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6 Attorneys for Plaintiff  
7 United States of America

8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 TROY STRATOS,  
15 Defendant.

CASE NO. 2:11-CR-00537 TLN

DECLARATION OF SGT. DENNIS PRIZMICH  
RE: SENTENCING OF DEFENDANT TROY  
STRATOS

17 I, Dennis Prizmich, hereby declare as follows:

18 1. I am deputy with the Sacramento County Sheriff's Office with the rank of Sergeant. I am  
19 currently assigned to the Sacramento County Jail, and my responsibilities include monitoring inmates at  
20 the Jail, including those held in federal custody. I have personal knowledge as to the following facts or  
21 if not, the information below is stated on my information and belief.

22 2. I am familiar with defendant Troy Stratos, who has been housed at Sacramento County  
23 Jail since approximately December 2012. I have also had the opportunity to review the Jail's records,  
24 including incident reports, with respect to Mr. Stratos.

25 3. During his detention at the Sacramento County Jail, Mr. Stratos been moved  
26 approximately 32 times, which in my experience is an incredibly high number of relocations. The vast  
27 majority of those moves have been done to ensure Mr. Stratos's safety and/or to avoid violence or  
28 disturbances by other inmates, and have often been done at the request of Mr. Stratos after he has

1 reported threats from other inmates. Based on my discussions with Mr. Stratos and/or other inmates, or  
2 on information I obtained from other deputies at the jail and in incident reports, the reason for the threats  
3 to Mr. Stratos is that other inmates have accused Mr. Stratos of scamming them out of credits at the  
4 commissary or refusing to pay gambling debts that Mr. Stratos has incurred.

5 4. I am aware that Mr. Stratos has attempted to contact former inmates after their release  
6 and has requested them to undertake various activities on his behalf, including trying to locate experts  
7 on bitcoin.

8 5. I am aware that Mr. Stratos has promised inmates to help establish and manage various  
9 careers after their release, including careers in male modeling or in the entertainment industry. He has  
10 attempted to train or give instructions in custody to inmates on how to walk like a model.

11 6. I attended the hearing on June 23, 2016 on the United States's motion to preclude Mr.  
12 Stratos from contacting potential witnesses based on the allegation that attorney Ellen Dove allowed Mr.  
13 Stratos to use the speakerphone feature on her cellphone to contact witnesses without being recorded  
14 and monitored by the Jail's telephone system. The Jail's policies prohibit attorneys from using their  
15 cellphones when meeting with inmates. I have questioned Ms. Dove about this, and she acknowledged  
16 she had her cellphone in the attorney-inmate meeting room when meeting with Mr. Stratos. Ms. Dove  
17 has not admitted to me that she permitted Mr. Stratos to use her cellphone despite what I understand to  
18 be contradictory evidence submitted to the Court by the United States.

19 7. To date, Mr. Stratos has met with Ms. Dove approximately 400 times since January 2015.  
20 On average, she has met Mr. Stratos twice per week for approximately one hour each meeting.  
21 Sometimes she has met with Mr. Stratos multiple times the same day. This does not include meetings  
22 by Ms. Dove's associate attorney with Mr. Stratos. In my training and experience, this is an  
23 extraordinary number of attorney visits.

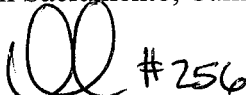
24 8. I am not aware of any pending litigation in which Ms. Dove represents Mr. Stratos. On a  
25 recorded telephone call by Mr. Stratos in the Jail to a relative in June 2015, Mr. Stratos stated that Ms.  
26 Dove did not represent Mr. Stratos as a lawyer but was just a friend, and that Mr. Stratos had no  
27 intention of suing the Jail and was not aware of any efforts by Ms. Dove to file a lawsuit on his behalf  
28 against the Jail. To date, no lawsuit has been filed by Ms. Dove and I am not aware of any pending

1 litigation involving Mr. Stratos for which Ms. Dove is an attorney of record.

2 9. Ms. Dove has placed approximately \$5,600 on Mr. Stratos's commissary books. I am not  
3 aware of instances where attorneys have placed such large amounts of money on their client's books.

4 10. In July 2016, Ms. Dove was prohibited from using the pass-through privileges due to  
5 violation of the Jail's regulations with respect to bring to Mr. Stratos or receiving from him non-legal  
6 mail. Prior to her prohibition, Ms. Dove routinely brought to or received from Mr. Stratos documents.  
7 Further, in June 2016, I and other deputies had occasion to search Mr. Stratos after he visited with Ms.  
8 Dove. In a folder purported to be marked legal mail, we found documents relating to a \$32,000,000 real  
9 estate transaction. One of the documents in connection with this multi-million-dollar potential sale was  
10 marked "Ellen Dove Project." Other documents in the folder related to efforts to register 20 or 30  
11 domain names and other business ideas apparently by Mr. Stratos. Additionally, since January 2015,  
12 when Mr. Stratos began visiting with Ms. Dove, Mr. Stratos has not sent or received any mail. Prior to  
13 this occurrence, he had sent or received at least a half-dozen items. Based on these facts and my training  
14 and experience, I believe that Mr. Stratos is using Ms. Dove's status as an attorney to pass non-legal  
15 mail and communications in violation of the Jail's policies.

16  
17 I declare under the penalty of perjury under the laws of the United States that the foregoing is  
18 true and accurate. Executed on Nov 28, 2016 in Sacramento, California.

19  #256  
20 \_\_\_\_\_  
21 SGT. DENNIS PRIZMICH  
22 Deputy, Sacramento County Sherriff' Office  
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