welcome into the Los Angeles Ukrainian community, and he has spearheaded fundraising efforts. *See* Ex. E (Letters discussing Igor's efforts).

B. Igor Dvorskiy's Involvement in the Offense Conduct

Igor is a trusting person whose main goal in life has been to care for his family and find opportunities to improve WHCP. That made him an ideal target for Rick Singer. When Singer initially reached out to Igor, it was about one of Igor's students that Singer was helping. Singer quickly pivoted the conversation to ways that KWF, which he described as a non-profit organization that helped underserved kids, and WHCP, could collaborate. Singer came across as successful and impressive and Igor was taken with his confident demeanor and interest in Igor's small school. Ex. F (Letter from Igor Dvorskiy).

Against that backdrop, when Singer first asked Igor about using WHCP as a testing site, Igor believed that it was a perfectly legitimate and appropriate request. Igor did not know, yet, that Mark Riddell would be changing students' answers or that Igor would be told to falsely certify test information. Igor believed that the \$25,000 that Singer offered was justified because Igor was registering WHCP as a testing site, opening the school campus over a weekend, working as a test administrator, and performing related tasks. He also believed that KWF was a successful non-profit that helped kids in need – a belief he continued to hold throughout his involvement with Singer. In short, Igor viewed the arrangement as him providing a useful space and service to a worthy organization in exchange for a fee that he thought was likely commensurate with other organizations that offer their facilities for college admissions testing. *Id.*

The first time that Singer sent a student to WHCP to take an exam, Igor opened the school, dutifully checked the student's identification against the test (something he continued to do for every test), and thought that Mark Riddell was present as a legitimate proctor. When the

exam concluded and Riddell and Singer instructed Igor to list his own name as the exam proctor (not Riddell's) and to falsely claim that the exam was taken over two days (not one), Igor did not fully understand why he was being asked to make false statements, but he went along with it.

Before the second set of tests, Singer asked Igor if he would accept a lower administrative fee because, Singer claimed, it was for a needy child who Singer was going to pay for himself. Igor, still unaware of the scheme and under the impression that he was assisting under-served children, told Singer that he would love to help. Igor then oversaw another exam where the only irregularity was that Igor was told to write his own name as the proctor, which he again did.

It was during the next set of exams that Igor began to realize that Riddell was changing the students' exam answers and that Igor's own act of submitting incorrect information to the testing agencies was complicit. Rather than say anything, or stop, to his shame and regret, Igor continued working as a test administrator, allowing Riddell to change answers, and submitting false information to the College Board and the ACT. In total, Igor administrated tests over 11 days often with several students each day. He knew that Riddell was changing answers on the exams and he knowingly, and repeatedly, submitted false information to the College Board and the ACT. Igor deposited \$198,000 in payments from KWF into the WHCP bank account. [REDACTED]

[REDACTED]

[REDACTED]

Igor takes complete responsibility for his conduct that has resulted in his criminal conviction. He knows that he should not have allowed cheating or participated in submitting false information to the College Board or ACT. Igor recognizes that he comforted himself in his mistaken belief that he was also helping WHCP, the school and community that he loves so

much. As he writes in his letter to the Court, Igor now realizes that he hurt the very community that he was trying to help. He also recognizes the impact that his actions have had on the college admissions system more broadly, and sincerely regrets his involvement. Ex. E.

At the same time, it is notable that Igor deposited all of the checks he received – those that he received *before* he was aware of the scheme as well as those he received once he was an active participant – into the WHCP bank account. In other words, Igor’s purpose in working with Rick Singer was not to personally enrich himself. It is also relevant that Igor was unaware that the money from Singer had originated with the parents of the children exam-takers, or even that the exam-takers were the children of wealthy individuals. Igor had few communications with Riddell outside of arranging logistics at Riddell’s request and exchanging test-day niceties, and his interactions with Singer were comparatively business-like. Igor viewed Singer’s organization as a successful non-profit and believed that Singer was providing varied services, including testing accommodations (and testing assistance via Riddell) for needy students, at WHCP.

III. The Sentencing Guidelines and Section 3553(a) Factors

In sentencing Igor, the Court must arrive at a sentence sufficient, but not greater than necessary, to achieve the goals of sentencing. *See* 18 U.S.C. § 3553(a). The Supreme Court has stressed that this principle – not the Guidelines – is the most important overall factor in the Court’s sentencing decision. *Kimbrough v. United States*, 552 U.S. 85, 109-111 (2007). While “the Guidelines should be the starting point and the initial benchmark,” the district court “must then consider the arguments of the parties and the factors set forth in 3553(a).” *Peugh v. United States*, 569 U.S. 530, 536 (2013) (internal quotation marks omitted). “The district court may not presume that the guideline range is reasonable.” *Id.* (internal quotation marks omitted); *see also Rita v. United States*, 551 U.S. 338, 351-52 (2007).

A. The Guidelines

On November 13, 2019, Igor pleaded guilty to a violation of 18 U.S.C. § 1962(d), racketeering conspiracy. The plea agreement reflects the parties' agreement to the following Guidelines calculation:

Base Offense Level: 8 (U.S.S.G. §§ 2E1.1(a)(2), 2(B)(4))
 Loss over \$150,000: 10 (U.S.S.G. §§ 2B4.1(b)(1)(B), 2B1.1(b)(1)(F))
 Abuse Posit. Trust: 2 (U.S.S.G. §3B1.3)
 Acceptance Resp.: -3 (U.S.S.G. § 3E1.1)
 Total Offense Level: 17

Probation has calculated the Guidelines differently, concluding that the total offense level is 16. The difference is based on the Court's previous determination that there was no foreseeable pecuniary harm to the testing agencies or universities, and that since there was no financial loss, gain cannot be used as an alternative measure of loss. Accordingly Probation notes that a calculation under U.S.S.G. § 2B1.1 would result in an adjusted offense level of 6 (after applying U.S.S.G. § 2B1.1(a)(2)). Since the default racketeering offense level is greater than 6 for the underlying offenses, Probation applies a base offense level of 19 with 3 points off for acceptance of responsibility, resulting in a total offense level of 16.

Because Igor has no prior convictions, he is in criminal history category I. The resulting guidelines range is 24-30 months (based on the parties' plea agreement) or 21-27 months (based on Probation's calculation).

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B. Overview of the Relevant Section 3553(a) Factors

The nature and circumstances of the offense and the history and characteristics of the defendant.

As set forth above, Igor was gradually pulled in to the offense conduct – first as an unknowing test administrator and then as a willing, though subservient, participant. To be sure, once Igor became aware that Riddell was changing exam answers he allowed and facilitated the cheating. Igor also knowingly submitted false information to the College Board and the ACT and accepted payment in exchange for the use of the WHCP campus and his own, improper, services. But in mitigation, Igor believed KWF was a legitimate organization that assisted low income children and he never understood the full scope of Singer’s scheme. Nor did Igor act out of a desire to personally profit from his involvement with Singer; rather, he was motivated by the opportunity to bring needed funds to WHCP.

The 49 letters submitted on Igor’s behalf speak to his life history and personal characteristics. Although Igor met the letter writers at different stages of his life and through varied experiences, some common themes emerge. First, most of the individuals who have submitted letters are people who have had long-term relationships with Igor, often spanning decades. It is reflective of that fact that Igor has created meaningful and lasting connections with the people in his life. Second, the letters consistently describe that Igor is a giver. He gives of his time, his expertise, and his money. He gives in small ways and big. But what is clear is that Igor is someone that people turn to in times of need, and he is unwaveringly there for them. Third, with WHCP, Igor and Elina have created a special school that fosters not only education but also, community. The school, through its teachers and staff (including Igor) has touched many lives in its more than 20 years of existence and it continues to be a unique learning environment. Last,

Igor values family. He and Olga have been married for 28 years and have raised three well-adjusted, kind, well-liked children. Igor cares deeply for his elderly parents and is their main source of assistance. These are qualities that Igor's friends, co-workers, and community observe to be paramount to Igor.

The need for the sentence to promote respect for the law.

The instant offense is an aberration from Igor's otherwise law-abiding life and Igor has readily demonstrated his respect for the law through his prompt acceptance of responsibility. Igor is dedicated to remediating the harm stemming from his actions. He not only took responsibility for his conduct early, he also [REDACTED].² [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]. The PSR notes that in the three and a half years since his arrest, Igor has complied with all Court-ordered conditions of release.

The need for the sentence to afford adequate deterrence to criminal conduct.

There is no need for a sentence of incarceration, or even house arrest, to deter Igor from future criminal conduct. The offense conduct was an aberration in an otherwise law-abiding life. The offense was committed under a unique set of circumstances that are unlikely to ever arise again. Given Igor's relative culpability, a sentence of time served with a year of supervised release is sufficient to promote general deterrence.

² The first few defendants who pleaded guilty in this case did so shortly after being charged and, for some, before reviewing discovery. Given the novel nature of the charges and counsel's ethical duty to fully and appropriately advise her client, Igor heeded a slightly more conservative approach, waiting until after he and his counsel had an opportunity to review the discovery. [REDACTED]

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The need to avoid unwarranted sentence disparities among defendants with similar records who have been found guilty of similar conduct.

The conduct of the other test administrator in this case, defendant Niki Williams, is most similar to Igor. Both Igor and Williams allowed Riddell to change students' answers on exams, and both submitted false information to the College Board and ACT. At first glance, Igor's conduct is more egregious because he presided over more test days (eleven³ compared to Williams' five) more students (sixteen compared to Williams' five), and received more money (\$198,000 to WHCP and [REDACTED] compared to Williams' \$12,500). However, a few differences are worth mentioning.

To begin with, Williams knew more about the overall scheme than Igor and she participated in it for a longer time period. In addition, given that Igor did not keep the money from Singer for himself [REDACTED], the personal benefit to both individuals was roughly the same, though Igor, of course, also sought to benefit WHCP. And although Igor acknowledges that he engaged in fraudulent conduct, he simultaneously viewed himself as performing a service. In that vein, he checked every students' identification badges against their exams and made efforts to create an environment conducive to test taking. In contrast, Williams allowed Riddell to take an exam to his hotel room and complete the exam without the student ever showing up.

Also relevant is the fact that Igor accepted responsibility a year before Williams [REDACTED]

[REDACTED]. Williams pleaded guilty after months of litigation, [REDACTED]

³ This includes the first several tests during which Igor was unaware of the cheating on the exams.

[REDACTED], and she was sentenced to one year of probation in December 2020. Her case has long since been resolved as Igor has waited, patiently, for his day before the Court.

IV. Conclusion

Igor's actions that led to his conviction are an aberration from a life otherwise dedicated to hard work, caring for his family, and devotion to the community, particularly, WHCP. He has demonstrated his sincere remorse through his speedy acceptance of responsibility and [REDACTED]

[REDACTED]. Igor respectfully requests that he be sentenced to time served and one year of supervised release.

Dated: August 2, 2022

Respectfully submitted,

IGOR DVORSKIY,
By his attorney,

/s/ Melissa A. Weinberger
Melissa A. Weinberger
Touchton & Weinberger LLP
800 Wilshire Blvd., Suite 1050
Los Angeles, CA 90017
Phone: (213) 867-6350
Fax: (213) 673-1386
Email: melissa@twcounsel.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed electronically on August 2, 2022 and delivered by electronic means to counsel for the government.

