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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, vs. EDVARD PARONYAN, Defendant.	**Case No.: 20-CR-579(A)-SVW** **DEFENDANT EDVARD PARONYAN'S JOINDER IN DEFENDANT R. AYVAZYAN'S AND M. TERABELIAN'S MOTION FOR A KASTIGAR HEARING TO DISQUALIFY THE PROSECUTION TEAM (DKT. 338) AND SUPPLEMENTAL MEMORANDUM**

Defendant Edvard Paronyan, by and through his counsel of record, Michael G. Freedman, hereby joins in Defendant R. Ayvazyan's and M. Terabelian's Motion for Kastigar Hearing to Disqualify the Prosecution Team and Dismiss the Case (Dkt. 338) and provides the attached supplemental memorandum in support of his joinder.

Dated: May 19, 2021

Respectfully submitted,

By: */s/ Michael G. Freedman*
Michael G. Freedman
Attorney for Defendant
Edvard Paronyan

SUPPLEMENTAL MEMORANDUM

Mr. Paronyan was not charged in the original complaint or initial indictment in this case. (Dkt. 1 & 32). Rather, Mr. Paronyan was charged in the First Superseding Indictment in March 2021. This timing gives rise to an inference that the prosecution team used tainted information to build its case against Mr. Paronyan and in its decision to prosecute him. Accordingly, Mr. Paronyan joins in Defendant R. Ayvazyan's and M. Terabelian's Motion for Kastigar Hearing to Disqualify the Prosecution Team and Dismiss the Case (Dkt. 338) as well as Defendant Grigoryan's Joinder in that motion (Dkt. 346).

Mr. Paronyan respectfully requests that the Court: (1) order all individuals who possessed, reviewed, or discussed the illegally-obtained evidence to provide testimony in this matter; (2) order the government to disclose the grand jury transcripts to the defense in advance of the hearing as well; and (3) order that the government disclose its trial exhibits in advance of the hearing.

Dated: May 19, 2021

Respectfully submitted,

By: */s/ Michael G. Freedman*
Michael G. Freedman
Attorney for Defendant
Edvard Paronyan