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10
11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**
13 **WESTERN DIVISION**
14

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 v.

18 EDVARD PARONYAN,

19 Defendant.

Case No. 20-579-SVW

**DEFENDANT EDVARD
PARONYAN'S POSITION
REGARDING SENTENCING;
EXHIBITS**

Hearing Date: September 27, 2021
Hearing Time: 11:00 a.m.

20 Edvard Paronyan, by and through his attorney of record, hereby files his position
21 regarding sentencing. This position is based upon the following memorandum, the
22 presentence report prepared by the United States Probation Office, the documents and
23 records on file in this matter, and any argument or evidence presented at the hearing on
24 this matter or which the Court may wish to consider.

25 Respectfully submitted,

26 DATED: September 13, 2021

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

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MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

Edvard Paronyan is a hard-working immigrant and devoted family man who mistakenly and improperly obtained more PPP and EIDL loans than his legitimate business was lawfully entitled to, in part to help keep his employees employed during the pandemic. In contrast to Mr. Paronyan, the other defendants in this case were part of a conspiracy involving fake identities and businesses and obtained far larger sums than Mr. Paronyan, which they laundered for real estate purchases. Also unlike the other defendants involved in that conspiracy, Mr. Paronyan took responsibility for his misconduct early in this case through a guilty plea. After Mr. Paronyan's first plea agreement, the Court recognized he was not a member of the conspiracy, and Mr. Paronyan continued negotiating with the government to plead guilty and take responsibility for his own fraudulent conduct. And unlike the lead defendants, Mr. Paronyan has not fled following his conviction and is prepared to be sentenced.

For the numerous reasons discussed below, Mr. Paronyan believes a sentence of probation or home arrest is sufficient, but not greater than necessary. First, the PSR calculated Mr. Paronyan's sentencing range as 27-33 months based on a total offense level of 16 and a criminal history category of III. But Mr. Paronyan should qualify for a four-level mitigating role departure and his criminal history category is overstated, so his sentencing range should be calculated as 12-18 months, placing him in Zone C.

Second, a sentence of probation or home confinement is a fair and just sentence for Mr. Paronyan for numerous reasons under the factors enumerated in 18 U.S.C. § 3553(a). Mr. Paronyan overcame considerable hardships early in life, has built an exemplary life for himself, and is devoted to his family, community, and employees as described in dozens of letters to the Court. Indeed, the initial reason he obtained PPP and EIDL loans was to be able to continue paying his employees, who praise him as a boss. Of course, he ultimately violated the law by obtaining a higher amount than his

business was entitled to and not using the loans only for his business, but he recognizes his mistake and has experienced deep shame in his community. In addition to that punishment, he will also face the severe punishment of likely deportation to Armenia, where he has not lived since he was ten. These forms of punishment make it unnecessary to further punish Mr. Paronyan with a lengthy term of imprisonment. A lengthy term of imprisonment would also create a disparity between Mr. Paronyan and other defendants nationwide who have stolen far larger sums in PPP loans, without any legitimate businesses, much like the other defendants in this case too. A lengthy prison term is also unnecessary to deter Mr. Paronyan, and would delay his ability to make full restitution, which he intends to do as he rebuilds his life and career following the pandemic and the mistakes he has made.

II. SENTENCING GUIDELINES CALCULATIONS AND OBJECTIONS TO THE PRESENTENCE REPORT

The Probation Office calculated Mr. Paronyan's sentencing guidelines range as 27-33 months. (PSR at 3.) This range was based on a total offense level of 16 and a criminal history category of III. (*Id.*) As noted further below, Mr. Paronyan respectfully disagrees with the Probation Office's guidelines calculations.

A. Mr. Paronyan Qualifies for a Four-Level Mitigating Role Adjustment¹

Section 3B1.2 of the Sentencing Guidelines provides for a mitigating role adjustment when the defendant is substantially less culpable than the average participant. "The fact that a defendant performs an essential or indispensable role in the criminal activity is not determinative. Such a defendant may receive an adjustment under this guideline if he or she is substantially less culpable than the average

¹ Although the PSR states that the parties agree not to argue for additional specific offense characteristics, adjustments, and departures under the Sentencing Guidelines, in fact the plea agreement provides an exception stating that Mr. Paronyan reserves the right to argue for -- and the government reserves the right to contest -- that an adjustment for mitigating role under U.S.S.G. § 3B1.2 applies. (PSR ¶ 5; Dkt. 469 at p. 16:1-3.)

1 participant in the criminal activity.” U.S.S.G. § 3B1.2, comment. n. 3(C). “The
 2 determination . . . is based on the totality of the circumstances and is heavily dependent
 3 on the facts of the particular case.” *Id.* The Guidelines provide the following non-
 4 exhaustive list of factors for the Court to consider:

5 (i) the degree to which the defendant understood the scope and structure
 6 of the criminal activity; (ii) the degree to which the defendant participated
 7 in planning or organizing the criminal activity; (iii) the degree to which the
 8 defendant exercised decision-making authority or influenced the exercise
 9 of decision-making authority; (iv) the nature and extent of the defendant's
 10 participation in the commission of the criminal activity, including the acts
 11 the defendant performed and the responsibility and discretion the defendant
 12 had in performing those acts; (v) the degree to which the defendant stood to
 13 benefit from the criminal activity.

14 *Id.*

15 And the Ninth Circuit has explained that:

16 Once the court has considered all the factors, however, it may grant or
 17 deny a reduction even if some of the factors weigh toward the opposite
 18 result. A district court, therefore, may grant a minor role reduction even
 19 if some of the factors weigh against doing so, and it may deny a minor
 20 role reduction even if some of the factors weigh in favor of granting a
 21 reduction. And because the factors set forth in the Amendment are non-
 22 exhaustive, a district court may also consider other reasons for granting or
 23 denying a minor role reduction

24 *United States v. Quintero-Leyva*, 823 F.3d 519, 523 (9th Cir. 2016).

25 The PSR declined to apply a mitigating role adjustment based on its conclusion
 26 that Mr. Paronyan “does not appear substantially less culpable than the average
 27 participant: he alone stood to benefit from the funding of his fraudulent loan
 28 applications; he alone applied for the EIDL loans and maintained full discretion in
 applying for the loans; and Paronyan exercised all decision making authority over two
 of the three loan applications.” (PSR ¶ 55.)

But this conclusion is incorrect for several reasons, and numerous of the
 applicable factors make clear that Mr. Paronyan qualifies for a mitigating role
 adjustment. Mr. Paronyan had very little knowledge, if any, of the scope and structure
 of the criminal conspiracy in this case, no role in planning or organizing it, no decision-
 making authority or influence, and his participation was tangential at best. The

1 criminal activity in this case involved a wide-ranging conspiracy by other defendants to
2 use fake and stolen identities and fake companies to fraudulently obtain PPP funds and
3 then launder them into real estate purchases. As the Court recognized in rejecting Mr.
4 Paronyan's first plea agreement, he was not a member of this conspiracy and did not
5 launder money. In contrast to the other defendants, Mr. Paronyan's fraudulent loans
6 were obtained in connection with a legitimate business and were used in part for
7 legitimate payroll expenses. Mr. Paronyan does not deny the wrongful acts he
8 performed and his own responsibility for them, but even the PPP loan he obtained was
9 processed by others, who exercised their own discretion in setting the fraudulent
10 amounts. The PSR focuses on the fact that Mr. Paronyan alone benefitted from the
11 loans, but even on that issue Mr. Paronyan's benefit was minor compared to the other
12 defendants. Mr. Paronyan received far less money than the other defendants, and spent
13 it far less exorbitantly. Whereas other defendants bought houses and watches with the
14 millions they stole, Mr. Paronyan used the several hundred thousand dollars he
15 obtained in part for legitimate payroll expenses and has admitted to using some of the
16 loan proceeds for improper purposes, primarily clothing and travel and other living
17 expenses. And he also loaned a significant portion of the proceeds to defendants
18 Ayvazyan and Terabelian, meaning they, not he, were the primary beneficiary. The
19 Court correctly recognized that this loan did not constitute money laundering, as Mr.
20 Paronyan expected to be paid back. Of course, Mr. Paronyan was never paid back by
21 these defendants, who have now fled following their own conviction at trial, but Mr.
22 Paronyan nonetheless will make full restitution for the loans he obtained. In contrast to
23 them, Mr. Paronyan has taken full responsibility for his misconduct, but his role was
24 minimal compared to them and every other defendant.

25 //

26 //

27 //

B. The Criminal History Category Overstates the Seriousness of Mr. Paronyan's Criminal History

Section 4A1.3 of the Sentencing Guidelines recognizes that there may be cases where “a defendant’s criminal history category significantly over-represents the seriousness of a defendant’s criminal history or the likelihood that the defendant will commit further crimes.” U.S.S.G. § 4A1.3(b)(1). As one court has explained:

‘Criminal history’ is, relatively, one of the most flexible concepts in the guidelines. While it is possible to classify the severity of current federal offenses with a reasonable degree of precision, mathematically accurate evaluation of the countless possible permutations of criminal history, involving offenses high and petty committed in numerous jurisdictions, would be at best unwieldy.

United States v. Adkins, 937 F.2d 947, 952 (4th Cir. 1991). As a result, a downward departure based on criminal history over-representation is allowable under this section.

The facts surrounding Mr. Paronyan’s criminal history warrant a departure in this case. Mr. Paronyan’s only prior convictions are for two misdemeanors. The first, for auto theft, involved an incident from over a decade ago when Mr. Paronyan worked at a wrecking yard, which, unbeknownst to him, had a stolen vehicle on the premises. (PSR ¶ 68.) Ultimately, Mr. Paronyan’s probationary sentence was terminated early and the court ordered his plea set aside, and a plea of not guilty entered, and the matter was dismissed. (*Id.*) This conviction accounts for one criminal history point. (*Id.*)

Mr. Paronyan’s only other conviction was for a DUI in 2018. (*Id.*, ¶ 69.) While admittedly serious and inexcusable, this conviction nonetheless has had an outsize and disproportionate impact on Mr. Paronyan’s criminal history. In addition to the two points it adds to his criminal history, Mr. Paronyan was also still on probation for one more year at the time he was charged in this case, which means this single misdemeanor conviction resulted in yet another two points being added to his criminal history. (PSR ¶¶ 69, 71.)

Here, these two convictions take on much greater significance than they should because they serve to increase Mr. Paronyan’s criminal history to 5 points. This results

1 in a criminal history category III, as opposed to II if he had 2 or 3 points. Such a
 2 dramatic change over-represents the seriousness of these prior convictions. As a result,
 3 Mr. Paronyan believes that the Court should find that category II is the appropriate one
 4 in this case.