/s/ Melissa A. Weinberger
Melissa A. Weinberger

EXHIBIT A

EXHIBIT A

To: The Honorable Indira Talwani
United States District Judge, John Joseph Moakley U.S. Courthouse1 Courthouse Way, Suite
2300 Boston, Massachusetts 02210

From: Mrs. T Gakman

Your Honor,

I am Mrs. T. Gakman. I was born on [REDACTED]/1943. After I graduated from the Far East State University in Vladivostok, Russia in 1966, I worked as a lecturer at the Pedagogical Institute in Russia. In 1972 I came to Kiev, where I met Mrs. Elina Dvorskaya, the teacher and head of the department of teachers in the mathematics department in the Pedagogical Institute. I then met her son, Igor Dvorskiy. He was in 7th grade at that time and was nicknamed "The Helper" due to his zealous willingness to offer help to students, teachers, and anyone who needed it. Igor would bring us food from home, supplies needed for the school, and anything else that he noticed we needed. All this he performed unasked by us. He truly has a kind heart, just like his mother.

I would like to relate one episode that I think is characteristic of Igor's kind and compassionate personality. One of my pupils at that time had serious problems with math. He was not receiving extra help and was failing the class. Igor learned about the student's academic difficulties and offered to tutor him in math. Igor dedicated much of his free time helping this student. As a consequence of Igor's help, the student was able to pass the math class with a good grade, which improved the student's attitude and overall scholastic performance.

However, despite his talents and desire to help others, Igor could not attend Kiev State University due to his open Jewish identity, anti-Semitism being pervasive at that time in the Ukraine. Igor could not fulfill his dream of becoming a teacher. He was declined admission to the university based solely on his open commitment to his Jewish identity. This was tragic for a young man so full of dreams and a passionate desire to help others.

Consequently, Igor had to change direction and graduated instead from the Polytechnic Institute. Yet he always remained involved in education in some capacity at the school his mother founded in Kiev.

Finally, Igor was able to fulfill his dreams of becoming a teacher when he and his mother moved to America in the '90s and opened West Hollywood College Preparatory School. Thank you for your time.

Respectfully,

T. Gakman



Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210 2.

Character Letters for Igor Dvorskiy

My name is Olga Belchenko, and I work at Hygiena - biotechnology company in Camarillo, California, as a Software QA manager.

I have moved to USA as a refugee in 1994 together with my family – my husband, my mom, and our son.

At that time, me and my husband were in our forties; and as one could imagine, we had a very hard time trying to accommodate to the new circumstances and build a new life in the country of our dreams.

To start with, we had a serious challenge with communication. Even though we were able to read English articles needed in our job in Russia, we could not understand other people, and other people could not understand us. So, our first step was to enroll into an ESL program to learn English. And here we were very lucky to meet Igor's wife Olga, who introduced us to Igor and his parents.

Since that day at the end of 1994, Dvorskiys become our best friends, and Igor, specifically, become a very special person for us. He was also a newcomer, fighting the same challenges... He had no money or connections, but he has had a big heart.

Our first steps in LA were very painful and brought us a lot of frustration. And it was Igor, who gave us a hand on each our step. Not only advices, which were precious, but also a real help, like bringing us to a dealer to find our first (and of cause, used) car; checking for us car 's conditions, and finally driving our new car from the previous owner to our apartment house (as unexperienced drivers, we were afraid of driving long distance).

Being close friends with Igor's parents, we have been witnessing the outstanding relationship inside the Dvorskiy family. Igor impressed us by his exceptional devotion to his parents and his wife. Later, their tween daughters were born, and Igor shown himself as a passionate dad. The family continued to grow with the birth of their son, which brought new challenges. But for Igor, in any circumstances, the family needs always came first. He has been working very hard to secure a decent life for his kids. When he and his wife bought a house, there were not enough rooms to place each kid into a separate room. So, Igor with help of his wife and friends, rebuilt the house by his own hands to give each family member needed privacy.

With the time, as his parents 'medical conditions have deteriorated, they started to depend on Igor's help more and more, while three kids still needed a lot of attention. Now every Igor's minute counted... But he still managed to support everybody around him. The only person who he did not think about was Igor himself...

Just to summarize – I know Igor for more than 27 years; and all that time he has been displaying an exceptional personality, high ethical standards and integrity.

Olga Belchenko, Ph.D.



02/27/2022

Honorable Indira Talwani

United States District Judge

John Joseph Moakley U.S Courthouse

1 Courthouse Way, Suite 2300

Boston, Massachusetts 02210

We, Yiri Maslak and Catherine Kamenir, are both RNs and have worked in the medical field for over 25 years. We would like to take this opportunity to express a true and honest opinion about our friend, Igor Dvorsky.

We have known Igor for about 25 years, we came from the same country and the same city, however only had our roads crossed here in Los Angeles, California. Igor was introduced to us by a mutual friend and we instantly became good pals. Right from the beginning he was easy to talk to and yet very intelligent, he always has been a honest and genuine. Later, both of our kids went to WHCP school where he worked as a principal. We vividly remember when we had a hard time with our teenage son, Igor would always try to stand by our kid in the very calm manner and was always able to find good things to tell us about our difficult teenager, that would instantly make us feel better and hopeful. We truly appreciate his support and ability to see through a difficult personality, he is certainly superb at his job. Our son is now a wonderful young man, he has chosen a major in Anthropology at the University of California Santa Cruz and works at the Hummer Museum. We can't be more proud of his achievements. A big part of his success was him attending WHCP and particularly, the support of Igor Dvorsky in the academic thrive and development of our son.

Not only did get to experience Igor's professional quality as a principal at WHCP school we had an opportunity to see him working with elderly people in the health care field. He was always conscientious and diligent about doing his job, and provided care to many people. In the health care field it's imperative to have reliable coworkers and Igor was definitely a great asset to our team. He never complained no matter how hard the job was and took pride in what he did.

In conclusion, we would like to state that Igor Dvorsky is a great person, friend, and coworker.

Sincerely,
Kate Kamenir, Yiri Maslak

Peter and Anna Oyrek

2/27/2022

Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

My husband, Peter Oyrek, and I, Anna Oyrek, moved to America from Ukraine in June 1994. Soon after, we began to take English classes at a learning center. This is where we met and befriended Igor Dvorskiy. We have met many people from our background in the 28 years we have lived in the United States but Igor and his family have shown to be some of the greatest people we have had the pleasure of meeting.

Igor is a very honorable and trustworthy individual with great character. From the moment we met, he always helped our family in any way he could. In the beginning, he was a quicker learner of the English language than us and he assimilated into American culture faster than us. Because of this, he helped our family in dealing with any situation that required us to deal with other agencies from bills, banks, healthcare, etc. The list is exhausting and never ending but Igor happily helped us through it all. In many cases, Igor was able to help us in making important family decisions. We greatly valued his opinion and gladly listened to his advice.

Our friendship was not only limited to how we could help each other. We built a great friendship throughout the years. We celebrated many Jewish holidays together and spent time together frequently. We went on many family vacations together both domestically and internationally. We couldn't wait for the next adventure together.

Sincerely,

Peter Oyrek



02-27-22

Anna Oyrek



02/27/22

Paul Oyrek
5330 Lindley Ave Unit 204
Encino, CA 91316

2/28/2022

Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

My family and I moved to America from Ukraine in June 1994 when I was about 5.5 years old. My earliest memories of life in the United States included Igor Dvorskiy and his family. My parents became friends with the Dvorskiy family shortly after we arrived in the United States. This friendship is still going strong to this very day.

I always remembered Igor as being a good and honest person who cared for the people around him and did anything he could to help his friends and family. When I was young, he would always stop by our place to say hello when he was in the neighborhood. Our families celebrated many Jewish holidays together and went on several vacations together. I also recall he was a tremendous help to my parents. They didn't speak/understand English as well as he did, so he helped out whenever they needed any assistance in dealing with other companies or needing to go to the bank together to put everything in order as an example. Igor even gave his advice whenever it was asked for. His opinion was greatly valued because he was such an amazing friend to our family; always helping in any way he could.

Igor was even able to help me and my studies when I needed it. I was preparing for my college entrance exams but I was struggling with the English sections of the exams. I went through multiple tutors with no luck. Igor took time out of his busy schedule and organized tutoring for me to help me prepare for the exam. Igor's help led me to the right tutor that was able to relate to me and push me in the right direction. With this help, I was able to achieve a high score in the English section of the exam which allowed me to get into the University of California San Diego, which was my dream school.

Igor has been such a wonderful friend to me and my family. He has improved our lives with the love, care, and support he has shown us the past 28 years. I hope we were able to reciprocate even a fraction of what he has provided for my family.

Sincerely,

Paul Oyrek



2/28/22

March 27, 2022

Oleksandr and Anastasia Storozhuk

[REDACTED]
Canada

Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

Your Honor,

We are writing to you regarding Igor Dvorskiy.

We first met Igor in 2006. Oleksandr, originally from Ukraine, was working at the Embassy of Ukraine to the USA, in Washington, DC. We were a newly-wed couple, who decided to spend our honeymoon in some western US cities, including Los Angeles. We did not know anybody in Los Angeles at that time and were looking for someone who can show us around. Oleksandr's brother knew Igor from Kyiv, Ukraine and recommended us to contact him with potential recommendations of where to stay and what to do.

Oleksandr called Igor. Igor met us at the airport, took us to their house, provided us with the room, and drove us around. We were welcomed into his wonderful family, his wife and three beautiful children. Even with his hard work at the school, where his older daughters were studying at the time as well, he would find time to spend so much time with us showing us sightseeings. We felt right at home. The experience was amazing.

At that time, he showed us the school as well, we spoke to the teachers. The school was small and family-like.

After that in 2007, we moved to the west coast to San-Francisco, where Oleksandr was working as a Consul for Economic Affairs at the Consulate General of Ukraine, we would meet on multiple occasions and spent wonderful time together with Igor and his family.

We now reside in Canada. In 2015, Igor and his family came to Niagara Falls where we met again and we spent time there. It was an enormous pleasure to see the kids all grown up after so many years.

We can only characterize Igor as an extremely helpful, generous, open-hearted person, who would always try to help and never ask anything in return. He is the most loving husband and

amazing father. He would teach his kids to speak their native language, so they would have a link to his country of origin.

It is our honor to have wonderful people like Igor and his family to be in our life, and we can call them our true friends.



Oleksandr Storozhuk



Anastasia Storozhuk

February 26, 2022

Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

Re: Igor Dvorskiy Character Letter

Dear Judge Talwani:

My name is Larissa Gotguelf. I am a management and financial restructuring advisor with over twenty years of experience advising companies, borrowers, lenders, and creditors in complex transactions and business restructuring cases. I am a second cousin of Igor Dvorskiy.

I have known Igor for over thirty years and first met him back in the USSR as a teenager when he came to visit Moscow (where I lived with my family) from Kyiv where Igor lived at the time. We then reunited again several years later in Los Angeles as I moved there after finishing my MBA degree in the U.S.

Igor has always been a very welcoming and warm person, ready to lend a hand whenever anybody needed help. He is an ultimate family man who cares deeply about his wife and three children and has worked tirelessly to take care of his family. Igor and his children share a very strong and special bond as Igor has dedicated his whole life to making sure that the kids are healthy, hard-working, and have opportunities to realize their dreams. Being a first-generation immigrant myself, I know how difficult it can be at times to persevere while still trying to fit in in a new country, and Igor has had the strength and determination to do it.

