

Charles C. Morgan (pro hac vice)
ccmlegalfirm@yahoo.com
CHARLES C. MORGAN LEGAL PRACTICE, LLC
4151 Pelicans Nest Drive
Bonita Springs, FL 34134
Tel. 609-636-0544

Attorney for Defendant
ROWLAND MARCUS ANDRADE

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

SAN FRANCISCO DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

NAC FOUNDATION, LLC, et al.,

Defendants.

Case No. 3:20-cv-04188-RS

**ATTACHMENT-A OF DEFENDANT
ROWLAND MARCUS ANDRADE'S
NOTICE OF MOTION
AND MOTION FOR
DISQUALIFICATION OF THE
HONORABLE RICHARD SEEBORG
PURSUANT TO 28 U.S.C. §§ 144 AND
455 AND CIVIL LOCAL RULE 3-14;
MEMORANDUM OF POINTS AND
AUTHORITIES**

Exhibit A

1 MICHAEL J. SHEPARD (SBN 91281)

mshepard@kslaw.com

2 **KING & SPALDING LLP**

50 California Street, Suite 3300

3 San Francisco, California 94111

4 Telephone: +1 415 318 1221

5 KERRIE C. DENT (admitted *pro hac vice*)

kdent@kslaw.com

6 **KING & SPALDING LLP**

1700 Pennsylvania Avenue, NW, Suite 900

7 Washington, DC 20006-4707

8 Telephone: +1 202 626 2394

9 CINDY A. DIAMOND (SBN 124995)

cindy@cadiamond.com

10 **ATTORNEY AT LAW**

58 West Portal Ave #350

11 San Francisco, CA 94127

12 Telephone: +1 408 981 6307

13 Attorneys for Defendant

14 ROWLAND MARCUS ANDRADE

15
16 **UNITED STATES DISTRICT COURT**

17 **NORTHERN DISTRICT OF CALIFORNIA**

18 **SAN FRANCISCO DIVISION**

19 UNITED STATES OF AMERICA,

20 Plaintiff,

21 v.

22 ROWLAND MARCUS ANDRADE,

23 Defendant.

Case No. 3:2-cr-00249-RS

**DECLARATION OF KERRIE C. DENT
IN SUPPORT OF DEFENDANT MARCUS
ANDRADE'S CORRECTED SECTION
FOUR CIPA SUBMISSION**

Judge: Hon. Richard Seeborg, Chief Judge

Kerrie C. Dent, counsel for Defendant Marcus Andrade, states as follows:

1. I am one of the lawyers representing Defendant Marcus Andrade in the above-captioned matter. I have personal knowledge of the discovery disputes and related correspondence between the government and defense counsel and, if called as a witness in this matter, could competently testify to the matters stated in this Declaration.

2. I handle most of the discovery communications and filings for Mr. Andrade's case. Throughout the discovery process, Judge Beeler repeatedly has ruled that requested discovery was required by Rule 16 (and potentially *Brady* and *Giglio*) and ordered the government to make productions. *See, e.g.*, Order dated April 7, 2023, Dkt #165 (ordering production of all 5 categories of materials identified as priority items from November 28, 2022 motion to compel); Order dated March 17, 2024, Dkt. # 292 (ordering production of 10 of the 11 categories of materials requested from January 25, 2024 motion to compel); Order dated July 13, 2023, Dkt. #198 (ordering the government to produce the Jack Abramoff's phone); Order dated May 10, 2024 Dkt. #309 (ordering the government to provide Mr. Andrade access to his Trezor wallets).

3. The government just produced the phone and iPad of Alexander Levin, one of Abramoff's partners in international wrongdoing. We requested Levin's devices in July 2022, Judge Beeler ruled on April 7, 2023 that the devices were material to Mr. Andrade's defense, and on September 25, 2024 – after 25 briefs were filed by the parties, numerous hearings were held, and several orders were issued – the government finally handed over the Levin devices last week. Other discovery, including about Abramoff and his work for the government -- remains incomplete. And, as Mr. Andrade's counsel, we acknowledge the challenges facing the Court, given that what is described below was not immediately apparent, took a long time to ferret out, and required digging based on small clues that required considerable background.

1 4. Co-schemer and co-conspirator Jack Abramoff persuaded Mr. Andrade in June
2 2017 to do an Initial Coin Offering (“ICO”) for AML Bitcoin, before Mr. Andrade planned to do
3 so, and proceeded to enthusiastically hype and market the ICO, including arranging favorable
4 press, support from the floor of the Congress, and even a planned TV show. Exh.1 (June 19 and
5 20, 2017). WhatsApp and email communications from the image of Abramoff’s phone suggest
6 that, during the second half of 2017, he was also providing Bogolyubov advice on his legal
7 troubles stemming from his co-ownership of Privat Bank with Ukrainian businessman Igor
8 Kolomoisky, whose funds had been frozen.¹ Exh 2. (June 19, 2017).

