DECLARATION OF TIMOTHY MASSINO

I, Timothy Massino, hereby declare and state as follows:

I am a special agent with the Small Business Administration, Office of Inspector General ("SBA-OIG"). The SBA-OIG is one of the federal agencies charged with investigating fraud related to the Paycheck Protection Program ("PPP") and the Economic Injury Disaster Loan ("EIDL") program. I am one of the agents assigned to the investigation that resulted in the indictment and first superseding indictment in United States v. Richard Ayvazyan, 20-579(A). I am basing this declaration on my personal observations and information obtained from various law enforcement personnel and witnesses during the course of this investigation. As a result of my involvement in this investigation, I know the following and could and would testify to those facts fully and truthfully if called and sworn as a witness:

1. In June 2020, the government opened an investigation into a Los Angeles-based ring that was using stolen, fake, and synthetic identities to fraudulently apply for benefits under the PPP and EIDL programs, two relief programs which were enacted as part of the Coronavirus Aid, Relief, and Economic Security Act (the "CARES Act") to assist businesses that had been impacted by the COVID-19 pandemic.

2. Over the next four months, the government served over 200 subpoenas, obtaining information from federal and state agencies, lenders, retail banks, and escrow companies, among others.

3. Based on my training and experience, when planning to execute a premises search warrant, federal law enforcement considers the steps necessary to protect the safety of the agents who will conduct the search.

4. In determining what was necessary to protect officer safety when conducting the search of SUBJECT PREMISES-4, relevant considerations included concerns about defendants' potential possession of firearms and links to the "Armenian Power" gang.

5. When executing the search warrant for SUBJECT PREMISES-4, an FBI SWAT team made the initial entrance in order to secure the property and ensure the safety of the searching agents. To protect officer safety, the SWAT team disabled security cameras.

6. The presence of a tactical unit such as the FBI SWAT Team and disabling of security cameras are commonly used methods to protect law enforcement agents when executing warrants.

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

TIMOTHY MASSINO