Igor is the only child and primary supporter of his elderly parents who are in their eighties. He helps them with their daily activities and errands, (Igor's mother has severe essential tremor), health appointments and hospitalizations, and is always there to cheer them up.

Igor is truly the rock for his entire family, young and old, who love him and rely greatly on him.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Gotguelf', with a stylized, cursive script.

Larissa Gotguelf

Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

Dear Honorable Indira Talwani,

I'm a mother, community organizer and educator. I'm writing today to share my experiences over a decade with Igor Dvorskiy. We actually met when I was in an accident and he pulled over to take care of me and my family. He stayed with us for hours until we got help. This might seem anecdotal but I didn't have a cell phone at the time and am not sure what would happen if he hadn't got involved. In our society, most people just drive by those in need or struggling. I find it exceptional that Igor stopped to help a stranger.

This kind man in general is the most caring, devoted, attentive son & father. His 3 beautiful children all idolize him and depend on him to be a source of inspiration and support. He does everything for his elderly parents from taking them to doctor appointments to installing their appliances; at that age our parents require a great deal of assistance and will require only more with time. Igor sacrifices for his family graciously, constantly with a positive disposition and a smile.


In the current chaos of war between Russia and Ukraine, Igor is working tirelessly to help women and especially child refugees get to safety. At an incredibly difficult time, he is a beacon of hope and resources in his community. I have never seen him decline a call or request for aid, no matter the day or hour of the week.

I am myself Jewish and from Ukraine. Our people faced immense persecution. The slur "kike" was commonplace, as well as violence towards our people. That's why it is so unique and miraculous that Igor emerged from such a traumatic past into a life of giving and altruism. We need more Igors in this world, then it would truly be a better place.

As far as the matter at hand, it is my belief that his good-willed nature is actually what led to bad faith

actors taking advantage. It would be an injustice and harmful to the community to hold him accountable for the criminal behavior of other privileged actors. This event has already taken a huge toll on his family and him. I have watched these last years destroy his life and peace. Yet, he's still always warm and helpful. Igor has already suffered greatly as a consequence. To pursue further punitive damage to his life will hurt everyone around him in an inexplicable and inhumane way. I'm certain if he's allowed to put this all behind him, he will spend his life serving his family and community. And I hope that our justice system can reflect this fair outcome.

Thank you,



Zoya Shukhman

3/23/22

EXHIBIT B

EXHIBIT B

Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

Your honor,

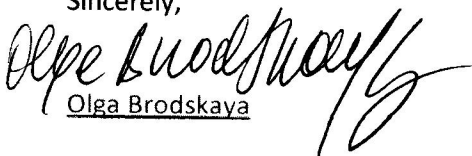
My name is Olga Brodskaya and I am the Owner of the Shapira and Stein Home Health Care Agency, I am a Registered Nurse and the Director of Patient Care Services. I have known Igor for at least 26 years, we met thru our mutual friend when I came to apply to my first job as an RN. Igor was applying for the Home Health Aide position. We worked together for a while, frequently sharing patients. Igor's responsibilities included helping homebound patients with personal hygiene and activities of daily living, which really takes a special kind of personality, character, and strength to perform the task. His patients were always happy and when returned to service were always requesting Igor. He had his ways with all kinds of patients: grumpy, picky, really ill, bedbound... Igor came a long way before establishing WHCP school. He worked his way thru many different occupations except the above-mentioned home health aide job, Igor also worked as a waiter, salesperson, QA – one thing was common though, he always worked really hard to support his family and to integrate into American society.


Shortly after we met I got introduced to Igor's wife and both of them became our family friends. We have spent a lot of time together including overnight trips and vacations so I think I know Igor pretty well. When I think about Igor's personality first thing that comes to my mind is that he is a really caring person. And really patient. He is always the one who takes care of everybody: his kids, his wife, his parents, his mother-in-law(!), his friends, and students. It's important for Igor to make sure that everyone is happy. I should mention separately Igor's dedication to his WHCP students, he calls all of them "Our kids" and they love him back. I have two kids who went to WHCP school, my son graduated and now is in college. My daughter is still a student there. Both of them love and appreciate Igor, he manages to be strict about academic staff (no slacking allowed), but also super kind and understanding when it comes to solving any other issue. I never heard Igor raising his voice. My oldest daughter worked at WHCP school while in college and noted the warm environment that Igor created between employees. My husband considers Igor one of his best friends and knows if something happens Igor would be the one to offer help among the first. The perfect example would be the current war in Ukraine situation, Igor knows I have family there and he was the first to reach out to check if we need any help and support my family.

I have been many times to Igor and Olga's home and they are the most wonderful hosts. Their 3 kid's characters, manners, and social involvement are the best proof of a good upbringing with strong family values and morals preached in this family. Igor is a very loving son and caring son-in-law. He is the one who handles all the medical appointments for their elderly(even mother-in-law). His family is really blessed to have him.

So this is a very short description of Igor's larger-than-life personality. If you have any further questions, please feel free to contact us at (213)716-3394 Olga Brodskaya or (213)300-0042 Dmitriy Brodskiy(my husband).

Sincerely,


Olga Brodskaya


Dmitriy Brodskiy

Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

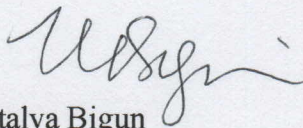
March 1, 2022

My name is Natalya Bigun. I work as a registered nurse at Mountainview Adult Day Health Care Center in Los Angeles, California. I've known Igor Dvorsky for the past 25 years. We first met in 1995 while working in a Home Care Agency taking care of the same patients. Igor was working as a Home health aide while putting himself and his wife through school. I know Igor as responsible, dependable, honest, and courteous. While working with Igor as his supervising nurse, I have had a chance to witness many aspects of Igor's personality and work ethic, all of which are extremely impressive. He was always punctual, caring and going out his way to provide excellent patients' care in his scope of practice.

In 2000 when Igor's twin girls were born, I happened to work at NICU of Cedar Sinai Medical Center, where the girls spent the first few months of their life. Igor was visiting his girls several times per day, eagerly learning how to take care of them with lots of love and patience. Over the years we became good friends, having kids the same age, we were able to see each other more often. Igor is a caring, supporting and loving father of 3 beautiful children. Igor is a person of good moral character, who cares about people around him and makes sure he always strives to do the right things in all situations. In addition, I know Igor as a great son, who takes time caring for his elderly parents on a daily basis.

I sincerely believe that Igor is an honorable individual, a valuable member of our community, good human being and a loyal friend.

Sincerely,

A handwritten signature in cursive script, appearing to read 'N. Bigun', written in dark ink.

Natalya Bigun

Nina Tregub
1230 N. Sweetzer Ave. #116
West Hollywood, CA 90069

March 4, 2022

Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, MA 02210

RE: Igor Dvorskiy

Dear Judge Talwani,

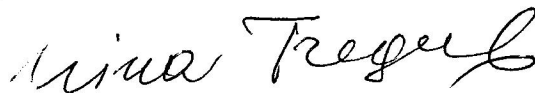
I am Nina Tregub, currently in retirement, after a life-time career in finance and accounting.

I met Igor Dvorskiy in 1995, under personally difficult circumstances. At that time my mother, Tsyliya Laznik, was living with the aftermath of a massive stroke she suffered some years before, and in deteriorating health. Mr. Dvorskiy was assigned to provide home care services by Home Health Care where he was employed as Nurse Assistant. He provided home assistance to my mother from 1995 to 1998. During that time I came to rely and count on Igor as someone who would respond with kindness and enthusiasm. I frequently had to call on his help outside of his assigned shifts, and he would always accommodate me and provide required assistance. Even after all these years I remain grateful and appreciative of his kindness and responsiveness beyond his professional responsibilities.

I believe this attitude toward people is in Igor Dvorskiy's nature. I became friends with his parents and over the years saw his attentiveness and giving nature toward them. His parents suffer from serious chronic health conditions and I know first hand that he provides daily assistance and care that enables them to lead full lives.

Thank you for your attention and consideration,

Sincerely,

A handwritten signature in black ink that reads "Nina Tregub". The signature is written in a cursive, flowing style.

Nina Tregub

To: Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

My name is Oleg Skiba.

I met Igor Dvorskiy in 1998 when I was working for Postal Innovation Company in Camarillo California. My former position in the company was Network Administrator / QA tester. At the time Igor was applying for QA Tester position for the company I was one of the people who conducting the interview. I liked his resume and personal qualities so we offered him a position. We work together for a few years and Igor exceeded my expectation on professional as well as on personal level. When he left the company and later we needed QA person again we never looked for another person. We just offered him position again because of his past performance with the company. He always responded for business needs without hesitation, never left work without finishing assignment, always been exemplary employee.

On a personal level we became very good friends. Even after he left the company for another position we continued our friendship. We often had family dinners and other events together. His wife Olga became a God Mother for my son. He is helping me any time I needed any help or advice and I can always rely on his friendship. I know from our relationship that when he was back in Ukraine, he was one of the first responders In Chernobyl Disaster and that takes a Man of Character to do work in areas contaminated with radiation. I'm very proud to have Igor as my friend!

Thank You

Oleg Skiba

A handwritten signature in black ink, appearing to read "Oleg Skiba", with a long horizontal line extending to the right.

4/4/2022

Dmitry Primachenko
5012 Queen Victoria Rd
Woodland Hills, CA 91364
03/15/2022

Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

Dear Honorable Indira Talwani:

I have known Mr. Igor Dvorskiy and his parents for over 25 years. Igor and I met very shortly after we had immigrated to the United States. I have witnessed all the hard work Igor and his wife have done as new immigrants and have personally worked with Igor on some of those jobs / projects. At that time, I got to know Mr. Dvorskiy as a committed hard working individual. As we were evolving through further education and training, Mr. Dvorskiy and I were working in the field of computer science. That allowed me to get to know him from the professional angle as well.

Igor's parents worked with my son on his general development, language and math skills since he was a toddler. Later, my son was attending Dvorskiy Alternative School (later renamed to West Hollywood Community Prep) during middle school for four years from 5th to 8th grade.

While my son was attending the school, for about a year I was volunteering as a computer science teacher. During that time I got to see how Mr. Dvorskiy was handling communication and situations with the children as well as the teaching staff from within.

In summary, in over 25 years of personally knowing Mr. Dvorskiy, I came to know him as a hard working individual, good and dependable professional, caring and supporting son, loving and devoted father, and responsible and compassionate employer.

Sincerely,

A handwritten signature in black ink, appearing to be 'Dmitry Primachenko', written over a large, loopy flourish that extends across the bottom of the signature area.

Dmitry Primachenko

EXHIBIT C

EXHIBIT C

To: The Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

From: Alex Glazenberg, M.A.
English Instructor, West Hollywood College
Preparatory School, West Hollywood, Ca.

Your Honor,

I am and have been a teacher at West Hollywood College Prep School since 2008. Until 2019, Igor Dvorskiy had been my boss in my capacity as teacher. During those many years, I interacted daily with Igor and got to know him as a supervisor and a person. I attest to the court that, based on my knowledge, Igor is a person of excellent character and a fine member of the community.

