

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

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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). The Court granted that
4 request on June 1, 2021. (Dkt. 396).

5 7. On June 22, 2021, Mr. Paronyan filed an ex parte application to modify
6 the conditions of his pretrial release to allow him to attend his daughter's
7 kindergarten graduation ceremony and his godchildren's baptism, both on June 25,
8 2021. (Dkt. 561). The Court granted that request on June 22, 2021. (Dkt. 570).

9 8. Following the June 22, 2021 request, I communicated with United States
10 Pretrial Services Officer Allyson Theophile, who expressed to me that she
11 recommends Mr. Paronyan's pretrial release conditions be modified from home
12 confinement to a curfew requiring him to be home between the hours of 10:00 p.m.
13 and 5:00 a.m. Officer Theophyle emailed the same request to the Assistant United
14 States Attorneys assigned to this case on June 22, 2021. Specifically, Officer
15 Theophyle noted that this request "would allow Mr. Paronyan to seek employment
16 and help provide for his family and take care of his family." Furthermore, she
17 noted that "Mr. Paronyan has been compliant in regards to his supervision and is
18 abiding by all of his reporting instructions. Although born in Armenia, he has
19 strong ties to the CAC and willing sureties."

20 9. On June 30, 2021, Assistant United States Attorney Catherine Ahn
21 responded to Officer Theophile that "[t]he government has no objection to your
22 recommendation, on the understanding that other conditions (location monitoring,
23 etc.) would remain the same." Officer Theophile responded the same day that she
24 would advise the location monitoring officer that "he can place Mr. Paronyan on
25 stand alone [location monitoring]. He will continue on [location monitoring] just a
26 different level." A true and correct copy of the above-described email
27 correspondence is attached to this declaration.

28 10. As Officer Theophile notes, the requested modification would allow Mr.

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1 Paronyan to help support his family. He has young children and it has been
2 difficult for him and his wife to manage their schedules, especially during the
3 summer, when he has been unable to leave the home. The requested modification
4 would ease the burden on Mr. Paronyan's family by allowing him to help with
5 family responsibilities.

6 11. In addition to the positions of AUSA Ahn and Officer Theophile, Mr.
7 Paronyan's surety, his brother Zaven Paronian, consents to the modification as
8 well, as noted in the concurrently filed declaration.

9 I declare under penalty of perjury under the laws of the United States of
10 America that the foregoing is true and correct and that this declaration is executed
11 at Los Angeles, California on July 1, 2021.

12 /s/Michael G. Freedman

13 Michael G. Freedman

14 Counsel for Defendant

15 Edvard Paronyan
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DECLARATION OF COUNSEL

Michael@thefreedmanfirm.com

From: Allyson Theophile <Allyson_Theophile@cacp.uscourts.gov>
Sent: Wednesday, June 30, 2021 10:00 PM
To: Ahn, Catherine S. (USACAC)
Cc: Faerstein, Brian (USACAC); michael@thefreedmanfirm.com; Paetty, Scott (USACAC); Fenton, Christopher (CRM)
Subject: Re: Revised by Court - RE: US v. Paronyan, 20-579-SWV, Unopposed Ex Parte to Modify Conditions of Release

Thank you Catherine. I will advise the LM Officer that he can place Mr. Paronyan on stand alone LM. He will continue on LM just a different level.

Thank you,

Allyson

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From: Ahn, Catherine S. (USACAC) <Catherine.S.Ahn@usdoj.gov>
Sent: Wednesday, June 30, 2021 2:27:40 PM
To: Allyson Theophile <Allyson_Theophile@cacp.uscourts.gov>
Cc: Faerstein, Brian (USACAC) <Brian.Faerstein@usdoj.gov>; michael@thefreedmanfirm.com <michael@thefreedmanfirm.com>; Paetty, Scott (USACAC) <Scott.Paetty@usdoj.gov>; Fenton, Christopher (CRM) <Christopher.Fenton@usdoj.gov>
Subject: RE: Revised by Court - RE: US v. Paronyan, 20-579-SWV, Unopposed Ex Parte to Modify Conditions of Release

CAUTION - EXTERNAL:

Officer Theophile,

The government has no objection to your recommendation, on the understanding that other conditions (location monitoring, etc.) would remain the same.

