

Exhibit 1

Declaration of Sara Vargas

1 *The defendant and government are engaged in plea discussions. It is essential*
2 *to the integrity of the trial process that the existence of those discussions not be*
3 *publicly disclosed. We cannot share the detail of those discussions with you in*
4 *a message but are available to meet in person when you're back in the country.*

5 g. Mr. Esco emailed me on May 15, 2024 to ask, “[sic] Has you and the defense
6 [sic] reach a deal yet?”

7 h. On May 17, 2024, a Victim Witness Coordinator responded to Mr. Esco and
8 wrote, “A plea agreement has not been reached. They would like to get your views on a possible
9 plea agreement. Please feel free to send your thoughts to me. I will send them to the AUSAs.”

10 i. On May 17, 2024, Mr. Esco responded, “To be honest, I would rather
11 continue with a trial to get the maximum time he deserves. This person deserves to be locked up
12 15+ years. I want to know the details the [sic] prosecutors are discussing with the defense team in a
13 terms of deal. Also, something is not clear is who initiated this plea discussion, the defense or the
14 prosecutor? I don't understand why I have to travel all that way to Vegas to get an answer that can
15 be simply written on a secured email. I am willing to sign a confidentiality agreement to protect at
16 the integrity of the court.”

17 j. On May 20, 2024, a Victim Witness Coordinator responded to Mr. Esco,
18 “Thank you for your response. The AUSAs will take your views into account in any plea
19 discussions.” Mr. Esco then made one or more telephone calls to the Victim Witness
20 Coordinator, who responded by email to request that Mr. Esco contact her by email instead. In
21 his subsequent e-mail, Mr. Esco asked, “Who initiated the deal negotiations?” The Victim
22 Witness Coordinator repeated, “We cannot share the detail of those negotiations with you in a
23 message but are available to meet in person. Thanks.” Mr. Esco responded, “I didn't ask for
24 details of the negotiations, I just ask which party initiated the discussions. Its perfectly legal.”

25 k. According to the Victim Witness Coordinator, Mr. Esco made numerous
26 telephone calls per day to the Victim Witness office. For example, on or about May 24, 2024, Mr.
27 Esco apparently called the Victim Witness Coordinator approximately ten times, sent an email
28 calling the Victim Witness Coordinator “unprofessional,” among other things, called the reception

1 desk at the United States Attorney's Office, and left a voice memorandum by text to the Victim
2 Witness Coordinator saying, in part, "I don't want any emails. Please give me a call back."

3 1. During this period, Mr. Esco sent text messages to my work cell phone. I
4 responded that I was unable to communicate with him without an agent present, and that future
5 communications would need to go through a Victim Witness Coordinator.

6 m. On May 20, 2024, Mr. Esco called me to request an in-person meeting in Los
7 Angeles, rather than in Las Vegas. I offered to meet with Mr. Esco on one of several dates. He
8 elected to meet on July 10, 2024.

9 n. The Victim Witness Coordinator informed Mr. Esco that a plea agreement
10 had been reached, and that a change of plea hearing would take place on June 7, 2024.

11 o. On June 6, 2024, Mr. Esco informed a Victim Witness Coordinator that he
12 would be in Las Vegas the next day and wished to speak with someone from the United States
13 Attorney's Office the following day. On June 7, 2024, Assistant United States Attorney Dan
14 Cowhig, accompanied by two FBI special agents, met with Mr. Esco. During those meetings,
15 AUSA Cowhig described the plea agreement to Mr. Esco and provided some information about
16 why the government believed it was an appropriate outcome. Mr. Esco responded by expressing
17 dissatisfaction and asked questions about how the plea negotiations arose. AUSA Cowhig
18 responded to some of these questions and further advised Mr. Esco about his allocution rights.
19 Prior to the meeting, Mr. Esco was repeatedly admonished that he was not allowed to record
20 proceedings or meetings.

21 p. Subsequent to Mr. Esco's meetings with AUSA Cowhig, Mr. Esco sent me
22 an email containing what Mr. Esco described as "direct quotes from Mr. Cowhig from our
23 conversation on June 7, 2024." The email contained what seem to be quotations, potentially from
24 a recording that Mr. Esco made.

25 q. On July 10, 2024, Special Agent Ramel Moore and I met with Mr. Esco at
26 Mr. Esco's request. The meeting lasted for about one hour and took place at the FBI's office in
27 Westwood, California. During the meeting, I advised Mr. Esco of the nature of the government's
28 revised plea offer to defendant Khalilian. Mr. Esco responded, in substance and in part, by

1 indicating his disagreement with the nature of the potential plea offer and that he remained
2 concerned for his safety. He was dissatisfied with my unwillingness to provide him with details
3 about how the plea negotiations and offer arose. He asked for the names of my supervisors, and I
4 provided that information.

5 r. On numerous occasions during the prosecution and in the aftermath of this
6 case, Mr. Esco noted that he was producing a documentary about his experiences. Mr. Esco
7 indicated that the documentary would include information about Mr. Khalilian as well as Mr.
8 Esco's perceptions about the United States Attorney's Office.

9 I declare under penalty of perjury under the laws of the United States of America that the
10 foregoing is true and correct and that this declaration is executed at Los Angeles, California, on
11 May 28, 2025.

12 *//s// Sara Vargas*

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SARA VARGAS