5 Mr. Paronyan thus believes that a properly-calculated offense level is 12 and a
 6 properly calculated criminal history category is II, resulting in a sentencing range of 12-
 7 18 months and placing him in Zone C. Regardless, although the sentencing guidelines
 8 are the starting point for the Court's consideration of sentencing, Mr. Paronyan does
 9 not believe that the guidelines adequately address all of Mr. Paronyan's life
 10 circumstances, the circumstances of his offense, and the other punishment he has and
 11 will continue to suffer as a result of his offense.

12 **III. THE APPROPRIATE SENTENCE**

13 The core principles of sentencing have been resolved by the Supreme Court in
 14 *United States v. Booker*, 543 U.S. 220 (2005), *Gall v. United States*, 552 U.S. 38
 15 (2007), and *Kimbrough v. United States*, 552 U.S. 85 (2007). "The guidelines are not
 16 only not mandatory on sentencing courts; they are also not to be presumed reasonable."
 17 *Nelson v. United States*, 555 U.S. 350, 352 (2009). Factors justifying a sentence
 18 outside the guideline range are no longer required to be "extraordinary." *Gall*, 552 U.S.
 19 at 47. "One theme" runs through the Supreme Court's recent sentencing decisions:
 20 "*Booker* empowered district courts, not appellate courts . . . [and] breathe[d] life into
 21 the authority of district court judges to engage in individualized sentencing. . . ." *United*
 22 *States v. Whitehead*, 532 F.3d 991, 993 (9th Cir. 2008). Although the guidelines
 23 remain the starting point for the Court's consideration of Mr. Paronyan's sentence, Mr.
 24 Paronyan submits that they do not adequately address Mr. Paronyan's unique life
 25 circumstances. Mr. Paronyan submits that when the factors set forth in 18 U.S.C.
 26 § 3553(a) are considered, a sentence of probation or house arrest is sufficient, but not
 27 greater than necessary, to achieve the aims of sentencing.
 28

A. Mr. Paronyan's History and Characteristics

From a young age, Mr. Paronyan has faced substantial hardships but has overcome them to become a loving family man and a pillar of support to all who know him. While this does not excuse his actions in this case, it does provide a context in which to better understand his actions and it demonstrates that a significant downward variance is warranted.

Mr. Paronyan was born in Armenia in 1980 and enjoyed a stable childhood with his parents and younger brother until 1990, when the Soviet Union collapsed and uprooted his and his family's life. (PSR ¶¶ 77-80.) Mr. Paronyan was just ten years old, but he was left in Armenia for three years to take care of his mother, while his father and younger brother emigrated to Los Angeles. (PSR ¶ 80.) Armenia was in crisis, with little energy or basic consumer goods, and Mr. Paronyan had to venture into the woods to cut wood to keep himself and his mother warm and had to line up before dawn in the hopes of finding bread for himself and his mother. (*Id.*)

Mr. Paronyan and his mother were finally able to join his father and brother in Los Angeles after three years, but their financial circumstances were never the same as they had been, and ultimately the turmoil caused Mr. Paronyan's parents to divorce. (PSR ¶¶ 80, 83.) Mr. Paronyan only learned English upon enrolling in middle school, and has worked consistently since his early teenage years to help support his family. (PSR ¶ 81-82.) His younger brother, Zaven, describes the sacrifices Mr. Paronyan made for his family even at a young age:

Edvard had to grow up fast and be the man of the house when we left them behind. . . . His dream to play college football was cut short after 1 year at Valley College our parents went through a divorce and he was forced to drop out. He found a job and when I received scholarship to play football in college he supported me financially. He didn't let me quit and he put my dream and goals over his. He supported my mom also to get through the hard times. Because of his hard work I was the first in family to graduate college. (Letter of Zaven Paronian, Ex. 1)

After dropping out of college to support his family, Mr. Paronyan spent approximately a decade working in a junkyard and driving big rigs, before he decided

1 to start his own business, Redline Auto Collision, in 2013. (PSR ¶¶ 97-101.) During
 2 this time, Mr. Paronyan met his wife, Emily in 2005 and they wed in 2008, and now
 3 have two children, Christopher, 11, and Milanna, 6. (PSR ¶ 84.) As numerous letters²
 4 show, it is hard to overstate what an excellent husband and father Mr. Paronyan is:

5 He is smart and works very hard to make us happy and keep us safe.
 6 My dad has a very big heart and always takes care of everyone . . .
 7 My dad is the best dad in the world and I hope that he can stay with
 8 us forever. (Letter of Chris Paronian, Ex. 2)

9 There are not enough words to explain what an amazing, loving
 10 and caring person he is. He is so loved and respected from his family,
 11 friends and anyone that knows him. (Letter of Emily Ghazakhetsyan, Ex. 3)

12 undoubtedly one of the greatest fathers I have ever come across.
 13 Edvard is a devoted father who is always there for his children,
 14 emotionally and physically. Seeing how attentive and caring Edvard
 15 is with his children and all children is a breath of fresh air. My
 16 children love Edvard like a second father. (Letter of K. Avakyan, Ex. 8)

17 As devoted as Mr. Paronyan is to his family, he is equally devoted to everyone in
 18 his life, as dozens of letters demonstrate:

19 He is the closest thing I have to a brother. When asked who my family
 20 is I think of him. Edvard has been by my side through all the worst and
 21 best times of my life, from the loss of my mother, to the birth of my son.
 22 He is a wonderful man. . . . I hope to have the same relationship with my
 23 daughter as he does with his. The way they are bonded to each other is
 24 something out of a novel. (Letter of G. Bastrmajyan, Ex. 10)

25 My neighbor's house had caught on fire, I had no idea what was going on,
 26 I woke up to Mr. Paronyan banging on my door alongside firefighters to get
 27 me and my son out. I was confused and terrified. If it had not been for his
 28 calm and quick thinking I wouldn't have been able to get out of there safely.
 He had evacuated his family from the area and came back for us. That
 is something I can never thank him enough for. (Letter of T. Davtian, Ex. 11)

I know Ed's always there for me when I'm in need of guidance, His
 positivity is unwavering and his commitment to family is unmatched,
 I can honestly say that he is without a doubt one of the reasons I'm here
 today. . . The world needs more people like Ed. (Letter of Arman
 Gambaryan Ex. 15)

He has a genuine heart that will go above and beyond for someone he

² The examples discussed here are just excerpts of the dozens of letters submitted
 as exhibits along with this brief for the Court's reference. Many of the writers will
 attend Mr. Paronyan's sentencing. Rather than express himself in a letter, Mr.
 Paronyan intends to address the Court directly at sentencing.

1 loves and someone who is in need. (Letter of Ani Gambaryan, Ex. 14)

2 Honesty, hard work, pure soul, love, dedication and “coolness” is what
3 sums up Edvard . . . his two beautiful kids will miss not only him, but
4 his emotionally indispensable presence. His wife loves him in so out
of control way that I cannot even imagine how she is going to handle
his absence. (Letter of A. Ilangesyan, Ex. 19)

5 a generous, kindhearted and a loyal friend . . . I know in my heart Ed is
6 still a good man that is capable of learning from this experience and
becoming even a better person because of it. (Letter of E. Kang, Ex. 20)

7 a selfless father putting his children’s needs ahead of everyone else . . .
8 the person you want as a friend. He will always be there and help in
any way. (Letter of A. Karabeyan, Ex. 21)

9 It wasn’t until I met Edvard that I learned what it’s like to have an older
10 brother. For the first time in a long time, I was able to feel what it was
like to have someone watch out for me, to care for me, and to help me
with whatever issue came my way. (Letter of A. Kesishvan, Ex. 22)

11 Meeting Eddy, I was 13 or 14 and I remember from the very first
12 interaction how kind, sweet, and warm hearted he was, and how
comfortable he made me feel. He took time to get to know me. . . .
13 No matter how small, big, or embarrassing my issues may be I have
14 never felt anything but love and genuine care in his feedback. I am
now 30 years old, and to this day he is the one person I know I can
count on always to support me. (Letter of L. Khachatryan, Ex. 23)

15 My car broke down in the middle of the street. . . Edvard helped me
16 push my car to a safe area on the road. He was a complete stranger . . .
he helped me, no questions asked. (Letter of H. Kim, Ex. 24)

17 fine and responsible character . . . a business owner [] known for being a
18 dedicated husband and father . . . a reliable, trustworthy, and decent
person. (Letter of A. Nath, Ex. 26)

19 My uncle, Edwards father, lives alone and has many health problems,
20 Edvard [is] one of the most caring and dependable sons I have the pleasure
21 of knowing. My uncle always makes sure to thank Edvard for being his
lifeline. Always making sure he has food to eat for the week, has a ride
22 to his doctor’s appointments. Edvard has showed to be a critical part of his
father’s life and is ready to lend a hand anytime he is needed. (Letter of S.
Pembedjian, Ex. 27)

23 a loyal friend, a motivator, and a helping hand . . . spreading positivity
24 wherever he went . . . he truly has a heart of gold. (Letter of A. Polaydan,
Ex. 28)

25 After her husband died suddenly, “Edvard spent everyday being there
26 for my children as an uncle to make sure they grieve and have a male
figure in their lives. He helped me grieve by being my by side everyday
27 and making sure I am able to hope again. He continues to be the supportive
friend as I continue to heal. (Letter of M. Tsotsikyan, Ex. 29)

B. Circumstances of the Offense

Mr. Paronyan's offense involves three loans he obtained for his business, Redline Auto Collision, during the Covid-19 pandemic in the spring and summer of 2020. (PSR ¶¶ 31-39.). Although Mr. Paronyan knowingly obtained more PPP and EIDL loan proceeds than his business was actually entitled to and did not use all the proceeds as required for his business, the primary reason he sought the loans was so that he could continue paying his employees during the pandemic. Mr. Paronyan accepts responsibility for his unlawful conduct in connection with the loans, but believes that his initially legitimate purpose in seeking the loans is a significant mitigating factor, consistent with his exemplary character as described above. For example, many of the letters that describe Mr. Paronyan's work ethic and loyalty also specifically discuss his attempts to keep his employees employed during the pandemic:

Through his positivity, perseverance and hard work he grew that business to 10 times the size where he started. He is definitely a very successful businessman. Some of success is owed to his caring a loving persona. It is more fitting to describe his relationship with his staff as family than as employees. (Letter of Y. Ghazakhetsyan, Ex. 17)

During pandemic when his business was struggling he made sure everyone that works for him had money to put food on their tables. Pandemic changed everyone's life, but my husband made sure to protect and take care of his work family as well. (Letter of E. Ghazakhetsyan, Ex. 3)

His business went through hard times during Covid and he didn't let go any of his employees even though he was losing money he didn't want to impact them and their families. (Letter of Z. Paronian, Ex. 1)

He is a great boss. He cares about his employees and treats them as We are a family. During the difficult times, when pandemic started, the business was very slow, we were hearing businesses closing left and right, but Edvard was doing his best to pay his employees on time and making sure were all doing well. (Letter of A. Yakhszyan, Ex. 30)

C. The Need to Provide Just Punishment

Probation is a just punishment in this case for at least two unique reasons. First, Mr. Paronyan has already suffered reputationally and financially since his arrest. Second, Mr. Paronyan is almost certain to be deported back to Armenia, where has not lived since he was ten years old, as a result of his conviction in this case.