Igor is a caring, conscientious, fastidious, and scrupulous person. As a boss, before the unfortunate incident that is before the court, he dedicated his life to his students, their personal and academic success; to his staff, the development of their professionalism, their well-being, and happiness in their jobs; to his family, the education of his three children—all of whom I had instructed since childhood before they graduated and went off to college—and to his elderly parents whom he loves and supports. Igor demonstrated genuine passion as an educator and member of the community. His primary concern was always the progress of the students, their personal and civic development, and their safety. He built a good relationship between his school and the West Hollywood community by participating in community events such as toy drives during the holidays, book fair events, and fundraising bake sales. All of the aforementioned was done for the sake of his students and staff.

Over the years, I experienced periodic financial hardship between paychecks. Igor wrote me personal checks as advances on my pay to ease my financial worries. On many occasions he stayed after school to offer me this kindness. During the early days of the covid closures, he made sure that I was financially secure by providing tutoring work for me. Moreover, Igor has shown the same kindness to his students. He was always eager to listen to their personal and academic problems and to provide extra tutoring for students who had academic difficulties. Often, this was done at no extra tuition fee.

I know Igor to be a kind, honest, caring, and professional person. Igor has overcome the difficulties of immigration and adjustment to a new culture and language to become a fine citizen. I truly believe that he is an asset to the community and to anyone who knows him.

Sincerely,

Alex Glazenberg

A handwritten signature in blue ink, appearing to read "Alex Glazenberg", with a long horizontal flourish extending to the right.

To: The Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

From: Volodymyr Pustovoytov
Math Instructor
West Hollywood College Preparatory School
West Hollywoo, Ca.

Your Honor,

I am Volodymyr Pustovoytov. I am seventy-two years old, and for twenty-two years I have worked with and known Igor Dvorskiy at West Hollywood College Preparatory School in West Hollywood, California. During this time, Igor has been my colleague and has become my good friend. In 2020 I became seriously ill with Covid 19. Igor during my illness provided me with invaluable services ranging from pharmacy trips on my behalf to personal grocery deliveries to my home. If it had not been for Igor's selfless kindness, my illness would have been compounded by grave consequences due to unavailability for me of medication and food.

As the director of West Hollywood College Prep School, Igor has proven himself to be an honest, conscientious, and good-willed school administrator. Igor's primary concern as school director has always been the well-being of his students, their academic progress, emotional and physical health, their social development, and their development as respectful, productive members of the community. Igor has always devoted the same effort to his staff and to the students' parents. Igor has always been eager to provide any help in a variety of situations and salutary advice to students in their times of need.

During Igor's tenure as school director, WHCP has successfully undergone several accreditations and experienced school growth due to his efforts. Moreover, Igor has always been actively involved in his students' post-high school academic careers, personally ensuring their admission to college.

Igor is erudite, responsive, and highly knowledgeable in his academic field. I am proud to call Igor my good friend.

Sincerely,
Volodymyr Pustovoytov

A handwritten signature in black ink, appearing to read 'V. Pustovoytov', with a long horizontal stroke extending to the right.

Honorable Indria Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

I am Aleksandra Rozenberg, a teacher of English in Elementary school. I was working at West Hollywood Community prep for many years. Igor Dvorskiy was a Director of this school from the very beginning of its opening. Being a good boss, he earns respect from the teachers of his school by doing the right thing such as Praising, Caring for stuff, Listening attentively, Having Trust. The main feature of his character is Kindness. Too often we saw the power of a touch, a smile, a kind word, a listening ear, an honest compliment, or the smallest act of caring.

Igor knows how to use tact deciding which informations is public and which should be private. Flexible work schedules were always acceptable and was asking about the teachers' hobbies, interests and family. All these actions help to increase job satisfactions and show the teachers that their director, who is more than a friend, cares about them. This is the most important in our life.

Igor has a very nice family, being the best father to his kids, a loving husband and a faithful son to his elderly parents. He grew up in the family of teachers and being Jewish in the USSR, he faced a lot of difficulties but came across all of them. He is friendly to everyone.

02/23/22

A handwritten signature in black ink, appearing to be 'Igor Dvorskiy', written over the date.

Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

March 1, 2022

Dear Honorable Judge Talwani,

I am a current pre-school teacher. I have known and worked with Igor Dvorskiy since September 2003 - almost 20 years. Much has happened over these many years, but throughout this time, I have known Igor to be a good and true person.

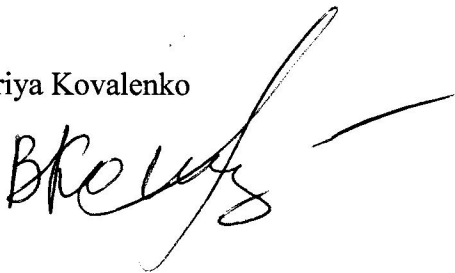
Igor is a loyal and considerate person who is always there when someone needs him. He listens and is always very understanding. Igor deeply cares for his family, his friends, and his colleagues and is always there to help and support them. I experienced his kindness and support firsthand when I lost my mother last year. I also witnessed his compassion for a fellow colleague who was gravely ill and could not come into work.

Igor is also a person who can be depended on. I know him to be a good husband, son and father. His children grew up right before my eyes. I saw his interactions with his children and how he takes care of them over the many years. They share a close bond. He is very loving, understanding, and caring with them. The children have grown up beautifully, reflecting their father's love and care. Igor is also a good son. His parents mean a great deal to him. He is very thoughtful, attentive, and caring with them.

In my experience, Igor has always been and continues to be a good person.

Sincerely,

Viktoriya Kovalenko

A handwritten signature in black ink, appearing to read 'Viktoriya Kovalenko', with a long horizontal flourish extending to the right.

March 4, 2022

Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S., Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

Re: Igor Dvorskiy

Your Honor:

My name is Jina Mukhuradze, and I am currently the director of the elementary school (K-6) section at West Hollywood College Preparatory School. It is with great pleasure that I write this letter of support for Igor Dvorskiy.

I have known Igor for seventeen years, and can say with a high degree of confidence that he, foundationally, is a very good and empathetic person. He has always been a compassionate, respectful, responsible, and caring individual. This is not only based upon my experience with Igor as an educator, where he is respected and adored by the hundreds of students who have graced the hallways of our school over many years, but also as but also as a friend who always provided guidance and advocacy on my behalf during some of the most difficult times that my family and I have faced.

In 2005 when I first came to work as a teacher at the West Hollywood College Preparatory School, I fell in love with the job, its wonderful students and the school's strong academics, so wanted my young son to attend but knew that I could not afford tuition as a low-income single mother. Igor welcomed my son to the school and waived all tuition costs—during the eleven years that my son was studying at the school, we had comfort in knowing that I would be able to provide my son with a quality educational experience while also being able to put food on our table.

Additionally, when I experienced extreme hardship during the time of my divorce, Igor assisted me with both morally and with sustenance so that I would no longer have to have to rely upon a local food bank. Because of his kindness, I was able to overcome one of the most difficult times in my life and move forward with dignity.

Thank you for this opportunity to share a couple of many the examples of the good that Igor Dvorskiy has done for me and his students over his many years of service. Again, I can say with all assurance that he is a responsible and kind person of good moral character.

Yours truly,
Jina Mukhuradze



Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

Your Honor,

I am currently a teacher at the West Hollywood College Preparatory School. I have been employed by the school since 2005 and have known and worked with Igor Dvorskiy for many years.

I have known Igor to be a very intelligent, calm, and giving person. He was always willing to give a helping hand and always understood all the teachers' and staff's problems. Igor is a caring son and loving father to his three children, all of them I had taught throughout my time here. My own son attended the school for a few years and Igor was able to give us a generous discount.

Throughout my many years of knowing Igor he has always been considerate and good natured.

Sincerely,

Elina Karavaeva

March 7, 2022

A handwritten signature in black ink, appearing to read 'Elina Karavaeva', with a long horizontal flourish extending to the right.

03/08/2022

To:

Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

I got to know Igor around 2004, when I was just starting out in my career and was doing ad hoc projects for the school him and his mom built. My entire experience with Igor (resent and in the past) was nothing but great, specifically he would go out of his way to provide recommendations on how to grow my career and which steps to take to advance my knowledge. Also, both on and off work, he was always as an easy going and pleasure to work with.

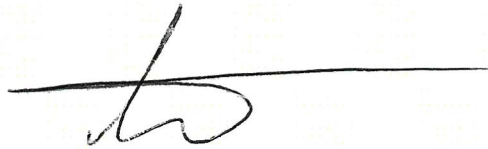
I always saw Igor as a passionate individual with an excellent work ethic. His technical knowledge, hands on experience, drive to succeed, and positive attitude made him a true asset within my network of friends. In my interactions with him he has always shown an enthusiasm, dedication consistently and consistency.

Thus, I wanted to write this letter to describe my expertise with Igor and what he has done for me personally.

Sincerely,

Art Fatkhiev

Plant Controller



Glidewell Laboratories

18651 Von Karman Blvd.

Irvine, CA 92612

323-229-5664

Tatiana Horsley



March 11, 2022

Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

Your Honor,

I am writing on behalf of Igor Dvorskiy. I have been known Mr. Dvorskiy for six years since I began working at West Hollywood College Preparatory School as a teacher. We are co-workers in West Hollywood College Preparatory School. In this time he is known for being a reliable member of the community. It is for this reason I am happy to write a letter of reference for Mr. Dvorskiy.

Igor Dvorskiy has always been an upright character in the community. I respect Mr. Dvorskiy as he has always been a person, who is very devoted to the school, the students and the staff, working in it. Mr. Dvorskiy has always been an integral part of the school life by providing the support and guidance as effective manager.

Mr.Dvorskiy has always been very attentive to the teachers' needs and a demand, providing the teaching proses with all that is necessary and required for successful teaching and learning.

Mr.Dvorskiy has formed a friendly bond with the school staff that an effective manager should form. He is very caring, polite and attentive to every student and teacher at school.

It is my sincere hope the court takes this letter into consideration. I still believe Igor Dvorskiy to be an honorable individual, a valuable member of our community, and a good human being.

Sincerely,

Tatiana Horsley.

A handwritten signature in black ink that reads "T Horsley". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Honorable Indira Talwani
United States District Judge
John Joseph Moakley L.L.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210
March 11, 2022

Dear Honorable Judge Talwani, my name is Larisa Mints and I work as a teacher assistant at Dvorsky School since March 2007. I know Igor Dvorsky as a calm, balanced, decent, kind and attentive person, who always ready to help anyone in need of help. As an employee, I have been reaching out to Mr.Dvorsky frequently with my family issues. When my daughter was pregnant and was on bedrest, Mr.Dvorsky let me take time off for a month to take care of my daughter. When two of my grandkids were attending Dvorsky school for two years, Mr. Dvorsky decreased the tuition by 50% because I was his employee. When my sister passed away in San Francisco, Mr. Dvorsky let me spend the whole week with my family and didn't limit my time to just three days. Whenever there is any conflict, Mr. Dvorsky resolves it quietly and professionally.

Igor Dvorsky is a good family man. I watched his children grow up. I know him as a good, loving father and his kids love him back. Mr. Dvorsky is a good human being, good family man and a good school director.

Thank you,

Larisa Mints
March 11, 2022



Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

March 29, 2022

Dear Honorable Judge Talwani,

I have been a music teacher for over 20 years, most of which I have worked with Igor Dvorskiy. He has been a kind and generous boss, and always accommodating to any personal emergencies that I or any of my colleagues have had. My husband and father both had different health scares which resulted in me altering my work schedule - during both periods of time, Igor was very supportive and understanding. He made sure I had appropriate substitutes, ensured our students continued to receive the best education, and did not fall behind due to the changes.

