

DECLARATION OF CHRISTOPHER FENTON

I, CHRISTOPHER FENTON, hereby declare as follows:

1. I am a Trial Attorney at the Fraud Section within the Criminal Division of the Department of Justice. I represent the government in this matter and submit this declaration in support of the Government's Opposition to Defendant Edvard Paronyan's Ex Parte Motion to Modify Conditions of Pretrial Release.

2. In connection with the defendant's motion, I spoke with United States Probation and Pretrial Services Officer Stacey Cooke on Tuesday, August 10, 2021, to obtain more information about the defendant's ongoing supervision and conditions of release. I spoke with Officer Cooke again on Wednesday, August 11, 2021. Officer Cooke, who is responsible for monitoring the defendant's location, told me that she believes location monitoring should remain in place.

3. Officer Cooke also explained that the defendant's claim that he typically receives location monitoring notifications every night around 3:00a.m. or 4:00a.m. is not true. According to Officer Cooke, the location monitoring notifications are random so as to prevent the defendant from knowing precisely when he will be required to check-in. If, as the defendant claims, the location monitoring notifications requiring him to check-in took place every night around the same time, the defendant would be able to ignore curfew and arrive home by 3:00a.m.

4. In light of the defendant's concerns about uninterrupted sleep and wish to travel locally by car, Officer Cooke is agreeable to outfit the defendant with a location monitoring ankle bracelet.