1 First, given Mr. Paronyan's reputation in the community, as recounted above, his
 2 mistake in this case has already cost him his standing in the community and caused
 3 humiliation, stress, and financial hardship. These are factors the court should consider
 4 in fashioning an appropriate sentence. *See United States v. MacKay*, 20 F.Supp.3d
 5 1287, 1297 (D. Utah 2014), *aff'd*, 610 F. App'x 797 (10th Cir. 2015) ("[R]ecognizing
 6 that the sentence imposed on MacKay must be just, the Court does not entirely
 7 disregard the considerable negative impacts this case has already had on him and his
 8 family. He has already lost standing in his community, faced the humiliation of a public
 9 trial, lost his job, spent a great deal of money on his defense, and otherwise experienced
 10 major financial setbacks, and has no doubt suffered many emotional pains and negative
 11 health consequences that accompany such a process"); *United States v. Gaiind*, 829 F.
 12 Supp. 669, 671 (S.D.N.Y. 1993) (granting downward departure where defendant was
 13 punished by the loss of his business); *United States v. Vigil*, 476 F.Supp.2d 1231, 1235
 14 (D.N.M. 2007) (finding variance appropriate where defendant was collaterally punished
 15 by loss of his position and reputation and widespread media coverage).

16 Consistent with his character, Mr. Paronyan has taken responsibility for his
 17 mistake and has spoken openly about it with his community, sharing his remorse and
 18 using his own mistake to encourage others to do better:

19 The fact his kids got to see his Dad being arrested at the house was
 20 when he realized how he let his family down. Edvard has always
 21 bounced back when things have not gone right and his ready and
 has been working towards that since he was arrested. (Letter of Z.
 Paronian, Ex. 1)

22 In a million years, I could not have imagined Edo doing the wrong
 23 thing or hurting a fly. I am not sure in what state of desperation he
 24 must have been in, to much such a wrong decision. . . . Even with
 this sad situation, till this day he is super positive and encouraging.
 He motivates all the young kids in our family to make the right
 25 decisions in life. The other day, he pulled my 14 year old daughter
 aside and said, "Higher Education is so important in life" I wish I
 26 had such an education I would have thought twice before making a
 rush or stupid decision." (Letter of H. Arutunyan, Ex. 5)
 He understands that his actions/decisions involved in this case
 27 were not right. He deeply regrets the actions he took. (Letter of M.
 Artunyan, Ex. 7)

1 He has shared the details of his case and clearly feels the shame and
 2 pain of this mistake that has put him and his family in the current
 3 situation. . . . There is no doubt he has made the biggest mistake
 of his entire life and his entire family will be sharing in the punishment
 with his absence. (Letter of S. Yi, Ex. 31)

4 Second, Mr. Paronyan is a permanent resident of the United States, but not a
 5 citizen, unlike the rest of his family. By virtue of this felony conviction, he will likely
 6 face removal proceedings to Armenia, where he has no relatives and has not lived since
 7 he was ten years old. (PSR ¶ 87.) This is a severe consequence, which Mr. Paronyan
 8 accepted in pleading guilty and taking responsibility for his offense. It is also a
 9 significant mitigating factor in considering the amount of imprisonment necessary to
 10 punish. *See United States v. Mendez-Velarde*, 798 F. Supp. 2d 1249, 1257 (D.N.M.
 11 2011) (varying downward eighty months for myriad reasons, including defendant's
 12 deportation following his sentence); *Jordan v. De George*, 341 U.S. 223, 232 (1951)
 13 (Jackson, J., dissenting) (deportation is "a life sentence of banishment in addition to the
 14 punishment which a citizen would suffer from the identical acts.").

15 **D. The Need to Avoid Unwarranted Sentencing Disparities**

16 In addition to being less culpable than the other defendants in this case, Mr.
 17 Paronyan is also less culpable than other defendants who have been sentenced for PPP
 18 fraud both in terms of the total amount of money obtained and the fact that he did in
 19 fact have a legitimate business. A downward departure therefore also is warranted to
 20 avoid disparities with the sentences other PPP fraud defendants have received. *See*,
 21 *e.g.*, *U.S. v. Trosin*, No. 20-CR-4066 (N.D. Iowa), Dkt. 73 (40-month sentence for \$1.3
 22 million PPP and EIDL fraud scheme); Florida (33-month sentence for over \$7 million
 23 PPP fraud scheme); *U.S. v. Tezna*, No. 21-CR-77 (E.D.V.A.), Dkt. 19 (18-month
 24 sentence for \$350,000 PPP fraud scheme based on nonexistent payroll expenses); *US*.
 25 *v. Johnson*, No. 21-CR-60017 (S.D. Fla.) Dkt. 54 (18-month sentence for \$389,627 PPP
 26 loan scheme); *U.S. v Walker*, No. 20-CR-60159 (S.D. Fla.), Dkt. 13 (12 months and a
 27
 28

1 day sentence for \$258,575 PPP loan scheme for legitimate company but inflated payroll
2 numbers).

3 **E. A Lengthy Prison Term Is Unnecessary to Deter Mr. Paronyan**

4 Section 3553(a)(2) requires courts to consider the need for a sentence to prevent
5 a defendant from engaging in future criminal conduct or endangering society. *See* 18
6 U.S.C. § 3553(a)(2)(B)-(C). In this vein, Congress has advised that “sentencing
7 decisions should be designed to ensure that prison resources are, first and foremost,
8 reserved for those violent and serious criminal offenders who pose the most dangerous
9 threat to society” *See* Pub. L. No. 98-473, § 239, 98 Stat. 1987, 2039 (1984) (note
10 to 18 U.S.C. § 3551). The empirical facts show that Mr. Paronyan poses virtually no
11 threat of recidivism or danger to society. As a married 40-year-old, Mr. Paronyan is
12 among the offenders least likely to recidivate in the entire criminal justice system. *See*
13 U.S. Sent’g Comm’n, *Measuring Recidivism: The Criminal History Computation of the*
14 *Federal Sentencing Guidelines* at 7, 12-13 & Exs. 2, 9- 11 (2016). This is particularly
15 true given the nature of Mr. Paronyan’s offense. *See* *Measuring Recidivism*, *supra*, at
16 Ex. 11 (first-time fraud offenders least likely to recidivate); David Weisburd, et al.,
17 SPECIFIC DETERRENCE IN A SAMPLE OF OFFENDERS CONVICTED OF
18 WHITE COLLAR CRIMES, 33 *Criminology* 587 (1995) (finding no difference in the
19 deterrent effect of prison and probation for white-collar offenders); Zvi D. Gabbay,
20 *Exploring the Limits of the Restorative Justice Paradigm: Restorative Justice and White*
21 *Collar Crime*, 8 *Cardozo J. Conflict Resol.* 421, 448-49 (2007) (finding “no decisive
22 evidence” supporting “conclusion that harsh sentences actually have a general and
23 specific deterrent effect on potential white collar offenders”). Mr. Paronyan has
24 accepted responsibility for his conduct during the pandemic, has already felt the effects
25 of his mistake on his business, family, and community, and faces deportation. A term
26 of imprisonment is unnecessary to deter him.

1 **F. A Lengthy Prison Term Would Delay Restitution for the Victims**

2 Mr. Paronyan took responsibility early on in this case for his misconduct and
3 plans to make full restitution. (PSR ¶ 88.) He plans to do so by continuing to work at
4 Redline Auto Collision, which he will not be able to do if he is imprisoned. A lengthy
5 term of imprisonment would therefore delay restitution, which further justifies a
6 downward departure.

7 **IV. CONCLUSION**

8 Based on the foregoing, Mr. Paronyan respectfully requests that the Court
9 impose a sentence of probation or house arrest.

10 Respectfully submitted,

11
12
13 DATED: September 13, 2021

By /s/ Michael G. Freedman
MICHAEL G. FREEDMAN
Attorney for Defendant
Edvard Paronyan

Ex. 1

Letter of Zaven Paronian

The Honorable Stephen V. Wilson

First Street Courthouse,

350 W, 1st Street

Los Angeles, CA 90012

Zaven Paronian (Brother of Edvard)

10119 Riverside Dr

Toluca Lake, CA 91602

Dear Judge Wilson:

I'm sending this letter requesting leniency on behalf of Edvard Paronyan, hope you read my letter to have a better understanding of Edvard Paronyan.

Edvard Paronyan was the best older brother I could have asked for. From young age he protected me and lead by example. Edvard was 3.0 plus GPA student in High School and stand out football player where he was all conference offensive and defensive lineman

1. In 1989 My dad and I left Armenia to come to America leaving behind Edvard and my mom
2. Armenia became impendent after Soviet Union crash we lived on the 12th floor with no electricity or heater. Edvard had to grow up fast and be the man of the house when we left them behind.
3. Back in late 90s and 2000s Hollywood High School had issues with gangs, and ethnicity fights. Edvard was in the middle of all those ethnicity fights between Armenian Vs. Mexicans bringing everyone together. He used his status of being a star football player and his popularity in a positive way. Being friends with both side he understood the importance bringing everyone together.
4. His dream to play college football was cut short after 1 year at Valley College our parents went through a divorce and he was forced to drop out. He found a job and when I received scholarship to play football in college he supported me financially. He didn't let me quit and he put my dream and goals over his. He supported my mom also to get through the hard times. Because of his hard work I was the first in family to graduate college.

5. Edvard is happily married and with two kids 6 and 11 years old. His always been there for his kids and being the sole provider for the family since day one. His kids need him more than ever now.
6. His business went through hard times during Covid and he didn't let go any of his employees even though he was losing money he didn't want to impact them and their families.

Edvard is loved by all his friends and family because of his big heart and he will be the first to tell you that he is sorry for what he did and takes full responsibility of his actions. The fact his kids got to see his Dad being arrested at the house was when he realized how he let his family down. Edvard has always bounced back when things have not gone right and his ready and has been working towards that since he was arrested. I ask you to please consider keeping him with his family and give him house arrest. As the sole provider for his family and 5 employees who have families need him.

A handwritten signature in black ink, followed by the date "8/20/2021". The signature is stylized and cursive.