Outside of the work environment, I know Igor is a great father to his children. They have a close relationship and he has raised them to grow up to be very responsible young adults. Igor has always been a great person and a pleasure to work with.

Sincerely,

Naira Nazaryan

A handwritten signature in black ink, appearing to read 'Nazaryan', with a large, sweeping flourish above the name.

**Honorable Indira Talwani United States District Judge
John Joseph Moakley U.S. Courthouse 1
Courthouse Way, Suite 2300
Boston, Massachusetts 02210 2.**

Your Honor,

My name is Inna Fatkhieva. I have worked at Dvorskaya Alternative School (now West Hollywood College Preparatory) school since 2003.

I started as Math and Physics teacher, and later, approximately since 2005, as a teacher and assistant principal.

Correspondantly, I know Igor Dvorskiy almost 20 years, not only as a coworker and school administrator, but as a person too.

Igor is a very kind, fair and equitable person for each member of his big family, each his coworker and each student of the school.

He knows how to speak with different types of people to be convincing, reasonable and conclusive. He is also very compassion and sympathetic person. For example, when my Father was very sick and needed a lot of my attention and help, the school administration reorganized my schedule such a way I could work and pay attention to my father.

I remember this situation and appreciate the help of school administration and Igor personally.

**Sincerely,
Inna Fatkhieva**



04/10/2022

Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

Your Honor,

I'm Mikhail Eykher. I met Igor Dvorsky in 2003. I worked as a professor of Mathematics at Los Angeles Citrus College and Los Angeles Mission College at that time. Igor Dvorskiy and his mother, Elina Dvorskaya, opened a tutoring center where I applied for a part-time position. At that time I learned that teachers hired by Igor were highly qualified; in fact, the majorities were professors from the former USSR. I witnessed the dedication with which Igor selected teachers to make sure there was an individual fit between teachers and students. Igor made sure that teachers were not only very knowledgeable but had outstanding personal qualities. The tutoring center had an excellent reputation in the community. During that time Igor worked very hard to convert the tutoring center into a fully licensed school that included elementary, middle, and high school.

Igor worked tirelessly with the administration of City Hall, along with contractors and administrators, while working on school curriculum and selecting outstanding teachers. I witnessed Igor's hard work as well as his strong work ethic while solving difficult tasks. The school has been fully functioning since 2002. I have been working part-time during all of those years, and since 2018, when I semi-retired, I have been teaching only at West Hollywood College Preparatory School. During all these years, I witnessed how Igor has upheld the values and goals of the school. He is very involved in students' lives and makes sure each student's needs are met. Every school has its share of difficult students. Igor has always tried to shelter his students from bad influences while helping them to make the right choices.

In spite of the fact that at times the school was struggling financially, Igor often showed kindness and understanding by giving significant discounts to students from low-income families. I personally witnessed Igor's compassion when he helped a teacher diagnosed with a devastating illness to find best specialists in that field.

Sincerely,

Mikhail Eykher



04.20.2022



WEST HOLLYWOOD COLLEGE
PREPARATORY SCHOOL

1317 N. Crescent Heights Blvd., West Hollywood, CA 90046

Tel: (323) 822-7900

Tel/Fax: (323) 822-7999

E-Mail: info@westhollywoodschool.com

www.westhollywoodschool.com

To: The Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

From: The staff of West Hollywood College Preparatory School

Your Honor,

We faculty of West Hollywood College Prep School collectively attest to Igor Dvorskiy's honorable character and conduct. All of us who currently work at WHCPS had interacted daily with Igor when he was our supervisor at the school. We can state honestly and emphatically that Igor had, throughout his tenure, evinced nothing but kindness, care, and concern for his staff, faculty, and students. He was always concerned about our well-being, both within our jobs and outside them. For instance, he always ensured that each employee had work hours commensurate with individual financial need, and he would frequently enquire about our monetary circumstances, providing us with extra hours when we needed them. Igor strove to make our school more than just a workplace; he created a family-like environment for his staff. Not many employers take the time and effort as Igor did to provide for the happiness of their employees. Moreover, Igor was always scrupulously honest in his dealings with us. For example, some of us would occasionally by oversight under-report hours worked on our time-sheets. Igor always made sure to inform us about this and pay us for the hours we had neglected to report.

Igor always showed the same concern for the students of WHCPS. He amicably resolved conflicts between students and faculty and between faculty and parents, when they occurred. Igor himself counseled students when they experienced academic or personal difficulties. He was motivated not by monetary concerns but by simple kindness. For example, Igor frequently gave after-school program jobs to former students of WHCPS so that they could gain work experience and income. He was under no further obligation to these graduates, nor could he have expected to receive any more tuition from them; he provided for them simply because he cared about their lives after graduation. These examples are characteristic of Igor, and there are any more like it that cannot be enumerated here.

We sincerely attest that Igor is an upstanding, caring, and honest person. We are all happy to have had him in our lives. Thank you.

Sincerely,

Jina Mukhuradze
Childcare and School Age Children Director

EXHIBIT D

EXHIBIT D

Evgeny Tsimerinov
[REDACTED]
[REDACTED]

March 23, 2022

The Honorable Indira Talwani
Judge, U.S. District Court for the District of Massachusetts
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

Case No. 19-CR-10081-IT

Judge Talwani:

Re: Sentencing of Igor Dvorskiy

My name is Evgeny Tsimerinov. I previously served as Co-Director of Neurophysiology at Cedars-Sinai Medical Center in Los Angeles, and held appointments as Professor of Medicine and Neurology at the University of California, Los Angeles from 2006 to 2016. I am currently licensed to practice medicine as a physician in thirty-five states, and hold privileges in over 260+ hospitals. I am also an immigrant from the former Soviet Union, and know firsthand the challenges one faces when starting over from scratch and building a new life here in the United States.

I first met Igor Dvorskiy in 2008, when my son, Ilya, was admitted to Dvorsky College Preparatory School. My son, despite his excellent academic achievements, was a troubled kid and frequently demonstrated out-of-control behavior. He had been increasingly sliding down the wrong track and was likely headed for a bleak and difficult future without immediate intervention. From first introduction, Igor took personal responsibility and ownership over my son's behavior and attitude, and over the course of several years gave him firsthand mentorship and attention on a daily basis to ensure he was succeeding in fulfilling his potential. Igor stayed on top of his progress in his classes, held constant conferences with his teachers and with my wife and me, and counseled my son on a range of issues from the personal to professional. Igor served as an invaluable resource to my son, as a guide, a role model, as a friend, and was uniquely adept at managing all facets of his development in a way that only the most skilled and practiced educator would be able. Igor demonstrated a devotion that could only have arisen from a deep love, respect, and appreciation for the pupils under his charge. It was clear that he drew his greatest fulfillment from their achievements, and that he measured his success by theirs.

Thanks to Igor standing squarely behind my son at every turn, Ilya was able to graduate high school with one of the highest GPAs, and found himself accepted to virtually every university he applied to, from the Ivy League to every university in the University of California system. Ilya went on to graduate with honors, and is now working in a successful and fulfilling career while starting a new family with his wife. None would have been possible without Igor Dvorskiy.

Over the course of fifteen years, Igor and his entire family have become close personal friends of mine. Like Igor, his parents are highly educated, brilliant, hard-working people who have surmounted the incredible obstacle of building astonishing lives for themselves—not once, but twice—in two countries, two cultures, two languages. They devoted themselves to ensuring the best for their children and grandchildren, succeeded in doing so, and yet still continue to strive for their constant improvement. Igor, himself, fled oppression, persecution, and antisemitism in his homeland and, without letting it deter him, has spent his life in the service of others, making a marked difference in the lives of countless others, and has been personally responsible for the successes of so many. Igor has influenced, molded, and produced lawyers, doctors, teachers, numerous public servants that have gone on to provide immeasurable benefit to their communities. None of it would have been possible without Igor Dvorskiy.

Igor has raised two beautiful, amazing daughters, both of whom are smart, talented, kind, humble, and fantastic citizens of our world. They are generous, charitable, good-hearted, so well-behaved, and respectful of their parents and anyone they meet. I have watched them grow from children into adults, and am so excited to be witness to their continued accomplishments. I can attest that none of it would have been possible without their father, Igor Dvorskiy.

I have now mentioned multiple times the number of things which would not have been possible without Igor Dvorskiy. I can say, from the bottom of my heart, I have not expressed it in vain, I have not exaggerated, I have not written a word I did not believe wholeheartedly to be true. I know the good Igor has done, continues to do, and will do always, now and in the future. I, like so many others, have been touched personally by his decency, his integrity, his graciousness. Both my son and I will forever be grateful for our relationship with him.

I do not wish to excuse the solemn circumstances under which I write this character attestation. Like many of those closest to Igor, I was shocked, angered, and disappointed when I learned of what had transpired. However, I humbly ask that you consider that Igor has never discounted anyone for any mistake they have made, has never abandoned anyone he has come across, and has always sought to give his all in helping to turn around the life of anyone who required his assistance. No different from my son when he needed it most, I now stand squarely behind Igor and urge you to not discount the impact Igor has had, nor to allow it to be ignored because of a grave but momentary error in judgment. I can personally attest to the immense sadness and regret Igor has expressed over his actions, and I have no doubt he will bring every effort to bear to atone for them. I hold absolutely zero reservations for asking, yet again, that you remember the vast number of things which would never have been possible without Igor Dvorskiy, and the number of things yet to come in which he may have an impact, and that may be made possible thanks to the presence of Igor Dvorskiy.

Thank you for extending me the courtesy of your time in considering my plea. I am at the court's disposal should I be able to provide any further assistance in confirming the facts stated herein.

With deepest respect and sincerity,

A handwritten signature in dark ink, appearing to read "Evgeny Tsimerinov". The signature is fluid and cursive, with a small "to" written above the first few letters.

Evgeny Tsimerinov, MD, PhD, DABPN, FAAN, FACNS



Bennett & Ginzburg Attorneys at Law

9454 Wilshire Blvd., Suite 500
Beverly Hills, CA 90212
telephone: 323.935.0041
facsimile: 323.935.0071
www.bennettginzburg.com

Gwenn Albright
Legal Assistant

Roberta B. Bennett*
Olga B. Ginzburg

**Certified Family Law Specialist
Board of Legal Specialization
State Bar of California*

March 15, 2022

Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

Re: Igor Dvorskiy

Honorable Judge Talwani:

I wanted to take the time to write this letter on Mr. Dvorskiy's behalf. I am an active member of the CA bar and am a managing partner in a family law firm in Los Angeles, CA.

I have known Mr. Dvorskiy for over 10 years, as both of my sons attended the Dvorskaya Preparatory School since they were 20 months old. It is most certainly due to Mr. Dvorskiy's generosity that my sons were able to attend this school. At the time, both my husband and I were just getting started in our careers and could not afford to pay the full tuition for each child. We knew of the school through a number of friends and relatives whose children had attended it, and all of them found it to be exceptional both academically and socially. The school was, therefore, our first choice for our sons. Mr. Dvorskiy went out of his way to make sure that our family received the financial assistance we needed to be able to afford the school tuition.

