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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,

12 Plaintiff,

13 vs.

14 EDVARD PARONYAN,

15 Defendant.

16 **Case No.: 20-CR-579(A)-SVW**

17 **UNOPPOSED *EX PARTE***
18 **APPLICATION TO MODIFY**
19 **CONDITIONS OF RELEASE**

20 **[Proposed Order Filed Concurrently]**

21 Edvard Paronyan, by and through his counsel of record, Michael G.
22 Freedman, hereby files this unopposed *ex parte* application for an Order modifying
23 the conditions of his pretrial release to allow Mr. Paronyan to attend his daughter's
24 kindergarten graduation ceremony on June 25, 2021 from approximately 10:00
25 a.m. to approximately 1:00 p.m. in Canoga Park and his godchildren's baptism in
26 Van Nuys from approximately 5:00 p.m. on June 25, 2021 to approximately 1:00
27 a.m. on June 26, 2021. The government has no objection to this request. This
28 application is based on the attached Declaration of Michael G. Freedman and the
attached Declaration of Zaven Paronian (the surety for Mr. Paronyan's bond).

UNOPPOSED *EX PARTE* APPLICATION

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2 Dated: June 22, 2021

Respectfully submitted,

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4 By: /s/ Michael G. Freedman
5 Michael G. Freedman
6 Attorney for Defendant
7 Edvard Paronyan
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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). Mr. Paronyan signed a revised plea agreement with the government on June 8, 2021, which the Court accepted on June 11, 2021. (Dkt. 524).

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. On May 31, 2021, Mr. Paronyan filed an ex parte request to modify

DECLARATION OF COUNSEL

1 the conditions of his pretrial release to allow him to attend his son's fifth grade
2 graduation at the AGBU School in Canoga Park, California on Sunday, June 6,
3 2021 from approximately 9:00 a.m. to 2:00 p.m. (Dkt 387). This Court granted
4 that request on June 1, 2021. (Dkt. 396.)

5 7. Mr. Paronyan's daughter is finishing kindergarten at the AGBU
6 School in Canoga Park, California. A graduation ceremony for students and their
7 families is scheduled for Friday, June 25, 2021 from approximately 10:00 a.m. to
8 approximately 1:00 p.m. Mr. Paronyan hopes to attend his daughter's graduation
9 along with his wife and son.

10 8. Also on June 25, 2021, Mr. Paronyan's godchildren are being baptized at
11 The St. Peter Armenian Apostolic Church in Van Nuys, California. In his role as
12 godfather, Mr. Paronyan is officiating at the baptism and is listed as a host on the
13 invitation. The baptism is scheduled to run from approximately 5:00 p.m. to
14 approximately 6:30 p.m. at the church, and will then be followed by a family
15 dinner at a banquet hall in Van Nuys, which will last until approximately 1:00 a.m.

16 9. I have communicated with Assistant United States Attorney Catherine Ahn,
17 who represents the government in this matter. Ms. Ahn advised me that the
18 government does not oppose the relief sought in this application.

19 I declare under penalty of perjury under the laws of the United States of
20 America that the foregoing is true and correct and that this declaration is executed
21 at Los Angeles, California on June 22, 2021.

22 /s/Michael G. Freedman

23 Michael G. Freedman

24 Counsel for Defendant

25 Edvard Paronyan
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