Ex. 2

Letter of Chris Paronian

Hi my name is Chris Paronian. I'm Edvard Paronyan's son. I live with my dad, mom, sister and 2 dogs. I want to tell you a little about my dad. He is smart and works very hard to make us happy and keep us safe. My dad has a very big heart and always takes care of everyone. I love playing video games with him and swimming in the pool. Our favorite thing to do together is going fishing but this year we couldn't go. I am hoping soon he will be able to take me . My dad is the best dad in the world and I hope that he can stay with us forever .

Ex. 3

Letter of Emilyya Ghazakhetsyan

My name is Emilyya Ghazakhetsyan. I am writing you today on behalf of my husband Edvard Paronian who is scheduled to appear in your court for sentencing on September 27th .I have known Edvard for over 15 years and been married to him for over 13 years. We have 2 beautiful children . Our son Christopher is 11 years old and looks up to his dad so much. And our daughter Milana is 6 years old and her daddy is her idol and hero. My husband is our family's sole provider. I can tell you that he is a good person, an intelligent and driven man, and by no means a danger to society. He is one of the most hardworking and loyal man I know. He is loving ,caring and forgiving. We had a lot of ups and downs in life but he always worked so hard to make sure his family was taking care of. He also is an amazing boss who would do anything for his employees. During pandemic when his business was struggling he made sure everyone that works for him had money to put food on their tables. Pandemic changed everyone's life , but my husband made sure to protect and take care of his work family as well. There are not enough words to explain what and amazing, loving and caring person he is . He is so loved and respected from his family , friends and anyone that knows him.

I respectfully ask Your Honer to take these words into consideration when sentencing him, I beg to Your Honer to give him a second change to prove himself and that Your sentencing be merciful . Please take into account all the people whose lives he has touched who will miss him, and especially how his absence will affect the lives of our children.

Ex. 4

Letter of Susanna Apoyan

Honorable Judge Wilson,

I am writing to you in regards to Edvard Paronyan. I am Susanna Apoyan, the relative person of his family. I am full time worker for grocery store and full-time student of university. I have known Edvard Paronyan and his beautiful family for several years. He is a very humble and respectful man. He always motivates everyone to be a better person. He is a very caring, loving, happy, respectful family man and father. Thank you.

Respectfully submitted,

Susanna Apoyan

Ex. 5

Letter of Helena Arutunyan

Helena Arutunyan

2631 N. Myers St.

Burbank, CA 91504

Re: Edvard Paronyan

Dear Honorable Wilson-

My name is Helena Arutunyan. I am a forty year old women with two kids and a loving husband of 18 years. I have an accounting degree from California State University of Northridge and an MBA from Woodbury University. I have been working as a senior account for The Walt Disney Company for over fifteen years and currently manage a Law Firm in Glendale California.

I am writing to you to inform you about a dear friend of mine, Edvard Paronyan, A.K.A. "Edo" who I know from over twenty years now. I met Edo in 1998 in Hollywood High School where I was the ASB President and he was the Homecoming King. Edo was always fast on his feet and super nice and helpful to all our friends in high school. He was never the typical "jock", he always went out of his way to help or protect the ones he cares about. Edo was raised by his single mother. At a very young age he became the man of the house for his younger brother. He always worked and supported his mom and brother and completely forgot about himself.

In 2003, Edo met my beautiful cousin, Emily and fell in love and got married in 2008. They created a beautiful and loving family with two beautiful kids, Chris (11 years old) and Milana (6 years old). My cousin is a housewife while Edo works really, really hard to make sure his family has a comfortable living. He runs a very successful body shop, working long hours for his loving family. In 2018, Edo and my cousin purchased their house in Granada Hills California where we had a huge celebration for his hard work and success. During the Covid Crisis, Edo panicked because he had all these responsibilities and due to the Pandemic, business was extremely slow and he truly went into a dark place.

A little about my dear friend Edo. He is an amazing HUMAN being. Everyone who had some sort of interaction with him, will absolutely second that fact about him. A few months ago, my son who is 12 and recently started getting into jewelry complemented Edo on a bracelet, and Edo took out the bracelet at that moment and gifted it to my son. This is the kind of person he is and he truly has a heart of

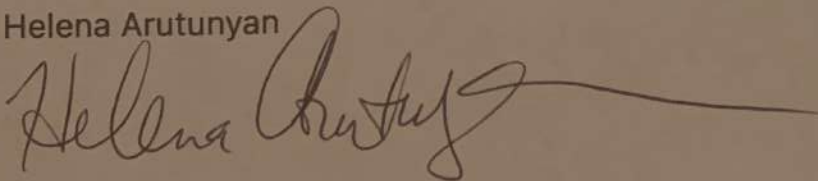
gold. He is NOT a criminal. I understand what he did was not just to the society and people need to be punished for the unjust decisions but Edo is a JUST human being to the society. He pays his taxes, he employs multiple individuals and he LOVES United States of America! He is a loving husband, father, and an unbelievable friend. Regardless of his financial situation, he is always willing and ready to help the ones around him. We were great friends all throughout our teens and twenties and for over the past ten years I am lucky to call him my brother!

My family and I were in disbelief when we heard about Edo's legal matters. I am so sad and lost for words because of this letter. In a million years, I could not have imagined Edo doing the wrong thing or hurting a fly. I am not sure in what state of desperation he must have been in, to make such a wrong decision. PLEASE have an open mind and an OPEN heart when sentencing my dear brother. Please don't take him away from his beautiful family. He and his family truly don't deserve it. Even with this sad situation, till this day he is super positive and encouraging. He motivates all the young kids in our family to make the right decisions in life. The other day, he pulled my 14 year old daughter aside and said, "Higher Education is so important in life" I wish I had such an education I would have thought twice before making a rash or stupid decision.

Your Honor, my brother Edo admits his wrong doing and is truly sorry and is ready and willing to carry whatever sentence you may give him. On the other hand, his family, friends, employees and his surrounding believe he deserves a second chance in life to correct wrongdoings and be a better citizen for his family, friends and entire community.

Sincerely,

Helena Arutunyan

A handwritten signature in dark ink, appearing to read 'Helena Arutunyan', with a long horizontal flourish extending to the right.

Ex. 6

Letter of Maria Arutunyan

Dear Judge Wilson,

Thank you for taking the time to read my letter. I am writing in regards to Edvard Paronyan. My name is Maria Arutunyan, and I am a long time family friend of Edvard. I am married to his friend who he has grown up with since the 90's. I met him through my husband in 2001 and we have been good friends since.

Edvard is not only a good friend, but also an amazing father, husband and son. He is honest, hard working, loyal and always there for everyone that he can help. We consider him our brother. We feel blessed to have him in our lives and to have made many memories with him and his family. We are truly heart broken that Edvard is in this situation. The thought of him being away from his wonderful family, especially his children who are so attached to him is just devastating. He has a very special bond with both his children from helping them with their homework to tucking them eat at night. We are praying for Edvard to be with his family and to be given another chance. We have faith in him and we want you to know that nothing like this will ever happen again. As with all human beings, no one is guaranteed to make perfect choices all the time. We all pray that we will have a chance to make ourselves better and we can become better for us and everyone around us. We ask for that chance for him.

Thank you again. Have a blessed day.

-Maria Arutunyan

Ex. 7

Letter of Mher Arutunyan

Mher Arutunyan, EA
17034 Septo St
Northridge, California 91325
818-903-6805
mher@capitalfn.com

August 20, 2021

Re: Edvard Paronyan

Dear Judge Wilson,

My name is Mher Arutunyan, and I am an Enrolled Agent with IRS (00104276). Mr. Paronyan and I have known each other over 15 years and he is married to my first cousin. Other than Mr. Paronyan being married to my cousin, I also prepare and file his family's yearly tax returns, his business' quarterly tax return and most of his accounting needs.

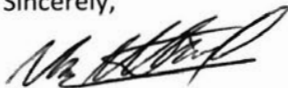
Over the years, Mr. Paronyan has proven to be a very fine and responsible individual. Mr. Paronyan, owning and operating a very busy and successful auto body shop, is known to be very dedicated husband and a father. As a character Mr. Paronyan is very reliable and very much respected by his family and friends. Regardless how busy his job becomes Mr. Paronyan always finds time to spend it with his children and the wife. Mr. Paronyan makes sure that his family is always his first priority.

Other than time spent with his wife and two children, Mr. Paronyan finds time to help and be a good/loyal friend. Mr. Paronyan is a great mentor and a role model, who has a good judge of character.

Mr. Paronyan has made me aware of the case that he is facing now. He understands that his actions/decisions involved in this case were not right. He deeply regrets the actions he took. Being the main provider for the family, hopefully the judgment will be monetary.

Thank you for taking the time to read this letter,

Sincerely,

A handwritten signature in black ink, appearing to read 'Mher Arutunyan', with a stylized flourish at the end.

Mher Arutunyan, EA
00104276

Ex. 8

Letter of Katherine Avakyan

Dear Judge Wilson,

My name is Katherine Avakyan and I have spoken with Edward about his case and Edward explained what he has done and that he will be sentenced in the near future.

My husband, Ashot Keshishyan has also written a letter regarding our dearest Edvard. I am a 35 year old mother of three and a paralegal, though I have taken time off from my career to care for my children. My relationship with Edvard grew once I started dating Ashot, however I first met Ed when I was about 13 years old, as he is cousins with my best friend Suzie.

Growing up with Suzie was an exciting experience. Suzie and I are amongst a group of twelve best friends who have remained friends for over 25 years! I take pride in the longevity of our friendship, as it quickly grew to more than just a friendship, but a sisterhood where all of our children are now best friends with one another. As teenagers, Edvard would watch over Suzie and I all the time and always made sure we were safe and happy. I remember one hot summer day when Suzie and I were walking home from summer school and Edvard "happened" to be driving by at that exact same time. To no surprise, Edvard drove us home safely that day and every other day for the remainder of our summer session. This is just one small example of how large Edvard's heart is. As a mother, I aspire for my children to grow up and befriend people like Edvard, people who would go the extra mile for their friend without expecting anything in return.

Edvard is not only an amazing cousin to my friend Suzie and an amazing friend to me and my husband, but he is undoubtedly one of the greatest fathers I have ever come across. Edvard is a devoted father who is always there for his children, emotionally and physically. Seeing how attentive and caring Edvard is with his children and all children is a breath of fresh air. My children love Edvard like a second father. Ever since my son Ben was about 2 years old he would get Edvard to carry him and dance across the room. Edvard truly is a unique human with one of the kindest hearts.

Though it is with great sadness that Ed will have to say his farewells to his children and to my children, I pray that you take the above references into consideration during sentencing. Thank you for your time.