I would see and interact with Mr. Dvorskiy at least 3-4 times per week, while dropping off and picking up my sons. I always found him to be hospitable, outgoing and, most importantly, caring. He truly cared about the children and made every effort to go out of his way to address any concerns us, parents, had.

Once my boys left the school due to our family relocating out of the area, Mr. Dvorskiy helped me make sure that the children's transition to the new school was as smooth as possible. He assisted me with gathering the necessary documents, as well as with any other requests or concerns I had.

I am happy to say that after my children left the Dvorskaya school, I remained in touch with Mr. Dvorskiy. Over the years that I have known him, Mr. Dvorskiy has shown himself to be a genuine, trustworthy and caring human being. I am forever grateful to him for making it possible for my sons to start their "schooling" at such a wonderful and nurturing place, which

Honorable Indira Talwani
March 15, 2022
Page 2

gave them the foundation needed to excel academically later on.

It is without any hesitation that I submit this letter on his behalf. If I may be of any further assistance, please do not hesitate to reach out to me.

Very truly yours,

BENNETT & GINZBURG



OLGA B. GINZBURG

OBG/jag

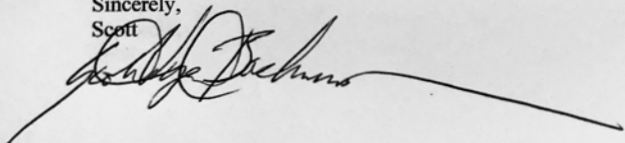
Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

Dear Honorable Judge Talwani,

My name is Scott Bachmann and I had my children enrolled at West Hollywood College Preparatory's Nursery and Pre-K from, I believe, 2014 to 2019. While they attended, I was also on the school board with Igor.

I do not know how to write this, I hope it all makes sense to you, the court. I really do still feel the shock of that day, but I have had some years now to process it. Do not I hold not lightly what Igor has pled guilty to, I am truly truly saddened. Yet, I find myself having to trust there was some greater good he was trying to accomplish. A blind altruistic vision, if you will, he somehow created in his head in order to maintain, no matter what, his mom's dream of a school vibrant and expanding. I say this not as an excuse, because there is none that can be given, but rather what seemed, looking back, a man whose heart overwhelmed his mind's moral compass. It is the only way it can make sense to me because all the good he did for the students at the school. Things were getting repaired, improved, better educational items were bought and even a new science table was somehow quickly afforded. For those five or so years I knew Igor, I can speak to this, whenever the school or its children needed something, Igor and the whole school tried to make it happen. It was tough but it always came through. He genuinely cared for each of the students and it reflected in how they interacted with him. The passion for a good education started from him, his mom and went onto all the staff and parents. My sons were well advanced, in math, science, dual language, music and art when they went on to attend public school in the Los Angeles Unified School District after leaving West Hollywood College Preparatory's Pre-K. I was blessed by this. As far as other students, there were children that could not afford to attend WHCP, but Igor made sure that they could still attend at a much much lower tuition. At Board Meetings he expressed the need to make sure all school's children got the very best in education, nutrition, and 3rd party activities, such as dance, robotics, yoga and karate (if I recall). It was his belief that for a child to be better in school all one must do is offer him or her love, kindness and structure. Education would follow. It was how he was with his own children too. On occasion he would tell me, dad to dad, to live every moment because it goes by so fast. All in all, he was a great father, and I would bet he still is. I would also bet that he still gets smiles from the kids at the school, where I trust he still works there. I would hope so because he can teach what is it to greatly fail, own life-altering mistakes, accept them and become a better soul for our society.

Sincerely,
Scott

A handwritten signature in black ink, appearing to read "Scott Bachmann", with a long horizontal flourish extending to the right.

From: Ada Belova



To: Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

To the Honorable Indira Talwani, my son was a student at Mr. Dvorskiy's school, West Hollywood College Prep, for over ten years. In that time, Mr. Dvorskiy's compassion and work ethic instilled an education in my son I couldn't have even imagined coming from any other school. The school Mr. Dvorskiy helped create and run was instrumental in creating a successful path in schooling for my son, to the point where he was able to graduate a year earlier than most high schoolers his age.

Throughout my son's growth, Mr. Dvorskiy was always accommodating with whatever needs my son needed. I have not had a car since before my son was in West Hollywood College Preparatory school, so whenever there was a field trip or important event my son needed to be at, Mr. Dvorskiy always made sure my son was able to get to whatever event was taking place, and did not have to miss out on a valuable experience. Whenever my son was struggling with his education, Mr. Dvorskiy always made sure to get my son in touch with the school's teachers and offer tutoring, which was incredibly important to my son's growth in school. This was also all offered to me and my son at no extra charge. He created a school full of some of the best teachers you could find and was extremely approachable and insistent on making sure the kids at school succeed in their education.

More importantly, three years ago, my son was diagnosed with Acute Lymphoblastic Leukemia, and shortly after, suffered a stroke due to an allergy to the chemotherapy (Pegaspargase) he was given. Mr. Dvorskiy was one of the first people to contact me to offer his help and well wishes upon hearing of my son's circumstances, not only that, but he even offered to help raise money for my son's medical bills through friends and family which greatly reduced the stress that time put on me and my son's shoulders.

He truly saw my son and his classmates as his family, and I truly hope that you can see him for the charitable and kind man that he is.

A handwritten signature in black ink that reads "A. Belova".

Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

Your Honor,

My name is Irina Kasyanova and I am a cosmetologist in the Hollywood beauty industry for approximately 30 years. As a struggling single mother in Los Angeles the decisions of parenthood did not come easy. Its only 20 years later today, I can proudly say that I made the right choices. It really came down to the amazing person Igor Dvorskiy is. The financial assistance he provided me for my daughter to stay in private school and become a great person and an extraordinary talented musician is something I can never repay him for. Your Honor I am just one of many success stories whose lives Igor touched and changed for the better. Igor is a very compassionate about helping people in our community and other communities as well. He is known for somebody who would take the shirt of his back for anybody in need. He is very humble and well respected among the families of West Hollywood. My daughter and Igor's daughters are very close friends and my Daughter spent many weekends at their house. Igor is an amazing father, husband and son. The impact of Igor's approach to education and enthusiasm at West Hollywood College Preparatory School will last not just for lives of today's families that work with him but also for generations to come.

Igor and I are approximately the same age and fought the struggles of emigrating from the former Soviet Union to the United States. The hardships were the same for all of us and with that, life taught us to help each other, and be kind to one another. Igor lives by that and is a pillar of our community. Igor and his family brought direction to our lives through West Hollywood College Preparatory School. Thanks to Igor many of these kids including mine grew up to be important people in society.


Sincerely,

Irina Kasyanova

A handwritten signature in cursive script, appearing to read 'Irina Kasyanova'.

Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

I am Madlena Narmania, owner of Narmania LLC (Mismady).
I am a parent of a student at West Hollywood Preparatory School. My child is in 9th grade, and we have been there since 3rd grade. My child was bullied at previous school, she was crying every day. She was saying that she wishes she was never born. That was coming from her 3rd grade teacher and classmates. My heart was ripped apart seeing my child in that struggle. I decided to change her school, after I realized that nothing good is waiting for her in that school. This school was first I googled, when I meet Igor Dvorskiy I said this is the school for us. From day one, my child have changed, she was smiling and happy. This school is the best what could happen to us. All this was managed by Igor. He is very responsible, smart, carrying, professional. Because of his management and system he created my child is happy! He helped us a lot, even though we are not a friends, he did more for us than our family members. We were robbed back in times, we had no money to pay for school. He never pushed on us for a payment, other school would have kicked us out already. We also got discounts from Igor, which I would have never imagine would be possible. But thanks to Igor my child is still in this school and will graduate in a few years. He got best stuff members and an amazing teachers. We really miss Igor. He was best principal I ever heard of or seen. I wish I was in this school when I was a kid. He never charged for after school program, and my child was coming home with already finished homework, so we could enjoy our family night without running around house to do the homework. For working class family it's a huge stress, helping a child to get to her homework, and English is not our first language so it's hard for us. But, huge thanks and respect to Igor Dvorskiy for ease our lives. He is the best! I can keep going about Igor , what an amazing person he is, but sadly my English is not that perfect so I can describe more what I have in my thoughts.

Madlena Narmania


Lana Silver
c/o Ancona Insurance Services
7787 W Sunset Blvd
Los Angeles CA 90046
Tel 323-654-2604,
Fax 323-654-2763
License # 0G97504
email: client@anconainsurance.com

Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

Re: Igor Dvorskiy

Your Honor,

My name is Lana Silver, and I am the owner of the Ancona Insurance Services, of West Hollywood, California. I have known Igor Dvorskiy since September of 2005, when my son, M [REDACTED] started his Kindergarten in West Hollywood College Preparatory School. Later on, in October 2006 Igor Dvorskiy has become one of my loyal insurance client for all his business and personal insurance policies and is continuously current with my agency on all his insurance needs.

Igor has very strong and reputable position in our Russian community, representing honesty and responsible for all the school activities, I never had any issues with him, he is been respected not only by the school staff, but by all the parents in the community.

He is a great son to his elderly parents, loving husband and father of three, showing them a great example of family values and respect toward others.

Some of the memories I have for Igor, is when the school was throwing a charitable dinner party, I was observing him giving the instruction to the staff, not to collect entrance admission tickets, basically letting us, the parents enter for free. By the end of the day, he donated all the gifts from the silent auction to the parents and staff. It was unforgettable experience, and Igor was the one who made it possible.

Sincerely,



Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

Support Letter for Igor Dvorskiy

I, Inna Zadykyan, am writing this letter to express my support for Igor Dvorskiy. I have known Mr Dvorskiy since 2013 when my children first started West Hollywood College Preparatory School where Mr Dvorskiy was a director. I have never had any doubt about Mr Dvorskiy's integrity and honesty.

I am currently self-employed, but my priority has always been my family. As a mother of three, my children's safety and well-being are my main concern. West Hollywood College Preparatory School met my needs and became a home for my two children for five years. I have never doubted the school faculty's professionalism and felt safe leaving my children under Mr Dvorskiy's watch. My children excelled at school and never complained about their school life or teachers.

Mr Dvorskiy was always understanding, supportive and ready to accommodate our needs. For example, when we were in a difficult financial situation, our requests for late payments were approved without any further questioning. We have never felt pressured by any school faculty or Mr Dvorskiy. Furthermore, as I recently moved to the United States, Mr Dvorskiy was always open to sharing some good advice and answering my questions about life in Los Angeles.

Mr Dvorskiy is a great person both inside and outside school. He is positive and cheerful and is a great support for our community and our children. He created a pleasant environment at school for our children to strive and grow as individuals. I am thankful for the years my children spent at West Hollywood College Preparatory School.

Sincerely,

Inna Zadykyan

A handwritten signature in blue ink, appearing to read 'Inna Zadykyan', with a long horizontal flourish extending to the right.

Honorable Indira Talwani

United States District Judge

John Joseph Moakley U.S. Courthouse

1 Courthouse Way, Suite 2300

Boston, Massachusetts 02210

Support letter for Igor Dvorskiy.