10 5. Abramoff found himself in need of a cryptocurrency ICO on May 8, 2017, when
11 he learned from Eliezer (a.k.a. Lou) Scheiner that Gennadiy Bogolyubov needed his help.
12 Abramoff responded: “On it,” and met Scheiner the next evening for dinner to discuss the
13 situation in more detail. The two men arranged to meet in person with Bogolyubov in New York
14 City on June 7 to hash out the details of how Abramoff could assist Bogolyubov with his money
15 problems. Using the name “Steve Stephens,” Abramoff cautioned Scheiner that “we probably
16 need to be very quiet about Genady [sic].” Exh. 3.

18 6. The day before meeting Bogolyubov, on June 6, Abramoff identified AML
19 Bitcoin as one possible solution to Bogolyubov’s money problems. Abramoff proposed to Mr.
20 Andrade on June 19, 2017, that they do an ICO together. Abramoff wrote: “I was approached
21 today by one of my friends in the NY finance world who is very bullish on [ICOs] and wants me
22 to get involved, but I figured I should do so only with you, if you are into it.” Exh. 2. and
23 promptly began to entice Mr. Andrade to do so, taking steps that underscore his view that Mr.
24 Andrade was an idiot, a lamebrain and a sucker. Exh. 4. Among other things, Abramoff put
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27 ¹ See Exh. 1 (May 22, 2017).

1 together a reality TV show about AML Bitcoin, which he used as a basis to have Mr. Andrade
2 travel to Beverly Hills and meet with celebrities; he also told Mr. Andrade that Senators were
3 introducing a bill that “calls for more oversight of digital currency business activity” – legislation
4 that would have been a boon to the AML and KYC-compliant digital currency that Mr. Andrade
5 developed. Exh. 1. Using these events as an explanation, Abramoff insisted that “we need to
6 move our ICO along as quickly as we can” and “we have to get moving.” On July 13, 2017,
7 Abramoff added that he wrote a statement advocating for tighter rules on digital currencies that
8 Congressman Dana Rohrabacher (a long-time friend of Abramoff) would read on the House
9 floor; Mr. Andrade responded that Abramoff was “a genius” and that the Statement was
10 “perfect.” Throughout this hectic time, Abramoff embraced Andrade with statements such as
11 “we’re going to change the world my dear friend,” “I found a great partner!,” and repeated
12 exclamations of “so exciting!!!” Andrade responded: “I look up to you Jack. Your kids are lucky
13 to have you as a father.” Abramoff responded: “The feeling is very very mutual!” Exh. 1 (July
14 24, 2017).

17 7. Mr. Andrade shared with his friend and associate Terrence Poon his excitement
18 about the ICO Abramoff encouraged him to do and all of the hype around it, stating that “[w]e
19 are getting a letter [of] support from President of Angola next week.” A few days later, on
20 August 9, Andrade reported that “the [TV] show will happen,” that “congress is on our side,”
21 that “we will sell out the ICO,” and that “Angola which is in Africa, the president there will
22 endorse AML Bitcoin.” Poon responded, “Brother, U have found a great guy, Jack ... How did u
23 find him? ... recently I have tried to learn more about Jack. After reading more, I found he is
24 more amazing.” Mr. Andrade summed up for Poon that Abramoff’s marketing strategy consists
25 of “reality shows,” “Congress,” and “various presidents [of foreign countries] issuing [] public
26 letters of support.” Exh. 5. (Andrade-Poon, August 4 and 9, 2017).

