

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 prohibit him from travelling overnight without permission from the Court.

6. Mr. Paronyan hopes to take his family (wife and two young children) to

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1 Palm Springs for the Labor Day weekend. Specifically, he seeks to travel to Palm
2 Springs on Friday, September 3, 2021 and remain there until Monday, September
3 6, 2021, returning home to Los Angeles on September 6, 2021.

4 7. I have communicated with Assistant United States Attorney Catherine Ahn,
5 who represents the government in this matter. Ms. Ahn advised me that the
6 government opposes the relief sought in this application. I have also
7 communicated with United States Pretrial Officer Devona Gardner who advised
8 me that Pretrial opposes the relief sought in this application.

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 August 31, 2021.

12 /s/Michael G. Freedman

13 Michael G. Freedman

14 Counsel for Defendant

15 Edvard Paronyan
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