It is my pleasure to write a letter in support of Igor Dvorskiy. I have known Igor Dvorskiy since 2008. My children went to the West Hollywood College Preparatory School where Igor was the director. I remember the impression he left on me when we first met: open-minded, positive, intelligent, caring, and sincerely worried about his school and students. After conversing with him for just a day, I knew he was the perfect director and immediately enrolled my daughter in the kindergarten class. Even though we had to drive almost an hour just to get there everyday, I believe it was worth it. I always felt that the learning environment heavily reflects the qualities of the head of the school and this was the case in the West Hollywood College Preparatory School. Everyone in the school seemed to strive to be as forthright and cheery as Igor. Gradually, all my children started attending Igor's school and there hasn't been a day when I regretted that.

Over the past 14 years that I have known Igor, he has always been a righteous, supportive, and sincere person. I was always very impressed by his relationship with his elderly parents. Igor consistently treated them with respect and went out of his way to aid them. This politeness and kindness transferred into the work environment where I have often seen him

effortlessly handle conflicts. I have seen angry parents quarrel about their children and everytime Igor was able to diffuse the situation and satisfy all sides of the disputes.

In addition to that, Igor had always been willing to accommodate us in terms of payment and was understanding when we were in difficult financial situations. Once, our family was in an extremely unpleasant situation but Igor and the school administration were very supportive. With his leadership, they were able to help us while strictly abiding by the law.

My husband and I own a small company called BEVERLY DAIRY DISTRIBUTION that delivers a variety of food products. Occasionally, we supplied dairy products to West Hollywood College Preparatory School. Igor proved himself as an honest person in business, too. He made sure that there were no delays with payment and no conflicts. Even doing such a small amount of business with him was a pleasure.

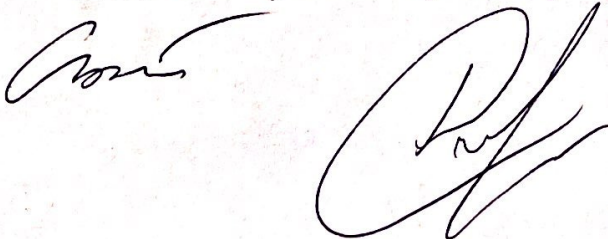
During the 14 years that Igor and I have known each other, our children became close friends and often visited each other's houses. I admired the atmosphere in Igor's family home. His calm, humorous, and friendly family always fostered the feeling of reliability and comfort.

Igor is a very positive and cheerful man. His students always strived and aspired to be more like him. As a result, my husband and I can only express positivity and praise toward Igor. It has been a pleasure to raise our kids in a school under his administration. He is a great director, amazing person and fantastic friend.

Sincerely,

Vladislava Rudenky and Andrey Rudenky

2/15/2022

The block contains two handwritten signatures in black ink. The signature on the left is a cursive, stylized name, likely Vladislava Rudenky. The signature on the right is also cursive and stylized, likely Andrey Rudenky. Both signatures are written in a fluid, connected style.

February 20, 2022

Honorable Indira Talwani

United States District Judge

John Joseph Maokley U.S. Courthouse

1 Courthouse Way, Suite 2300

Boston, Massachusetts 02210

Your Honor,

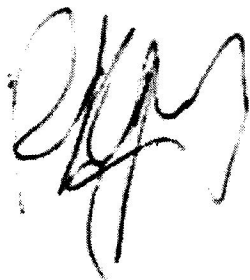
My name is Raphaello Kotziamanis and am the owner of Nemesis Multimedia. I have known Igor Dvorskiy for over 4 years. My wife and I were looking for a school for our daughter and It had been a traumatic time. Our search had been fruitless with we were at the end of our tether. Luckily, we happened upon West Hollywood Preparatory School and the wonderful Igor.

Igor listened to our plight and was receptive and warm. He offered our daughter a place where she would be taken care of and nurtured. He could not have been more accommodating. It was with great dismay that we found out he was no longer an active part of the school.

He always had time for those around him. He is well respected in the community of West Hollywood for his contributions to the Russian populous.

I have always found him to be a positive influence on everyone around him and a good friend.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'R. Kotziamanis', with a stylized, cursive script.

Raphaello Kotziamanis

February 21, 2022

Honorable Indira Talwani
United States District Judge
John Joseph Moakley U. S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

Dr. Charles Paus



Your Honor,

I am writing this letter in support of Igor Dvorsky. I am a high school and college Spanish teacher, recently retired after 30 years of teaching. I met Mr. Dvorsky in 2005, when I enrolled my daughter Arianna in the Dvorskaya School's preschool program. Arianna stayed at the Dvorskaya School for six years and transferred out into public school after third grade. Dvorskaya is a small school where there is a lot of collaboration between the administration, parents and teachers, and I had a lot of contact with Mr. Dvorsky throughout the years that my daughter attended the school. Following are my impressions of Mr. Dvorsky based on my experience at Dvorskaya.

Mr. Dvorsky is a competent and professional educator. He is a hands on kind of administrator who gets involved with the day to day operation of the school and the academic programs in particular. Over the years, I consulted with Mr. Dvorsky concerning my daughter many times, and I really appreciated his openness and willingness to help achieve the best possible academic outcome in every situation. Mr. Dvorsky is devoted to the academic success and individual development of all the students in his charge. Mr. Dvorsky plays a very important role in the Dvorskaya community, and is well liked and respected by students, parents and teachers. I hope that he can continue to direct the academic programs at the Dvorskaya School for many years to come. The school would not be the same without him.

Please let me know if you would like more information about my experience with Mr. Dvorsky and the Dvorskaya School.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Paus', with a long horizontal stroke extending to the right.

Charles Paus, Ph.D.

Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

We lived in Los Angeles from 2018 to 2021 to set up a hospitality business as German investors and operators (The Pearl Group, Inc. 1154 N Highland Ave, Los Angeles CA 90038). We are still very happy that we made the great decision to send our kids to West Hollywood College Preparation School, as this is the perfect school environment because of Igor Dvorskiy and his team. With love, passion and professionalism Igor Dvorskiy directed this school always to the best for our children. And still every time we come back to Los Angeles we send our kids on a daily basis as they always ask to meet back Igor Dvorskiy and his team. Even with challenging situations that always show up with small kids, Igor showed a great way to solve it for students, parents and his employees. Igor Dvorskiy is just that guy that you wish as a director for the school your kids attend.

Sincerely,



Oksana Kolenitchenko, 02/22/22



Daniel Kolenitchenko, 02/22/22

Family Kolenitchenko

[REDACTED]

[REDACTED]

February 22, 2022

Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

Dear Judge Talwani,

My name is Roman Kravtsov. Currently, I am retired due to health issues, but am a barber as my occupation. I know Igor for nearly 20 years. He was my client and became a good acquaintance over the years. I know his family and children. He would bring his mom to the salon, and I admired their relationship and his care for her. This is particularly important to me as I have similar relationship with my mother. As I saw his children growing up, I was impressed how smart they are and well behaved. You can tell a lot about a person by seeing their family and how they interact with each other.

I knew that Igor is the owner of a private school, and long before I had my children and before I was even married, I knew my children will most likely go to Igor's school. I knew my children would be in good hands there. As I got married and it was time for our first child to go to kindergarten, my wife still wanted to research and see other schools in our neighborhood. We looked at several schools in our area, but none of them came even close to what Igor has built. It was decided that our child will go to his school, even though it is not in our area. Our first daughter has been in there for eight years now and younger one since she was two years old. Every day, we take our children from North Hollywood to West Hollywood, but as parents, we know this is the right school for our children because of Igor's leadership. Whenever there is a problem, either academic or behavioral, he takes action right away and problem gets resolved in the best way possible. It is important for us that our children don't just learn Math and English, and other subjects, but be in the environment where they can grow up a good and caring person. This school became their second home, and most of it, if not all, is because of Igor and his standards.

Sincerely,

Roman Kravtsov

A handwritten signature in black ink, appearing to read 'Roman Kravtsov', written over a horizontal line.

Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Waym Suite 2300
Boston, Massachusetts 02210

Hello, my name is Natalya Kuzmin.

In the past, I worked with Igor Dvorsky for almost 10 years. I was a mathematics teacher for the Elementary School at West Hollywood College Prep. for grades 1-5. I worked closely with Igor and can confidently vouch for his character. Throughout the years that I worked with him, I've known him as a balanced, polite, kind-hearted, and generous person who genuinely cares for his peers. Working with young kids is a stressful job, but he made sure to always bring a calmness and comfort with him to work. He made both students and staff feel welcome and supported!

I would especially like to emphasize that when my family was in a time of need and going through a rough financial period, he offered to enroll my daughter in the High School program for 4 years without paying tuition. My daughter got an excellent education and Igor Dvorsky gave us that opportunity to bring her a personalized education for free. As far as I know, all children of his staff were offered an education at the school, free of any tuition. While I no longer work with Igor, I only recollect feelings of respect and friendship towards him and his family.

Thank you,
Signed, Natalya Kuzmin 2-22-2022

Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

02.22.2022

Your Honor,

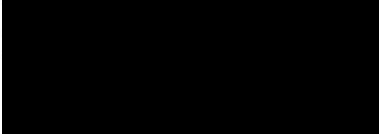
My daughter, Milana Prokopenko has been a student of Igor school for 7 years. I'm a low income and he gave me a good discount. As a parent of this school have seen Igor toiling hard and he is very responsible. I know that Igor is reliable, responsible, honest and polite. Kids love him. I would love to see Igor on his position because of his skills, knowledge and dedication. Given a chance, he will be an asset to any employer.

I will be pleased to give you further information concerning Igor's competence.

Sincerely,
Ekaterina Prokopenko

A handwritten signature in black ink, appearing to read 'Prokopenko', written in a cursive style.

JERRY SIDERMAN, D.D.S.



February 28, 2022

Honorable Indira Talwani
United States District Judge
John Joseph Moakley US Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

Your Honor,

My name is Dr. Jerry Siderman, I am self-employed, practicing dentistry in the United States for 30 years. I first became acquainted with Igor Dvorskiy about 12 years ago when I was searching for a new high school for my son, who due to an emotionally intense divorce between myself and my former wife, began acting out and exhibiting concerning behavior. Through mutual friends, I was introduced to Dvorskaya Alternative School where Igor was a teacher and supervisor.

Like Igor, I was born in Ukraine which was part of the former Soviet Union. We developed a bond through which he helped me navigate a tumultuous time in my life when I felt like my son was slipping away. He showed immense kindness and understanding towards my son and our situation. His advice and actions helped me to be a better father during a time when my son most needed it.

Igor's interactions with my son were a light in a dark time. He helped to instill valuable morals and lessons in my son's life that ultimately helped both of us to become better men.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jerry Siderman', followed by a long horizontal line.

Jerry Siderman

March 1, 2022

To: Honorable Indira Talwani
United States District Judge
John Joseph Moakley U. S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

From: Lyudmila Pravdina
LP Insurance & Financial Services, LLC
8455 Fountain Avenue Suite 530
West Hollywood, CA 90069

Dear Judge Indira Talwani,

I am a principle of LP Insurance & Financial Services, LLC based in West Hollywood, California. I've been in business since 1994 helping people in different lines of insurance, investment and taxation, volunteer to different community Boards.

I met Igor Dvirskiy about five years ago when I came to West Hollywood Prep school with my granddaughter. He was extremely polite, professional and passionate about his school, education and kids. He impressed me with his kindness, modesty and friendliness.