Sincerely,
Catherine

Catherine S. Ahn | Assistant United States Attorney
Criminal Division | **Major Frauds**
✉ catherine.s.ahn@usdoj.gov | ☎ 213.894.2424
🌐 <https://www.justice.gov/usao-cdca>

From: Ahn, Catherine S. (USACAC)
Sent: Monday, June 28, 2021 8:33 AM
To: Allyson Theophile <Allyson_Theophile@cacp.uscourts.gov>
Cc: Faerstein, Brian (USACAC) <bfaerstein@usa.doj.gov>; michael@thefreedmanfirm.com; Scott Paetty (USACAC) (spaetty@usa.doj.gov) <spaetty@usa.doj.gov>; Christopher Fenton (CRM) (Christopher.Fenton@usdoj.gov) <Christopher.Fenton@usdoj.gov>
Subject: RE: Revised by Court - RE: US v. Paronyan, 20-579-SWV, Unopposed Ex Parte to Modify Conditions of Release

Thank you, Officer Theophile. We are reviewing and will let you know our position shortly. Thank you for your patience.

From: Allyson Theophile <Allyson_Theophile@cacp.uscourts.gov>

Sent: Tuesday, June 22, 2021 5:08 PM

To: Faerstein, Brian (USACAC) <bfaerstein@usa.doj.gov>; michael@thefreedmanfirm.com; Ahn, Catherine S. (USACAC) <cahn@usa.doj.gov>

Subject: FW: Revised by Court - RE: US v. Paronyan, 20-579-SWV, Unopposed Ex Parte to Modify Conditions of Release

Hello,

I am emailing you regarding Edvard Paroyan who I am supervising. I am requesting that Mr. Paronyan's LM condition be modified to curfew instead or stand-alone monitoring instead of home detention. This will allow him to seek employment to help provide for his family and take care of his family. My suggestion is either a curfew between the hours of 10:00 pm to 5:00 am. Mr. Paronyan has been compliant in regards to his supervision and is abiding by all of his reporting instructions. Although born in Armenia, he has strong family ties to the CAC and willing sureties.

Please let me know if you require any additional information.



ALLYSON THEOPHILE

SPECIAL OFFENDER SPECIALIST

UNITED STATES DISTRICT COURT

CALIFORNIA CENTRAL PROBATION & PRETRIAL SERVICES

300 North Los Angeles Street
Los Angeles, CA 90012-3308

Office: (213) 894-3716 Mobile: (213) 308-6171 Fax: (213) 894-0231

Email: Allyson_Theophile@cacp.uscourts.gov

From: MAACHambers <MAA_Chambers@cacd.uscourts.gov>

Sent: Tuesday, June 22, 2021 4:38 PM

To: michael@thefreedmanfirm.com

Cc: 'Faerstein, Brian (USACAC)' <Brian.Faerstein@usdoj.gov>; 'Ahn, Catherine S. (USACAC)'

<Catherine.S.Ahn@usdoj.gov>; christopher.fenton@usdoj.gov; Scott.Paetty@usdoj.gov; Allyson Theophile

<Allyson_Theophile@cacp.uscourts.gov>

Subject: Revised by Court - RE: US v. Paronyan, 20-579-SWV, Unopposed Ex Parte to Modify Conditions of Release

Hi Counsel

Revised order issued by the Court.

Thank you



JAMES R. II MUNOZ
MAGISTRATE JUDGE COURTROOM DEPUTY
UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
255 East Temple Street Room 570
Los Angeles CA, 90012-3332
Office: 213-894-1831 Fax: 213-894-8906
Email: james_munoz@caod.uscourts.gov

From: michael@thefreedmanfirm.com <michael@thefreedmanfirm.com>
Sent: Tuesday, June 22, 2021 2:05 PM
To: MAACHambers <MAA_Chambers@caod.uscourts.gov>
Cc: 'Faerstein, Brian (USACAC)' <Brian.Faerstein@usdoj.gov>; 'Ahn, Catherine S. (USACAC)' <Catherine.S.Ahn@usdoj.gov>; christopher.fenton@usdoj.gov; Scott.Paetty@usdoj.gov; Allyson Theophile <Allyson_Theophile@cacp.uscourts.gov>
Subject: RE: US v. Paronyan, 20-579-SWV, Unopposed Ex Parte to Modify Conditions of Release

CAUTION - EXTERNAL:

Good afternoon,

Attached is the ex parte application to modify pretrial release conditions (relating to a June 25 matter) for Defendant Edvard Paronyan, as well as the Proposed Order in Word format.

Thank you,
Michael Freedman

Michael G. Freedman
THE FREEDMAN FIRM PC

800 Wilshire Blvd., Suite 1050
Los Angeles, CA 90017
Office: (213) 816-1700
Mobile: (310) 339-4503
Email: michael@thefreedmanfirm.com
Web: <http://www.thefreedmanfirm.com>

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