Best Regards,

Katherine Avakyan

Ex. 9

Letter of Serine Ayvazyan

Dear Judge Wilson,

I am Serine Ayvazyan, a licensed insurance agent. I work at State Farm insurance as an insurance producer. In this letter I want to speak about Edvard Paronyan's personality traits and I truly hope it will help you get an impression of his character. Edvard Paronian is my childhood friend's husband and I have known him for about fifteen years. First, I would like to describe Edvard as a parent, because his parenting skills have always been outstanding. The bond that he has with his children is hard to describe. He is a loving and caring father, who has active participation in the process of bringing up his children. Through these years, I have witnessed how he took care of his two children by always being there for them. He travelled with them to help them explore the world surrounding them, trained with them, as his son loves playing basketball, and his daughter loves to swim. Recently Emily (Edvard's wife and my best friend) had to take care of her mother in the hospital, as she has gone through a life threatening surgery. I was amused how Edvard, all by himself, took such good care of his children, as it was really hard for all of them to be apart for almost a month.

Next, I want to describe Edvard as a husband. Through all these years he was a responsible and very committed husband for Emily, always there through good and also tough times. He has always been very respectful and attentive towards his wife, and always worked hard to provide for his family.

Finally, I want to describe Edvard as a friend. He is the kind of friend that is always there when you need him, a very cheerful person to be around, and the spirit of the company. But most of all, I know I can always rely on him during difficult times.

None of these words are exaggerated to a single degree. Edward is a man of good heart, who is loved and respected by all.

Best Regards,

--

Serine Ayvazyan

Ex. 10

Letter of Gevork Bastrmajyan

Dear Jude Wilson,

I, Gevork Bastmajyan am writing this letter for my friend and now brother Edvard Paronyan. He and I have known each other for 30 years. He is the closest thing I have to a brother. When asked who my family is I think of him. Edvard has been by my side through all the worst and best times of my life, from the loss of my mother, to the birth of my son. He is a wonderful man.

I travel a lot for work and constantly have to leave my wife and son home alone. I feel reassured leaving them knowing. Edvard is right down the street ready to help at any moment. He has guided me through difficult personal and work choices I am so thankful for.

Edvard is also a wonderful family man. He is devoted to his wife and children. He is always planning activities with them and making sure his friends do the same with their families. Even now in his difficult time he does not allow anyone to see it. He is a great father figure, I hope to have the same relationship with my daughter as he does with his. The way they are bonded to each other is something out of a novel.

Edvard has been a wonderful son figure to my dad as well. Despite my father having so many others around him he can call his first phone call after me is to Edvard. He makes sure my dad is okay and taken care of. He lives alone so Edvard does his best to make sure he has food in the fridge and all of his affairs are in order. Despite having parents of his own and he takes the time to drive him to and from doctor appointments when I am unavailable.

I thank you for taking the time to read this letter and I hope you'll take into consideration what a great

human being Edvard is.

-Gevork Bastmajyan

Ex. 11

Letter of Tina Davtian

Dear Judge Wilson,

My name is Tina Davtian, I am a 3rd year medical student at Keck Medicine of USC. I am writing this letter for my dear friend Edvard Paronyan. He and I have know each other for over 12 years, he has become part of my family. Edvard has been a great supporter in my difficult journey to becoming a doctor. He has helped me study for exams and given me the motivation I needed to continue. Not to mention he has become one of the best and most reliable babysitters for my 4 year old son. He's there anytime we need him. These days those are very hard to come by. Two years ago we decided to pack up and move to Granada Hills to be closer to Edvard and his family because we rely on them so much.

Last year during the terrible brush fires of Granada Hills, my husband was out of the country and I was home alone asleep with our son when they started evacuations. My neighbor's house had caught on fire, I had no idea what was going on, I woke up to Mr. Paronyan banging on my door alongside firefighters to get me and my son out. I was confused and terrified. If it had not been for his calm and quick thinking I wouldn't have been able to get out of there safely. He had evacuated his family from the area and came back for us. That is something I can never thank him enough for.

My family is not the only one who values and loves him so dearly. He is a pillar of strength for many people. He is loved and treasured by those who know him. He's the kind of man the community needs. He is the kind of friend we all need in our lives. I say with great certainty that we will all suffer a great loss if he is not around, even for a short period of time. I hope you'll take this letter into consideration. Thank you.

-Tina Davtian

Ex. 12

Letter of David Dermenjian

David Dermenjian
11980 Wood Ranch Rd.
Granada Hills, Ca 91344

Honorary Judge Wilson,

My name is David Dermenjian and I am writing this letter in regards to Edward Paronyan. I am 53 years old, happily married and a father of three beautiful daughters. I am the owner/CEO of Bakersfield Community Healthcare located in Bakersfield, California. Bakersfield Community Healthcare consists of Home Health, Hospice and Adult Day Healthcare Center and has over 55 employees and has been in business since 2012.

I've known Edward Paronyan for little over 20 years, as he is a cousin of my wife. Edward and I did build a very close relationship, as he is a very down to earth, smart, respectful, good parent to his kids, family man and trustworthy individual. I did watch him grow, get married and build a beautiful family. My wife and I have left our kids to stay with Edwards family on several occasions when we left the country on vacations. My family and I feel fortunate to have Edward in our family.

I have had several long conversation with Edward about his current situation with the law as he is waiting to be sentenced. In my 33 years of living in US, I have never had issues with the law and I take big pride in it. This is the first time I am writing a letter in this character. Edward looks up to me and takes my words very serious. He considers me like an older brother to him. I am not going to talk about Edwards business, employees as I don't know too much about it. I have visited his shop several times and no one seemed to be complaining.

I prefer not to get into details of the case, as I am not the prosecutor nor the defense attorney on the case or about his sentencing that's coming up, as it is truly in your hands as a Judge. All I would ask of you is be gentle on him, he is a good man and his two kids need him buy their side.

Dear Judge, If the need arrises, I am ready to come in anytime and discuss with you and put in good word for Edward.

I am available any time if you need me to stop by and talk to you. I can be contacted at (818)400-2300.

Honorary Judge Wilson,
I thank you very much for reading my letter.

Thank you,
God Bless You and our country of USA.

Sincerely, David Dermenjian

Ex. 13

Letter of Christine Gabrielian

August 19, 2021

Christine Gabrielian
17034 Septo St
Northridge, CA 91325
Cell: 818-970-6804
Email: cgabrielian@gmail.com

Re: Edvard Paronyan

To: Honorable Judge Wilson

Dear Judge Wilson:

My name is Christine Gabrielian and I have known Edvard Paronyan for over 15 years, since he was a young man dating my cousin Emilia, whom he eventually courted to marriage and formed a beautiful family. Over the years, it has been a privilege watching Edvard be an amazing, devoted husband and father to his young children.

I am writing this letter hoping you will see Edvard the same way that I see him, which is responsible, caring, loving, devoted, hardworking man that he is. He devotes a lot of time to his work but never neglects to spend time with his children, wife, family and friends. He takes an active role as a father and husband and is always present and supportive. Regardless of how busy he may be, you can always count on Edvard to be there when you need him most. When I was in a car accident late in the evening, even though he had already left work, he came to my rescue and made sure that my car was towed for further assessment since it was not drivable, and I got home to my family safely. Edvard is always there at your most dire time of need.

I am asking for you to please see him not by a case number but rather by the human being that he is. His family, especially his young children need him. If he must be punished for any wrongdoing please translate it into monetary retribution, but I am pleading with you not to take him away from his active role as a father and husband.

Thank you from the bottom of my heart for taking the time to read my letter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Christine Gabrielian', with a large, stylized flourish at the end.

Christine Gabrielian, Pharm.D., A.Ph.

Ex. 14

Letter of Ani Gambaryan

Honorable Judge Wilson,

The purpose of this letter is to provide a character reference for Mr. Edvard Paronyan whom I have known as a brother/family for over 10 years. One word that would describe Edvard Paronyan is, caring. He has a genuine heart that will go above and beyond for someone he loves and someone who is in need. He's a hard working man that provides for his family. He's a devoted husband and an amazing father to his two beautiful children. Edvard is loved man by his family and friends. Wherever he is, his cheerful character captivates the people around him. His positive energy is something his family and friends would not want to miss. I trust you will take this letter into consideration as you determine the resolution of the matter before you.

Sincerely,
Ani Gambaryan

Sent from my iPhone

Ex. 15

Letter of Arman Gambaryan

August 19, 2021

Arman Gambaryan
1144 N Edgemont st.#2
Los Angeles, CA 90029

Dear Honorable Judge Wilson,

I'm Arman Gambaryan. I own a small business in Van Nuys that provides for my growing family. I've known Edvard Paronyan (or as I call him, "Ed") since I was a sixteen year-old kid. Ed, quickly became family in no time.

I'll try to keep this short. Trying to fit Ed into a few paragraphs is not an easy thing to do. I should probably start with his sense of humor because that's one of the first things I noticed about him, He's always up for a laugh or corny joke. No matter the situation his spirit is up high! I then have to mention what a determined and dedicated dad he is to his kids; what a great husband he is to his wife; and what a solid big bro he's been to me.

When my life was in the pits and I was struggling with my depression, I knew Ed cared. If it wasn't a phone call every week, it was a funny video he found on YouTube. He would always check in on me. It's sometimes the little things people do that help us get through our day to day. I know Ed's always there for me when I'm in need of guidance, His positivity is unwavering and his commitment to family is unmatched, I can honestly say that he is without a doubt one of the reasons I'm here today.

P.S. The world needs more people like, Ed.

- Arman G.