Igor was ready to help with financial aid when I explained him my family situation - chronically ill husband, my daughter been a single mom and my dedication to my business. I felt like I know him for years. We had a similar background - both immigrants from USSR, both from Ukraine, both Jewish. Our relationship got dipper with my volunteer involvement with school Advisory Board helping with budgeting and charity. I was impressed with his dedication to each child's success and wellbeing. School struggled financially because of his generosity to a lot of low-income immigrant's families. I questioned him on how each school year he was able to manage and budgeting income and expenses paying himself a very modest salary and working as a director, manager, supplier, meal delivery driver and much more.

Igor is a loving husband and father to his three very talented, kind and good-mannered kids. Also, he is a caregiver to his wonderful elderly parents - professional teachers.

I'm very lucky to meet Igor Dvirsky, who became not only my sincere friend, but an amazing friend and a good teacher to my daughter and granddaughter.

Sincerely,
Lyudmila Pravdina

A handwritten signature in black ink, appearing to read 'L. Pravdina', with a long, sweeping flourish extending from the end.

Erik Chase
[REDACTED]
[REDACTED]

March 02, 2022

Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

Dear Judge Talwani,

I'm currently the Senior Director of Claim Integrity at one of the largest Local Initiative Health Plans in the nation and I'm writing to describe my experience with Igor Dvorskiy and the staff at West Hollywood College Preparatory School.

As a first-time parent of a daughter, we (my wife and I) were nervous and apprehensive of locating a daycare for which we would be comfortable leaving our daughter for approximately 8-10 hours per day during the work week. We met with several establishments in our search however, when meeting with Igor, we were put at ease with his demeanor and his description of his staff, the curriculum, and the sense of lovingness as he described the fondness of former parents and students towards him and his team.

To that end, my daughter has been attending West Hollywood Preparatory School since 2017 and have encountered an extremely positive experience.

Unfortunately, I am not familiar with Igor's personal life or experiences however, I can affirm that I trust Igor and the staff the safety, security, and growth (personally and educationally) of my daughter.

Should you require additional information or dialogue regarding my experience, please do not hesitate to contact me.

Sincerely,



Erik Chase
[REDACTED]

Galina Gurova

[REDACTED]

March 5, 2022

Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

Your Honor;

My name is Galina Gurova and I've known Igor Dvorskiy for a number of years. My grandchildren attended West Hollywood College Preparatory School and during this time I had a chance to interact with Igor. It was challenging for my grandson to adjust to a new school, and his grades suffered as a result. Igor was always ready to provide guidance and support to my grandson, to me and to other members of our family. Igor was always there for me, ready to answer all of my questions and to address all of my concerns. He was patient, kind and understanding.

Igor is well-regarded among members of our community as a person of high integrity and honesty. Igor Dvorskiy has a strong sense of duty, which applies to his family and community.

Please do not hesitate to call me if there is any additional information I can provide.

Sincerely,


Galina Gurova

KATERINA WEST, PSY.D.



March 5, 2022

Honorable Indira Talwani,
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

Dear Judge Talwani;;

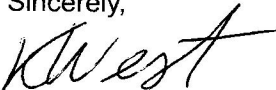
My name is Katerina West and I am a psychotherapist in a private practice setting.

I met Igor Dvorskiy in 2014 when I enrolled my children in West Hollywood College Preparatory School. At that time Igor Dvorskiy was a school director and as a parent of two teenagers I interacted with him on a regular basis. I have seen many aspects of Igor's personality and I have always found him to be extremely kind, dependable, and well regarded among members of my community. I know Igor to be dependable and honest. He has always been caring and generous with others.

2014 was a very difficult year for my family, marked by an illness of a family member, and a loss of business. I couldn't pay my children's tuition in full, and I was faced with a difficult decision of transferring my children to another school in the middle of a school year. After Igor found out about my circumstances, he suggested that I keep my children in school without paying any tuition. As a result of his kindness and generosity both of my children were able to finish their school year without interruption. I am extremely grateful to Igor Dvorskiy for being so caring and compassionate.

Igor Dvorskiy has always been an upright character in the community. It is my sincere hope the court takes this letter in consideration. I believe Igor Dvorskiy to be a valuable member of my community, and a good human being.

Sincerely,



Katerina West, Psy.D.

To Whom It May Concern

From:

Tanya Kutasevich



The first time we met with Mr. Dvorskiy was in August 2003 when we were looking for a preschool for our son. At that time we visited several schools and could not find a good match for him. David had a severe speech delay, and we needed some help so he could catch up with other kids. Mr. Dvorskiy and his staff tried everything possible and impossible to accomodate my son. When LAUSD suggested speech therapy sessions, Mr. Dvorskiy personally met my son when he was arriving daily on the school bus. He was able to arrange a special lesson with the speech pathologist at the school to help my son make even faster progress.

David was attending the same school till he was in the 6th grade before he switched schools. His math and science skills were so advanced that he was able to skip a grade at his new school.

My two other kids were also attending the same school and Mr. Dvorskiy was very attentive to their needs. He was very proactive in offering extra help at no charge to us and was very honest when we needed feedback on our kids' successes and failures.

Mr. Dvorskiy had a great talent for finding the right people for the job. All the teachers that work at the school were very experienced. These great teachers always worked together as a team when some of my kids experienced setbacks. I remember very well how serious the school was about the kids being healthy. They were always advised to wash their hands and stay at home when they were sick. These hygiene rules not only kept kids in school during flu season but taught them the basics on what it takes to stay healthy. We visited several schools and it was one of the few that cared so deeply about kids' health, and it was all done under Mr. Dvorskiy's leadership.

During the years, we kept in touch with Mr. Dvorskiy. He always wanted to learn more about my kids and was very proud of their success. I want to testify that Mr. Dvorskiy is a great person who helped many families who could not pay tuition and always tried to make sure that tuition fees are affordable for all families. The foundational skills my kids received with the help of Mr. Dvorskiy helped them to succeed. My two sons were accepted at the Early Entrance Program at Cal State LA at the age of 14. My older son was accepted to medical school and my daughter works as ecommerce director in one of the established companies in San Francisco. I hope this letter will help you to see Mr. Dvorskiy the way I see him: the kind and smart educator who helped our children succeed.

Tanya Kutasevich
A handwritten signature in red ink, appearing to read 'Tanya Kutasevich', with a stylized flourish below the name.

3/12/2022

EXHIBIT E

EXHIBIT E

Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

From: Inna Pustovoitova

Your Honor,

I am Inna Pustovoitova. I have known Igor Dvorskiy since 2012. Since this time, he has shown himself to be a caring, honest, and good-willed person. Igor has always done his best to help people experiencing difficulties. Now, as a consequence of Russia's war against the Ukraine, Igor has exerted a lot of effort to help my invalid daughter Nadya in the Ukraine to receive refugee status in America. He helped secure all the necessary documents that allowed my daughter to arrive in the US. Similarly, Igor has helped a number of Ukrainian families bring their children to the US during this humanitarian crisis.

I know Igor as an exemplary father of three children who are now studying in universities, and as the caring head of a loving family. Kindness, care for others, and conscientiousness are Igor's primary character attributes.

Sincerely,
Inna Pustovoitova

A handwritten signature in black ink, appearing to be 'IP' or 'Inna Pustovoitova' in a stylized cursive script.

Sofya Davidovich
Real Estate Broker

April 13, 2022

Re: Mr. Igor Dvorsky

Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

Honorable Indira Talwani,

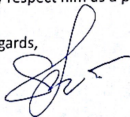
My name is Sofya Davidovich and I am Real Estate Broker, owner of Citywide Realty Services, Inc. I am a former member of the Board of Directors of the West Hollywood College Preparatory School. I have known Igor and the entire Dvorskiy family since my son, who is now 32 years old, started to attend math tutoring sessions with Igor's mother, Elina Dvorskaya. Over the years, both my children and my grandchildren have attended WHCP School for schooling and tutoring. My youngest granddaughter is still a student there.

Seeing how Igor and his mother care so much about all of their students, I gladly accepted the opportunity to join the school board. My experience working very closely with Igor has always been very positive and pleasant, because he is a very honest, helpful and transparent person. He and his family have donated to different charitable organizations over these years. During the current crises going on in his native country of Ukraine, he is actively involved in helping refugee families coordinate life and schooling for the children coming to Los Angeles from Ukraine. He is always ready to help anyone who needs it.

In addition to being an active member of the community, he is also an extremely caring father, husband and son. While his kids were school aged, I would always see him bringing them to school, picking them up and taking them to various extracurricular activities. Now that the kids have grown up, he takes care of his parents as well as his mother in law.

I greatly respect him as a person and an active member of the society.

Best Regards,



Sofya Davidovich

EXHIBIT F

EXHIBIT F

Honorable Indira Talwani
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

Your Honor,

I sincerely and deeply regret that I inflicted damage to the college admissions testing system and would like to extend a genuine apology to all the families and children whose college admissions have been negatively affected by my actions, to the WHCP community that for the past 20 years served as my second home, and to my family, friends, and colleagues who for past 3 and a half years, despite all the hardships, have stuck by my side.

Through this dreadful, grim, and wrong choice I made, I continue to live with the repercussions of this terrible mistake. I have directly harmed and destroyed the reputation of my consistently hard-working family, the honest reputation of my school, and my personal reputation

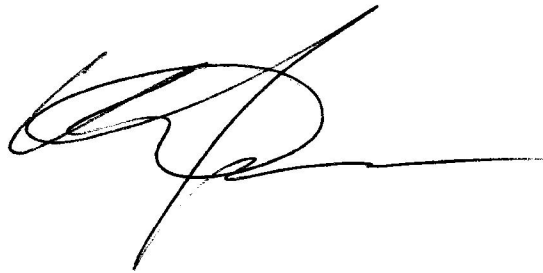
I grew up in the Soviet Union, because of my Jewish ethnicity, I encountered significant obstacles that affected my personal and social development, and limited my educational and professional opportunities. When I moved to the US, I knew that I wanted to dedicate my life here to helping those who, just like I did, encounter barriers. I wanted to help make difficult tasks more manageable and opportunities more plentiful.

When Rick Singer first approached me, I was impressed by his apparent success and I was excited about the possibility of collaborating with him. Initially I thought that using West Hollywood College Preparatory campus as a testing center would be beneficial to my school and I thought that the payment Mr. Singer offered me was appropriate. I believed that the students that were coming to WHCP to take exams were affiliated with Mr. Singer's non-profit organization and that many, if not all, of them were poor. After a few weekends of administering tests at WHCP, I realized that Mark Riddell was correcting students' exams and I knew I was submitting intentionally false information to the College Board and ACT that was helping cover up Mark Riddell's test taking. To my regret, I continued to participate in the scheme anyway. At the time I told myself that it was helping WHCP, that the students taking the test were needy, and that it wasn't such a big deal. I now realize the wrongfulness of my actions and the extent of the harm caused. The hardest part for me is knowing that through my actions I, the (now former) Director of WHCP, have been a bad example for my children, my students, and my community, who I care about so much.

I did not know about the true nature and the depths of the scheme orchestrated by Mr. Singer. But I now understand the negative and sad impact that this atrocious conspiracy has had on the community at large.

I am still horrified knowing how much harm I have caused throughout the course of my actions. As always said to me by my grandfather growing up, who was a rabbi, "Every person has to take accountability for their actions in the eyes of God and in the eyes of society." Therefore, it was important to me to take responsibility for my actions and to appear before Your Honor in person. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to be 'Igor Dvorskiy', with a long horizontal line extending to the right.

Igor Dvorskiy