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8 **Attorney for Defendant Edvard Paronyan**

9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,	}	Case No.: 20-CR-579(A)-SVW
12 Plaintiff,		UNOPPOSED <i>EX PARTE</i>
13 vs.		APPLICATION TO MODIFY
14 EDVARD PARONYAN,		CONDITIONS OF RELEASE RE:
15 Defendant.		SON'S FIFTH GRADE
16		GRADUATION ON JUNE 6, 2021
17		[Proposed Order Filed Concurrently]

18 Edvard Paronyan, by and through his counsel of record, Michael G.
19 Freedman, hereby files this unopposed *ex parte* application for an Order modifying
20 the conditions of his pretrial release to allow Mr. Paronyan to attend his son's fifth
21 grade graduation ceremony on June 6, 2021 from 9:00 a.m. to 2:00 p.m. in Canoga
22 Park. The government has no objection to this request. This application is based
23 on the attached Declaration of Michael G. Freedman.

24 Dated: May 31, 2021

25 Respectfully submitted,

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

UNOPPOSED *EX PARTE* APPLICATION

DECLARATION OF MICHAEL G. FREEDMAN

I, Michael G. Freedman, do declare and state:

1. I am counsel for Edvard Paronyan in this matter. I am licensed to practice in the State of California, and admitted to practice before this Court.

2. On March 9, 2021, Mr. Paronyan was charged by the First Superseding indictment in this matter with several counts of conspiracy and wire and bank fraud relating to an alleged scheme to submit fraudulent loan applications seeking COVID-19 relief funds guaranteed by the Small Business Administration (SBA) under the Coronavirus Aid, Relief, and Economic Security (CARES) Act. (Dkt. 154).

3. On March 11, 2021, the Honorable Maria A. Audero, United States Magistrate Judge, ordered Mr. Paronyan released on a \$75,000 unsecured bond to be signed by his brother, Zaven Paronian. (Dkt. 177). Judge Audero ordered that the unsecured bond be replaced by a \$75,000 bond secured by Zaven Paronian's real property on or before April 1, 2021. (*Id.*) On March 30, 2021, Mr. Paronyan filed an *ex parte* application for a thirty-day extension to post the secured bond due to a Coronavirus-related backlog at the Los Angeles County Registrar-Recorder. (Dkt. 228). That extension was granted on March 31, 2021 (Dkt. 252), and Mr. Paronyan posted the secured bond on April 28, 2021 (Dkt. 320).

4. Mr. Paronyan signed a plea agreement with the government on May 26, 2021 (Dkt. 368), but the Court declined to accept the plea at a change of plea hearing on May 27, 2021 (Dkt. 375). Jury trial is scheduled for June 15, 2021.

5. The conditions of Mr. Paronyan's release restrict him to his residence except for medical needs or treatment, attorney visits, court appearances, and employment, all of which must be preapproved by U.S. Pretrial Services.

6. Mr. Paronyan's son Christopher is finishing fifth grade at the AGBU School

DECLARATION OF COUNSEL

1 in Canoga Park, California. A graduation ceremony for students and their families
2 is scheduled for Sunday, June 6, 2021 from approximately 9:00 a.m. to 2:00 p.m.
3 Mr. Paronyan hopes to attend his son's graduation along with his wife and
4 daughter. Mr. Paronyan requested permission from his pretrial supervision officer
5 on approximately May 27, 2021 and was informed he would have to seek a Court
6 order.

7 7. I have communicated with Assistant United States Attorney Scott
8 Paetty, who represents the government in this matter. Mr. Paetty advised
9 me that the government does not oppose the relief sought in this application.

10 I declare under penalty of perjury under the laws of the United States of
11 America that the foregoing is true and correct and that this declaration is executed
12 at Los Angeles, California on May 31, 2021.

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14 /s/Michael G. Freedman

15 Michael G. Freedman
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DECLARATION OF COUNSEL