Ex. 16

Letter of Narine Gambaryan

Honorable Judge Wilson,

I am writing to you in regards to Edvard Paronyan and I just want portray what kind of role he plays in life. I am Narine Gambaryan, the sister in law of his wife. I am currently a stay at home mother of a beautiful little girl and another on the way. Edvard was the best man at my wedding and his wife Emily was maid of honor. They continue to be Godparents to our children. I have known Edvard for 10 years, I remember the day I met him and Emily, it felt as if I had known him all my life. He is the kind of man that wears his heart on his sleeve and it shows from the instant you meet him. He made sure I felt apart of the family from day one, he even let my husband know in front of everyone (50 plus people) that he approved of me and that I was a keeper. From that day on we became a family not from when I got married but from that very first day we met. He has been there for my husband and I through our toughest times. He would take time away from work and his kids to sit there and listen to us and give us guidance in our relationship. Edvard loves to be surrounded by his family and friends. He is always doing barbecue and calling us over for family time. He is the ultimate family man that everybody loves and respects. He is such a positive energy to be around. Edvard is the man everybody goes to when they need to be lifted or just need some words of encouragement and some positivity. He wanted us to start a family since the second we were married. When we had our little girl he was so ecstatic he said okay now try for baby number two. My daughter views him as gentle giant. She loves her godfather and loves to fall asleep in his arms. He is the most giving man I know, he gives without waiting for anything in return. When I wanted to start my career as a makeup artist he said do it without thinking twice and he gave me the money I needed for my courses. My entire family, my father my mother my siblings my aunts and uncles and cousins all love Edvard. He is definitely one of a kind and it breaks my heart the thought of not being able to see him for some time. He is an amazing husband and father of two beautiful children that love and look up to him. He is his daughters hero. In fact he is everybody's hero. Please find it in your heart to give him leniency in his sentencing. Thank you. Respectfully submitted,

Narine Gambaryan

Ex. 17

Letter of Yurik Ghazakhetsyan

Honorable Judge Wilson,

I am addressing this letter in an attempt to depict Edvard Paronyan for who he is. My Name is Yurik Ghazakhetsyan, I own a small State Farm Insurance agency in North Hollywood. My relationship to Edvard goes a long way as I have known him for over 14 years. Edvard is married to my sister and quite frankly I could not ask for a better person to be next to my sister. Edvard was also the best man at my wedding along with my sister as maid of honor. In addition, they are the godparents to our beautiful daughter Eliana and her sister who is due be welcomed this December. Not to mention he is also a dear friend. Edvard has always been a pillar for those around him. Enough cannot be said about this man. Through thick and thin his always been the same loving, positive, caring and supportive individual. His always been hardworking, since the first day he opened his Collision center some years ago, in a small 800sqft facility. Through his positivity, perseverance and hard work he grew that business to 10 times the size where he started. He is definitely a very successful businessman. Some of success is owed to his caring a loving persona. It is more fitting to describe his relationship with his staff as family than as employees. Most importantly, he is an amazing husband and an amazing father to two beautiful children. It's safe to say that his two kids and his wife are the center of his universe. If at all possible, please consider these facts at his sentencing hearing.

Regards,

Yurik Ghazakhetsyan

Ex. 18

Letter of Rita Hagopian

Dear Judge Wilson,

My name is Rita Hagopian; I am a local business owner for the past 15 years and I have known the defendant, Edvard Paronyan, since 2015. For the past 6 years, I have gotten to know him very well and can say with the utmost confidence that he is a loving, warm, caring, and compassionate individual.

When I first met him, I was going through some very difficult times, and he not only helped myself but my kids as well, feel safe and loved. His laugh is infectious and would always brighten our room and help keep us all focused on the good in life rather than all the negative. As our families got closer and closer we would go on vacations together and he became a part of our family. He loves my children like his own and is the best uncle possible. They absolutely love being around him. He is so considerate as a parent and friend. You never have to worry about needing a friend to help in any situation. He will always be there to help out.

Every weekend we are together for barbeques, birthdays, or just to watch the Lakers. He is a homely, good man and gives back to the community. He loves his Armenian roots which he is very proud of, always tries to help his community and the school his kids attend. He employs multiple individuals at his place of business and helps keep food on those families' tables.

Edvard is extremely conscious of people's feelings and wants to help anyone when they are down. He is an amazing cheerleader for personal development and for self-confidence. He can make anyone feel on top of the world with one of his great pep-talks. Edvard is a great friend, father, boss, and leader.

I am aware he is going to be sentenced soon, and I hope that his personality and who he really is, a hardworking - loving father and friend is taken into consideration. Thank you for your time.

Best,

Rita Hagopian

818-256-5453

Ex. 19

Letter of Arthur Ilangesyan

Arthur Ilangesyan
130 Aspen Oak Ln.
Glendale, California 91207

August 20, 2021

Re: Edvard Paronyan

Dear Hon. Wilson:

My name is Arthur Ilangesyan. I am a 45-year-old, married man with 2 teenage children and am a practice attorney with 18 years of experience. I have known Mr. Paronyan for almost 15 years (since the day he got married to my wife's cousin, Emily Paronyan). We have become so close together so quickly, that we call and treat each other like brothers. I am, especially as a traveler, so saddened and in such great misbelief that I am writing such a letter on his behalf. I truly am.

Mr. Paronyan does not belong in prison, believe it or not. I have talked to him on numerous occasions about the case, and cannot believe that he did not consult with me and get my advice (as he usually did for important things) before getting himself into such mess. I understand that pandemic had a toll on his business (which he had build into such a successful body shop). I also understand that some other financials were not going well. One thing I certainly do not understand, however, is that how the Edvard I know would get himself into something like that. Your Honor, he is NOT the type of a guy, and being a criminal is the very last thing that can go through anybody's mind knowing or meeting Edvard.

Mr. Paronyan is a perfect husband, ideal man, and the sweetest dad. I personally know his hard work for the sake of his family. The growth and ever-increasing happiness of his family due to his relentless efforts is right in front of my eyes. He would work long hours, and a lot of times he would forego fun times just to make sure he could provide the best for his family.

Honesty, hard work, pure soul, love, dedication and "coolness" is what sums up Edvard. The guy is always there for everybody and anybody that needs help. He does not hesitate to sacrifice his personal for the sake of making somebody he loves respects, or even just likes, happy. I love the guy so much that I cannot find the right enough words to describe him. I am not going to justify or excuse what he did or has been alleged to have done. He knows very well what I mean and the conversations I have had with him after the fact. If he goes to prison, his two beautiful kids will miss not only him, but his emotionally indispensable presence. His wife loves him in so out of control way that I cannot even imagine how she is going to handle his absence.

Hon. Wilson, as you know better than many of us, the goal of sentencing is to serve one or more of the following purposes: retribution, deterrence, incapacitation and rehabilitation. What really bothers me is that almost none of these apply to Edvard, especially the last three. Deter who? Edvard? It would be just absurd because he is not the type of person who gets involved in a

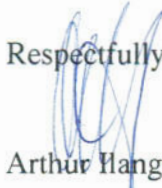
crime. Incapacitate? That just sounds offensively funny speaking of him. Rehabilitate? That would be very difficult concept to explain to anyone who knows Edvard. Retribution? Now maybe we can understand each other little bit. Yes, there is harm done to the society, and one needs to be punished. Please give him reasonably commensurate punishment that does not deprive him of his family and his healthy presence for the society. Instead of incarcerating him, give him the strictest punishment in freedom. As everybody around Edvard knows very well, he is already extremely remorsefully for what he did, and is willing to make up for it in any way short of losing his family for few years. Edvard being punished out of prison, not only will benefit his family and friends, but the society as a whole, as well. He was running a successful body shop with lots of employee and lots of taxes paid. Let him work so he can provide jobs for other families and pay taxes. That would also help him pay and satisfy whatever financial restitution Your Honor imposes on him to make the society whole. With Edvard serving a prison time is a lose lose situation for everybody involved.

I genuinely believe and can attest to the absolute fact that Edvard has learned his lesson. I have been in contact with him at least once or twice a week since after his arrest, and I know exactly what I am saying. So if there is any possibility, please leave him out of the "system" for the benefit of everybody. If not, I very respectfully beg (not ask) Your Honor to please be lenient with him at the sentencing so ALL of us do not lose a very respected and valuable member of a society for a good while. I personally, wholeheartedly vouch for Edvard – MY BROTHER.

Thank you very much in advance for consideration, Your Honor! God Bless You!

I can be reached any time of the day for questions regarding Edvard at (818) 395-7111.

Respectfully,


Arthur Hangesyan

Ex. 20

Letter of Eric Kang

Eric Kang

11280 La Maida St #203

North Hollywood, CA 91601

Dear Honorable Judge Wilson,

My name is Eric Kang. I have operated a business and worked in the travel industry for 25 years. I am currently looking for another business opportunity.

I first met Edvard (Ed) Paronyan approximately 5 years ago at a social gathering. We became friends soon after. Over these years, I have known him to be a generous, kindhearted and a loyal friend. To give some examples, he is the type of person that would be the first one to "grab" the dinner tab when out with friends. When he would ask how things were going on in my life, he would listen carefully to my responses and then offer a kind word or suggestion. In these conversations he would also share with me how much he cared for and loved his family. His family means the world to him. I found his approach to our conversations sincere and genuine; never embellished or exaggerated. Although I never found myself needing to ask him for a favor or assistance, I know he could be counted on if needed.

To say the least, I was taken aback when he told me about his legal situation. With great remorse in his voice, he explained to me what he did and what he was facing as possible punishment for his actions. Understanding what he was going through, it was difficult knowing there was little or nothing I could do other than being a source of moral support. When he finally asked if I could help by writing a letter on his behalf, I did not hesitate. I do so willingly because I know in my heart Ed is still a good man that is capable of learning from this experience and becoming even a better person because of it.

Thank you very much for this opportunity to share my thoughts.

Sincerely,

Eric Kang

Ex. 21

Letter of Anna Karabeyan

Dear Judge Wilson,

My name is Anna Karabeyan and I am a close family friend of Edvard Paronyan I have been an educator for over 20years working with underserved children in the Los Angeles Unified School District. I am writing this letter because I have come to know and respect Edvard for the kind person he is. I have witnessed Edvard show kindness to everyone from young children to the elderly. As an educator I tend to pay close attention to people's character traits and Edvard most definitely got my attention for the amazing person he is.

I have seen him be a selfless father putting his children's needs ahead of everyone else. As an educator I know how important it is for a child to have their parent's presence and how devastating it could be on a child's mental and emotional state not to have their parent around. I hope and pray there is a way Edvard's children never feel the absence of their father. He is a great friend who goes above and beyond for everyone in his life. I have witnessed on many occasions Edvard offering his help when someone was in dire need. It is simple acts of kindness that we tend not to forget. I will never forget how good he has been towards my family. Any time my husband and I go out of town Edward is the first one to check on my children. Although my kids have always been taken care of, he still checks in to see how he could be of service. Those things are so important, it gives a person a sense of community. Edvard is the person you want as a friend. He will always be there and help in any way, as long as he thinks you're in need of help. I have known many people professionally and personally and can wholeheartedly say Edvard is one of the best people I know. He is a good father, husband, friend, and overall person.

Thank you for your time.

Yours Truly,

Anna Karabeyan

Ex. 22

Letter of Ashot Keshishyan

Dear Judge Wilson,

My name is Ashot Benjaminovich Keshishyan, and I am writing to you today regarding my dearest friend and companion, Edvard Paronian. I have spoken with Edvard about his case and Edvard explained what he has done and that he will be sentenced in the near future.