8. Unbeknownst to Mr. Andrade, Abramoff explained to others what his real agenda was in joining forces with Mr. Andrade and pushing to do an accelerated ICO: facilitating money laundering through Angola. In an October 11, 2017 email to long-time friend Roger Engone, Abramoff sketched out a deal, the complete terms of which are not explained, but which began: “We will use digital currencies (bitcoin) to get this done. In particular, we’ll use AML Bitcoin (AML), which is the only digital currency that is designed to be accepted by governments.” Exh. 6. (October 11, 2017) He then discussed the procedure, which would include Engone getting at least two Angolan participants who designate an Angolan bank (where they have deposits) that they will use to “participate in the transaction.” *Id.* As directed by Abramoff, the designated banks must be able to transfer South African Rand to a U.S. account; each participant must sign a contract to purchase AML Bitcoin and will receive AML Bitcoin wallets; and several complicated transactions will ensue that involve transferring millions of dollars between the two participants, with AML selling one of the participants \$100 million of AML coins, and that purchaser selling \$100 million worth of AML to the second participant and then depositing \$100 million in a Dubai bank account, minus the 20% of the funds that will go to Engone. *Id.* Abramoff stated, “This approach could enable deposits of more than US\$1B per month in each Dubai account.” *Id.* On the same day, he sent Engone an AML Bitcoin Purchase Agreement. A few days later, Abramoff told Engone to let him know as soon as it was confirmed that the Angolan bank can do South African rand transfers, then email Abramoff to his printer (not his computer), and then go to Abramoff’s house “so we can take the next steps, which will be you calling my guys while I’m in the room.” *Id.* Five days later, Engone sent Abramoff a photograph of a huge stack of Angolan money piled high in an otherwise empty room, to which Abramoff responded, “Looks like my living room! Hahahaha.” *Id.* (October 16, 2017.)

1 9. Abramoff persuaded Mr. Andrade to do an ICO by hyping the opportunity,
2 working at a frenetic pace, pretending that he and Mr. Andrade were “dear friends” and
3 “partners,” excitedly issuing press releases, working on a Super Bowl Ad, writing a speech for a
4 United States Congressman to read on the Floor of the House of Representatives boosting AML
5 Bitcoin, developing a relationship with the Panama Canal, and promising a reality TV show
6 about AML Bitcoin, starring Mr. Andrade. Exh. 1.

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8 10. Abramoff tapped his close friend John Bryan to assist with putting the rejection
9 campaign together in hopes of raising awareness of AML Bitcoin. Chet Fenster, a content and
10 advertising expert, told the FBI that he was contacted by Abramoff and John Bryan to assist with
11 the Super Bowl ad. Fenster said that Bryan and Abramoff misrepresented to him how much
12 money was in the budget for an AML Bitcoin ad. Ultimately, it became clear that AML Bitcoin
13 was not going to follow through with the ideas proposed by Fenster. Exh. 7.

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15 11. On December 27 2017, Abramoff and Naimer discussed the Super Bowl and
16 Abramoff sent Naimer an AML Bitcoin Special Purpose Agreement, which was modified from
17 the usual AML Bitcoin purchase agreements and was used by Abramoff to launder money with
18 money being invested in the Super Bowl ad. Naimer said to Abramoff, in reference to Mr.
19 Andrade: “BTW, as far as he's concerned, you already raised the money for the ad...” Abramoff
20 responded: “as far as he’s concerned, the ad already ran! And we sold \$100M in the ICO in 40
21 seconds and. . . and. . . and. . .” Exh. 8.

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23 12. Also on December 27, 2017, Abramoff (using the name Steve Stephens) wrote to
24 his trusted friend and associate Alex Prasievi (a friend of Abramoff from the Republic of
25 Georgia) and informed him that he had a “guy in NYC” who had a \$1 million investor group and
26 was going to purchase 1,428,572 tokens at .70 each, sell them to the investors at .90 each and
27 keep a commission fee for \$285,715. Exh. 9. Abramoff offered to Prasievi that he could do the
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1 same if he wanted to. Abramoff then sent Prasievi an AML Bitcoin Purchase Special Purchase
2 Agreement that set forth a scheme similar to the one he had described. Abramoff sent similar
3 contracts to his friends Eli Zicherman and Richard Naimer on the same day. Abramoff and
4 Prasievi exchanged emails on January 2, 2018, regarding the opportunities for AML Bitcoin in
5 the Georgia Republic. Abramoff asked Prasievi the next day, “[A]ny progress on the Super Bowl
6 ad front?” (produced by Prasievi). Exh. 10. (January 3, 2018)

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8 13. Although the indictment suggests otherwise, Mr. Andrade had reason to believe
9 that the company could afford a Super Bowl ad because on January 13, 2018, he was told by
10 Japheth Dillman, a friend of Abramoff whom he brought into the business, that Block Bits
11 Capital was putting in an order for \$50 million worth of AML Bitcoin. Exh. 11.

12 14. Abramoff sent the final version of the Super Bowl ad to Joey Allaham on January
13 26, 2018, and added, “here is the agreement for the AML Bitcoin investment. Please keep me
14 updated on your timing for the investment.” On January 30, Abramoff asked Allaham to let him
15 know when the wire would be going out to the AML Bitcoin accounts.” After the Super Bowl
16 ad was purportedly rejected, Abramoff paid numerous writers to publish misleading articles
17 about why the ad was rejected. Brian Darling and Peter Ferrara both told the FBI that Abramoff
18 provided the content for the stories they wrote. Exh 12.

