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UNITED STATES DISCTRICT COURT

CENTERAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, vs. ARMAN HAYRAPETYAN, DEFENDANT.	CASE NO.: CR 20-579(A)-SVW-6 **UNOPPOSED *EX PARTE* APPLICATION TO MODIFY CONDITIONS OF RELEASE: DECLARATION OF COUNSEL** **[PROPOSED ORDER FILED CONCURRENTLY]**

Arman Hayrapetyan, by and through counsel, hereby files this unopposed ex parte application to modify the conditions of release. Specifically, Mr. Hayrapetyan seeks an order replacing his home confinement condition with standalone monitoring.

This application is based on the attached declaration of counsel.

DECLARATION OF COUNSEL

I, Jilbert Tahmazian, do declare and state:

1. I represent Arman Hayrapetyan in this matter. I am licensed to practice in the State of California, admitted to practice before this Court.

2. On June 7th, 2021 Judge Stephen Wilson granted Mr. Hayrapetyan's application for reconsideration of detention. *See* Dkt. No. 444. After submitting the bond documents to criminal intake, Magistrate Judge Paul Abrams signed a release order for Mr. Hayrapetyan on June 8th, 2021. As part of his release, Mr. Hayrapetyan was required to be placed on location monitoring, which restricted him to his home.

3. Mr. Hayrapetyan lives alone and survives off of the income he makes working in ambulatory transportation. Without this income Mr. Hayrapetyan will be unable to pay his bills.

4. As a result, I respectfully request that the Court modify the terms on Mr. Hayrapetyan's bond to replace the home confinement condition with a stand-alone monitoring condition. This would allow the defendant to resume employment and, in turn, possess some modicum of financial stability.

5. All other conditions would remain unchanged.

6. I have conferred with Assistant United States Attorney Catherine Ahn and Pretrial Services Officers Theophile and Kwon regarding the relief sought here. Ms. Ahn, Officer Theophile, and Officer Kwon indicated that they do not oppose the relief sought in this application.

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7. Mr. Samsonian and Ms. Manukyan consent to the modification as well.

Dated: June 16th, 2021

Respectfully Submitted,

BY: _____

JILBERT TAHMAZIAN,
Attorney for Defendant