In order to provide some background, I would like to introduce myself. I am a 36 year old father of three, my children are 5, 4 and 6 months. My oldest child, Natalie, is the same age as I was when I first immigrated to the United States with my parents and younger brother. Similar to numerous immigrant families, upon arriving to the states my family and I started our uphill journey assimilating to the American culture. As the eldest child, I had to grow up fast and look over my little brother, and soon to be born baby sister. When I was about 18 years old my father took me to work with him at an auto body shop in the San Fernando Valley. Little did I know that this new job was going to lead to a life-long friendship with Edvard Paronian.

Edvard and I started off as co-workers and our friendship progressed so rapidly that I find it extremely difficult to remember a time where we weren't best friends. Growing up as the oldest child always had its shortcomings. Having a sister 10 years younger than me, and a father who was working over 10 hours a day, 7 days a week, I found myself taking on both the role of a father to my little sister and an older brother to my younger brother. It wasn't until I met Edvard that I learned what it's like to have an older brother. For the first time in a long time, I was able to feel what it was like to have someone watch out for me, to care for me, and to help me with whatever issue came my way. Though we are not blood related, Edvard and I have always been and always will be brothers.

Edvard and I quickly grew up together. Before I knew it Edvard was the first one amongst our friends to marry and have a child. Seeing Edvard as a husband and father was inspirational, and that's not a compliment I take lightly (as my own father set a really high standard). Edvard is not only an amazing husband, but he is an exceptional father, always making time for his children and putting their needs first. Edvard is also a loving uncle to his brother's child and to my three children. When my kids see Edvard walking up my driveway, they run into his arms yelling "uncle Ed." When it comes down to it, I know that Edvard will walk to the ends of the earth to help his family, his friends, or anyone who he sees in need. Edvard is a loyal friend, a devoted father and a loving husband. After spending almost 20 years together, I can wholeheartedly say that Edvard is a very special human being. Though his exterior may be misleading, internally he is the kindest most gentle human I have ever met.

Though it is with great sadness that I must part ways with my best friend Ed, I plead with you Judge Wilson to take the aforementioned into consideration during sentencing. Thank you for taking the time to read my letter and to hear what I have to say about my dearest friend Edvard.

Best Regards,
Ashot B. Keshishyan

Ex. 23

Letter of Linda Khachatryan

Linda Khachatryan

818.442.8277

LKhachatryan@me.com

RE: Edvard Paronyan

To Whom It May Concern:

My name is Linda Khachatryan, I am a Leasing Manager for Unibail Rodamco Westfield. I am writing to you on behalf of Edvard Paronyan's character and what he means to me. Firstly, I am related to Edvard Paronyan by way of marriage, his wife Emilia is my cousin. I have known Eddy for as long as he has been in my cousin's life. When I first heard about this case, I was shocked and heartbroken. Please know, I was never asked to write this letter, however I felt an internal obligation to do so based on knowing Eddy, his heart, and who he is at his core, at his purest and most vulnerable. It is easy to read information about someone on paper and keep it very black and white. However, to know Eddy it's hard to imagine life, even momentarily, without him by our side – and that's where our world turns to gray.

I grew up being the oldest of 3 girls, with a very relaxed man for a Father. He was an amazing dad, worked extremely hard from the moment he stepped foot in the United States to provide for us - but all he knew was work, dinner, and sleep. Rarely do I remember sitting down for conversations with him, getting direction or feedback, much less vacations or time spent hanging out and this is the case to this day. Meeting Eddy, I was 13 or 14 and I remember from the very first interaction how kind, sweet, and warm hearted he was, and how comfortable he made me feel. He took time to get to know me. As his life progressed with my cousin, he made sure to include me in everything, and I felt welcomed. Emilia is my family, but Eddy is the reason we became so close. I have male cousins, but for the first time in my life I felt like I had a brother, someone I can depend on and count on to help me, give me advice, and no matter what time he was always a phone call away. No matter how small, big, or embarrassing my issues may be I have never felt anything but love and genuine care in his feedback. I am now 30 years old, and to this day he is the one person I know I can count on always to support me. He was the first person to find out about my boyfriend, and he gave me honest advice about how to move forward and how to introduce him to everyone else. He is the person I go to when I'm having a bad day and need honest feedback, he's the first person I think of sharing news with when I have something great happen in my life. My boyfriend has two older brothers, but when he needs an honest opinion or a friend to talk to, Eddy is the first person he thinks of. When we talk about marriage Eddy is the only person we think of to be the best man, when we talk about having our own children and who we would want to be there for them Eddy is the only person we think of as a Godfather. When we talk about the future and buying a home, we always talk about how amazing it would be to be neighbors, because living 15 minutes away is too far. In every conversation we have about our lives and the future, the 2nd or 3rd sentence always has to do with how we can include Eddy in it. Edvard has a remarkable way of touching lives and leaving a warm imprint on everyone who meets him, you immediately build a bond. I love his son and daughter

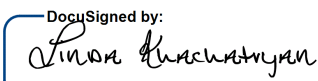
and so much of that loves for them comes from the love I have seen from Eddy. Every good moment in my life goes back to Eddy, every happy memory has him in it, and so much of who I am as a person today has to do with his guidance and support. When I was changing careers and getting into leasing, I was scared out of my mind and Eddy sat down with me and talked to me about my concerns and fears, he makes me feel like I can never fail if I just try and believe in myself. Stepping into every promotion and every step up professionally and personally has been with his hand on my back. As an aunt to his children, I can only hope to someday be as important and impactful to them, as Eddy has been to me. I hope to show them the love and support their father has shown me and continues to show me through my most crucial years and most important decisions. And some day as a mother, I hope to give my children the love, support, and courage to go after every dream they have the way he has done with me.

I see his support of my cousin and their children. No matter how bad his day has been he never allows those around him to feel it. My aunt has cancer and last March her colon exploded, Emily was stuck in the hospital for days at a time and Eddy was there to be her strength mentally and emotionally and was there to make sure his kids never missed a beat with meals, school, homework, or life. When she was released from the hospital the world went into lockdown, and Eddy had my aunt and her husband stay with them, so they were taken care of and did not have to leave the house for anything. This may seem like a small thing to do, except he didn't have to give up his home, comfort, and freedom within his own 4 walls to have his in-laws move in. In his hardest of times, he has put himself aside to ensure my cousin feels supported – the strength he has given her to fight through for her mom when most men would not be capable of seeing outside themselves makes me love him so much more each and every day. My niece has an incredible bond with her mom, but the world is set aside when Eddy is around, she would much rather be at home watching movies with him than be anywhere else in the world with anyone else. When my nephew speaks about Eddy, his eyes light up like he's talking about his favorite superhero from a movie – there is so much pride in every word he speaks of his dad. My heart aches imagining a day where my nephew won't have that pride when he speaks of him, or a day when my niece won't have her "daddio" to snuggle up to on the couch to watch another movie or learn more about football, soccer, and basketball.

When the time comes, I ask the courts to please consider not just Edvard in his sentencing, but his family. To think of his 6-year-old daughter who would rather be home next to her dad than anywhere, and his 11-year-old son whose hero he is and not allow that to fade into "was". To consider his wife who looks for his support and strength each and every day. To not take away our foundation. He truly is an exceptional human being and outstanding member of society.

To know Edvard is genuinely is my honor, to know Edvard is to love him.

Thank you,

DocuSigned by:

7A88DE14EC764C0
Linda Khachatryan

Ex. 24

Letter of Hana Kim

August 10, 2021

Hana Kim
1845 North Pepper St.
Burbank, CA 91505

Dear Judge Wilson,

My name is Hana Kim. I am a business owner, father of two and husband. I am writing this letter on behalf of Edvard Paronyan.

I met Edvard by chance in 2016. I was driving on Magnolia Blvd during midday traffic. My car broke down in the middle of the street. I was alone and trying to push my car to safety on the side of the road. As one can imagine, this was difficult and progress was slow. While other cars were honking for me to move faster, I saw a car pull over nearby. The driver came out and walked my way. Surrounded by a cacophony of honking horns and shouts from other drivers, Edvard helped me push my car to a safe area on the road. He was a complete stranger, on his way to his own destination. He helped me, no questions asked. I was impressed by and thankful for his kindness.

We kept in touch throughout the years. I know him to be good hearted, responsible and someone I can count on. When he told me about his situation and asked for this letter, I agreed immediately. I believe that he is remorseful for his actions and will learn from this experience.

Sincerely,



Hana Kim

Ex. 25

Letter of Vram Manukyan

Dear Judge Wilson,

My name is Vram Manukyan. I am a U.S. citizen, the United States has been my home for almost 28 years. Edward Paronyan has been my best friend since 1994. Our friendship began at Joseph LeConte Middle School. After graduating middle school I transferred to Hollywood High School. After attending a year of high school, Edward graduated middle school and joined me in Hollywood High School.

During our teenage years we spent most of our time together. He was always very respectful towards everybody, he was helpful, and always made sure everyone around him was happy. I have never seen or heard anything bad about him.

After many years, we both got married and grew our friendship even tighter because our families are close to each other as well. Then we both had our own kids. They became really close like brothers and sisters. Till this day they have the same bond.

In 2021, I decided to Christian my kids. There was no better candidate to be the godfather than Edward Paronyan because my kids love him very much. He is kind hearted, caring, and the funnest person to be around. He became the godfather of my kids in Saint Peter Armenian Apostolic Church.

Dear Judge Wilson, I hope you will find forgiveness in your heart and give a second chance to our caring friend, father, and godfather. Thank you for taking the time to read this letter and getting to know Edward better.

Thank you,
Vram Manukyan

Ex. 26

Letter of Amit James Nath

Amit James Nath

17048 Itasca St.

Northridge CA 91325

August 19, 2021

RE: Edvard Paronyan

To The Honorable Judge Wilson

I would like to introduce myself as Amit James Nath, working in the position of an executive for Bank Leumi USA. I am writing this letter to you to provide a character reference about Mr. Edvard Poronyan. Ed and I have been close friends for over 7 years. In this time, he has proven to be a fine and responsible character. In general, Mr. Paronyan a business owner is known for being a dedicated husband and father. As a reliable member of the community, Mr. Paronyan's charges were quite unexpected, and I'm provide this reference in full knowledge of them.

Mr Paronyan confessed to me the serious lack of judgement he exhibited and expressed remorse. I believe Ed has every intention of improving since, since he has already started volunteering at various organizations. Ed and I became friend through little league for our kids. I can confirm that in all the time I have know him, Edvard Paronyan has been a reliable, trustworthy, and decent person.

Ed has thus far shown a steadfast and resolute demeanor in moving past this mistake in a constructive and successful manner. It is my hope that this letter regarding Mr. Paronyan and his case will act as a positive and contributing factor when the court decides this matter.