19
20 15. On January 17, 2018, Bryan sent a text message to Abramoff explaining that
21 “[t]he written proposal will pretend we really are buying a Super Bowl ad because if anybody
22 ever gets this in Discovery or something I don’t want to look like we planned to do this . . . is
23 that okay?” Abramoff responded: “Probably not the best idea. Maybe you can write it up in a
24 way that says in the even[t] NBC rejects the ad, and this is the plan . . . if you write it up the
25 other way he may not understand and rejected out of hand.” Bryan confirmed in his FBI
26 interview that he wrote the proposal pursuant to Abramoff’s guidance, sending another message
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1 stating: “Don’t worry about the way I wrote The Proposal. I wrote it so that it looks like only if
2 they reject the commercial then we do all these things but forget it is all looks fine I think I don’t
3 care if somebody gets this who cares.” Exh. 13. Also in late 2017, Abramoff not only
4 orchestrated the Super Bowl ad referenced in the indictment, but also used the financing of that
5 ad to camouflage additional money laundering schemes that would support his pro-Russia PR
6 campaign, and paid various journalists to publish false or misleading articles about the purported
7 rejection of the Super Bowl ad.

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9 16. In either a modification of what Abramoff was doing with the Angola Plan, or a
10 separate plan that also involves Angola, Abramoff also was working on an Angolan currency
11 project, “assisting a powerful family in Angola (the client) that has a large amount of Kwanzas
12 and wishes to convert them to a foreign currency.” Exh. 14.

13 17. In connection with that effort, Abramoff sent “Angolan Deal Notes” to Israeli
14 lawyer Richard Naimer (a long-time friend and business associate of Abramoff), on January 8,
15 2018. In those deal notes, Abramoff referenced a Sultan and some real estate developments that
16 would be purchased in a way that avoids “overseas remittance” guidelines, that makes it appear
17 to the banks that would be involved that what was happening was for “investment purposes,” and
18 that overstates the amount that would actually be invested. Abramoff adds that “all the banks
19 understand that the funds will be arriving in Angolan Kwanza Cash Notes.” Ex. 15.

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21 18. Messages between Abramoff and Natko Vlahovic (a Croatian lobbyist) reflect
22 that Abramoff sent Vlahovic a recording entitled “Call to Arms” in which Abramoff calls for
23 grass roots campaign across America to organize Trump voters to pressure Congress to reverse
24 what Abramoff called the “horrific” anti-Russian trends in American politics. Abramoff
25 Recording (3:35-4:10; 4:50-5:30; 7:45-9:10). (CTA recording) Abramoff and Vlahovic discussed
26 topics ranging from Russia-related work, to Vlahovic getting commissions for selling AML
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1 Bitcoin, to a statement apparently designed for an official of the Angolan government about
2 Angola exclusively accepting AML Bitcoin. While the two were working together on lobbying
3 campaigns, Abramoff introduced Vlahovic to AML Bitcoin and helped him acquire AML
4 Bitcoin tokens, ultimately resulting in Vlahovic working on the drafts of what appear to be press
5 releases for AML Bitcoin related to adoption of AML Bitcoin by the governments of Angola,
6 Slovenia, and Estonia. Exh. 16. (Nov. 8, 2017).

7
8 19. Discovery shows a pattern of Abramoff using Landfair Capital Consulting to hide
9 his wrongdoing, often falsely describing the consulting he was providing as relating to
10 cryptocurrency. The company was owned by his son Alex, who was a college student at the
11 time, and the case agents referred to the company as “the money connection” for Abramoff’s
12 activities, including those relating to AML Bitcoin. Recording 1D-39, interview of Abramoff
13 during the search of his home (Sept. 13, 2018).

14
15 20. Abramoff issued a \$750,000 invoice from Landfair Capital to Alexander Levin, a
16 pro-Russia, Ukrainian-American businessman who retained Abramoff as a consultant to assist
17 him with, among other things, efforts to interfere with Ukrainian politics based on a pro-Russia
18 agenda. A 302 report produced by the government, which is a partial review of evidence from
19 one of Abramoff’s cell phones, indicates that Levin communicated with Abramoff frequently
20 during the timeframe relevant to this case. Through those discussions, Abramoff also introduced
21 Levin to AML Bitcoin and discussed cryptocurrency more generally. Additionally, the 302
22 shows that Levin’s payments to Abramoff for his consulting services were paid into the same
23 Landfair Capital bank account Abramoff used for the Angola plan and other nefarious projects in
24 which Abramoff engaged. Exh. 17.