Sincerely,

Amit James Nath

Ex. 27

Letter of Suzanna Pembedijan

Suzanna Pembedjian

Spembedjian@gmail.com

08/20/2021

Dear Judge Wilson,

I would like to begin my introducing myself, my name is Suzanna Pembedjian I am 35 years old and immigrated to the United States with my family at the age of 4. My parents sacrificed the love of living in their homeland to give my siblings and I a better future. I am currently working as a Licensed Register Nurse and continuing my education as a family Nurse Practitioner. Edvard Paronyan and I are second cousins, his father and my mother are siblings, Edvard has been a part of my life for as long as I remember myself. I have always looked up to him as a bother to me, he has been a close friend and confidant since childhood. Edvard was instrumental in my early development, he has become a role model and guide to me due to his unexpendable values of dependability, compassion, and respect.

Edvard has, over the years, showed compassion and kindness to his family and the larger society. When we were children my mom would take us over to my uncle's house weekly, every Sunday. Edvard, was deeply involved in charity work organized by religious organizations at his church directly next to their Hollywood Apartment. This is one of the earliest memories I share with Edvard, he has always been very athletic and he would use that energy to assist the church organize basketball and football games for all the children in the community. Every Sunday he would take me over to the church with him, and I would watch him help so many kids in the community find a sense of belonging. He has never lost touch of these characteristic as he has aged throughout the years, he has carried with him the idea of bringing people together and always positively influencing our lives. He will never hesitate to gather our family and extended family together in one place so we can always stay close and

our children can have the opportunity to grow up together, as we have. He values family, togetherness, and always has a lot of love to share.

He is a very compassionate person. His compassion is also demonstrated by his regular calls to me and checking in on me but most of all to his parents and their well-being. Edvard also regularly takes responsibility for his aging parents without necessarily being obliged to, demonstrating his deep concern and care. My uncle, Edvard's father, lives alone and has many health problems, Edvard one of the most caring and dependable sons I have the pleasure of knowing. My uncle always makes sure to thank Edvard for being his lifeline. Always making sure he has food to eat for the week, has a ride to his doctor's appointments. Edvard has showed to be a critical part of his father's life and is ready to lend a hand anytime he is needed. I know that this day in age, time is very precious and when you have someone always ready to be there for you and give you their time, for me, it has been irreplaceable.

Furthermore, I know Edvard Paronyan to be a dependable father, son, friend, and sibling. Edvard cares deeply about his young family, to whom he tirelessly works to provide a comfortable and meaningful life. He is respectful to people regardless of their age, relations, race, or socioeconomic status. His compassion and selflessness has led him to be loved by everyone who is surrounded by him.

Sincerely,

Suzanna Pembedjian

Ex. 28

Letter of Anait Ana Poladyan

Anait Poladyan
650 E. Palm Ave. # 102
Burbank, CA 91501

August 18, 2021

RE: Mr. Edvard Paronyan

To The Honorable Judge Wilson,

My name is Anait Ana Poladyan. I am the managing attorney and founder of Poladyan Law Firm, APC located at 1525 W. Magnolia Blvd Burbank, CA 91506. I have known Edvard my entire life (31 years) and have always viewed him as an older brother. Edvard has been in my family since before I was born, as he is the nephew of my uncle's wife. However, Edvard isn't only family. He has been there for my family as a brother, a loyal friend, a motivator, and a helping hand.

I am aware of Edvard's current involvement with the case for which I am composing this letter. Edvard and I have spoken about his connection with the case, and he has explained the charges brought forth against him. I am aware that he will be sentenced soon. Thus, if I can be of any assistance and do so much as shine some light on the character of Edvard, I find that it is not only my duty, but my desire to do so. It really takes a circumstance as the one brought upon us now to make one really think about what effect someone has had on their life and what qualities he portrays.

Rather than talk about general characteristics of Edvard, I prefer to discuss specific qualities that I have personally noticed in Edvard throughout my life.

Seventeen years ago, when I was fourteen years old and living in Glendale, CA, I was accepted to Providence High School in Burbank. My father was working early mornings, and my mother was caring for my two young sisters, a four-year-old and a newborn. I recall being let down because my parents decided that the school wasn't going to work for us as it was a private school with no transportation, and my parents were unable to make the commute. As I reluctantly made arrangements to go to a local high school, my father let me know that Edvard had offered to go out of his way and take me to my desired school every weekday before heading in the opposite direction for his work. For the next four years, every morning, Edvard was waiting for me outside of the vehicle at 7:30 AM. It was because of him that I was able to go to the school I wanted. He was my hero. I speak about this because it only shows how selfless, giving, and trustworthy Edvard is. Not only did he lend a helping hand when he had no obligation to do so, but he had my parents' full trust in transporting their young daughter to school daily. Our commutes were always filled with interesting conversations, and Edvard always inspiring me to achieve greatness.

Several years later, Edvard found the love of his life and was soon married, creating a family of his own. I saw him as a newlywed, adapting to being the sole provider of the house and working tirelessly every day and every night to provide a life for his new family. I spent a great deal of time with Edvard's wife during the first couple of years of marriage, and always recognized Edvard's ability to simultaneously give equal care and attention to his wife and his work. The

little free time he had was spent with his wife, and shortly after, his son. I was there when his family went through tough times. However, it was the way Edvard carried himself during those times that stood out to me, always with a smile on his face. He remained diligent and easy to talk to, spreading positivity wherever he went.

As I became an adult, and the age gap between Edvard became less apparent, Edvard was no longer my big brother but my friend. When I had my own personal issues between my father and current husband, it was Edvard who took on the role of mediator. He sat for hours to listen, to provide advice, and to assist me with whatever issues were going on in my life. His time, effort, and patience gave me the confidence and assurance that I never knew I was lacking. He truly has a heart of gold.

Today, Edvard and I are both married with children, and our kids call each other cousins. Edvard is an amazing father and role model to his children. Whether it is playing football with his son or barbies with his daughter, his children have become his main priority. It is Edvard who is constantly trying to gather us all together, so the children can get to see one another and build bonds. Our large family is persistent to plan day trips, weekend trips, and even simple get togethers to spend time with one another. Edvard is always the easy going, cheerful one that can lighten up anyone's mood. Regardless of what he is going through, he is smiling, grateful, and positive.

It is my sincere hope that the court takes this letter into consideration at the time of sentencing.

Despite the mistakes Edvard has made, he is still the same loyal and selfless friend and hard-working and loving father and husband.

Respectfully,

A handwritten signature in black ink, appearing to be 'Anait', with a large loop at the start and a long, sweeping tail.

Anait Ana Poladyan

Ex. 29

Letter of Mariana Tsotsikyan

Dear Judge Wilson,

My name is Mariana Tsotsikyan. I am forty-one years old and an United States citizen. I am the CEO of Security Specialists. Edvard Paronyan is a good friend of mine over a decade. Since 2005, all I have seen from Edvard is the active conscious concern he has for others. I have seen him serve his community, friends and family with the best of his abilities.

I am a widow since 2018, since my husband suddenly passed, leaving our two children, Nicole and Chris, for me to take the role as a mother and a father. Edvard spent everyday being there for my children as an uncle to make sure they grieve and have a male figure in their lives. He helped me grieve by being my by side everyday and making sure I am able to hope again. He continues to be the supportive friend as I continue to heal.

Edvard Paronyan is an amazing father. One who has looked to righteous morals to discipline his children. As a husband, he has and is always respectful and loving to his wife. Edvard makes sure his family's joy is his joy. Edvard is a good friend to everyone. His heart aches to see someone else upset or in pain. He is the funniest person I have ever met. He will make the saddest moment into the most joyful memory to never be forgotten. Edvard is a good citizen of his home, neighborhood and city. He is the one to lend a hand when the neighbor needs moving, or the church down the street needs donations. As years passed I have witnessed the maturity, wisdom and strength he has gained. I understand Edvard Paronyan will soon be sentenced and I hope you take the consideration of his true character.

Thank you for your time and God bless you.

Sincerely,

Mariana Tsotsikyan
(818)378-4882
Mzbrunette1@yahoo.com

Ex. 30

Letter of Armen Yakhszyan

08/12/2021

Armen Yakhszyan

714 East orange Grove Ave, unit b

Burbank, CA 91501

Dear Judge Wilson.

I've known Edvard Paronyan for a long time; he is one of my best friends for almost about 18 years. Additionally, I started working for him for 4 years at Red Line Auto Collision.

All I can say about Edvard is that he is a great man with a very kind heart. He's is very hard working family oriented, honest and polite. He is a very good friend and always offers a helping hand to someone in need. His love to his family and friends is unconditional. He is an intelligent human being of good character.

He is a great boss. He cares about his employees and treats them as we are a family. During the difficult times, when pandemic started, the business was very slow, we were hearing businesses closing left and right, but Edvard was doing his best to pay his employees on time and making sure were all doing well.

Despite the current case, I still believe Edvard Paronyan to be an honorable individual, a good human being and a valuable member of our community

Sincerely

Armen Yakhszyan

Ex. 31

Letter of Sung Yi

Dear Judge Wilson,

My name is Sung Yi. I'm one of Ed's many friends who feel great sorrow for the circumstances of writing this letter. I'm a father of 3 and like Ed, I'm an immigrant to the USA. I was born in Korea, raised in Hawaii and eventually moved to Los Angeles after high school to attend school at Cal State University, Northridge. I'm currently a business owner in the textile industry and have been so for the past 19 years. I've known Ed for the past 6 years after being introduced to him through a mutual friend.

Until recently, Ed has always been a happy go lucky person and an extremely loyal and dependable friend. He's the type of friend that is upbeat, has positive energy and one that raises the energy and mood in every situation. A person that will always help a friend or stranger in need. In fact that is how I have come to know Ed. A mutual friend shared his story of how Ed helped him when his car had stalled on the street and Ed was there to help him push his car out of traffic. He has shared the details of his case and clearly feels the shame and pain of this mistake that has put him and his family in the current situation. Being a parent, one of the greatest fears is to not be able to be there for your kids. Whether it's simply being there to pick them up from school, reading a bed time story or giving them a warm hug when you come home from work. These are some of the things that he will miss the most. There is no doubt he has made the biggest mistake of his entire life and his entire family will be sharing in the punishment with his absence. Everyone that knows Ed will be missing a bright positive energy while he is gone. Yes, he has made a mistake and will have to accept the punishment given to him but Ed is truly a good soul and deserves to be seen for all the good he has done and will continue to do for his family and friends and for his community.

Judge Wilson, I hope you will judge Ed not only by the one big mistake he has made but all the positive things he has done with his life as well. The positive impact that he has on others who in turn will pass on the positive energy into the world. A butterfly effect of amazing energy. He is one of the good ones that truly contributes to society and I pray you can and will see that from the letters written by his friends and family.

Sincerely,

Sung Yi