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26 21. Abramoff used Landfair Capital to obtain \$1.5 million in “consulting fees” from
27 Bogolyubov on August 10, 2017. Abramoff wrote to Bogolyubov’s associate Moti Korf: “I
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1 spoke yesterday with [Gennadiy Bogolyubov]. Our LA company will do a consultancy with
2 your company regarding digital currencies, providing investment guidance and opportunities.
3 The consulting fee will be \$1.5 million. . . . You will receive a W9 from the LA company -
4 Landfair Capital Consulting, Inc., and have a business expense for the consulting effort.
5 Landfair will provide periodic written reports as well.” A few weeks later, Abramoff also
6 described to Bogolyubov that he would be setting up a “C4 non-profit” to use for handling
7 certain issues. Abramoff wrote on September 1, “I can write up something generic, like
8 “supports and advocates for issues that ensure that the United States does not support corrupt
9 regimes and leaders throughout the world...” Exh. 18.

11 22. There are numerous additional people and places that are part of the international
12 crime spree in which Abramoff engaged during the time period relevant to the Indictment. He
13 was partners with his then-close friend Joey Allaham in a company called Lexington Strategies,
14 but the two spent more time arguing than plotting in their WhatsApp chats. On November 3,
15 2017, Abramoff told Allaham that he wanted to meet and discuss AML Bitcoin. “I just heard
16 that the Crown Prince of Dubai (or his investment fund, not sure) is about to purchase a huge
17 block of the coins.” Exh. 12. On January 26, 2018, Abramoff sent Allaham one of the AML
18 Bitcoin Special Purchase Agreements that was used to raise money in connection with the Super
19 Bowl ad. Allaham signed a purchase agreement for \$500,000 worth of AML Bitcoin tokens on
20 February 23, 2018. *Id.*

23 23. The government’s poor assessment of relevance in this case is well illustrated by
24 its resistance (and in some cases refusal) to produce materials relating to alleged co-schemer
25 Abramoff. For example, the government’s response to Mr. Andrade’s request for Alexander
26 Levin’s iPhone and iPad, which were seized by the Southern District of New York in connection
27 with a criminal investigation of Rudy Giuliani and others in that district, demonstrates that the
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1 government cannot and should not be trusted when it comes to evaluating what is relevant and
2 helpful to Mr. Andrade's case. Although the government repeatedly has argued that it knows of
3 no connection between Mr. Andrade's case and the case in the Southern District of New York,
4 publicized information from unsealed search warrants relating to the SDNY's investigation that
5 Giuliani was investigated for his removal of the U.S. Ambassador to Ukraine in 2019 – one of
6 the *very same pro-Russia "lobbying" activities* about which Abramoff and Levin communicated
7 in June 2018, disguising the work in an invoice as "cryptocurrency consulting." Exh. 17 at 9-10.
8 As it turns out, the so-called "lobbying" work that Abramoff discussed with Levin was just one
9 of many examples of how Abramoff worked behind Mr. Andrade's back and used Mr. Andrade's
10 company and his AML Bitcoin to disguise his own international wrongdoing and to promote his
11 pro-Russia agenda – purposes that were contrary to Mr. Andrade's intentions for his company.

12
13 24. Some of Mr. Andrade's discovery requests remain ignored. Despite that Mr.
14 Andrade's counsel has requested materials from Abramoff's informant file at least 8 times,² the
15 government responds each time that it has "produced all Abramoff material required by Rule 16,
16 *Brady, Giglio*, and the Jencks Act, and [] will continue to look for additional material that might

17
18 possibly be discoverable under those rules." Relevant and helpful documents from Abramoff's
19 informant file may include: initial or continuing Suitability Reviews, Reports, and/or
20 Recommendations of Abramoff; Instructions given to Abramoff; Documents relating to
21 Abramoff's Authority to Engage in Otherwise Illegal Activity; documents relating to
22 Abramoff's Unauthorized Illegal Activity; and Payment requests from, and approved payments
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26 ² Most recently, on September 23, 2024, defense counsel wrote: We have requested materials from Abramoff's
27 informant file numerous times, including in our January 25, 2024 motion to compel, our February 22, 2024 reply
28 brief, at the March 7, 2024 hearing, and in correspondence dated March 5, 2023, and March 18, March 24, April 1,
and June 7, 2024.

to, Abramoff for his involvement in criminal activity. The responsive documents may include classified information that, in addition to providing more connections between the wrongdoing of Abramoff and others to support the theory of Mr. Andrade's defense highlighted in this CIPA filing, could also support other defenses, including affirmative defenses. *See, e.g.*, Exh. 19, Letter from K. Dent to AUSA Highsmith (Sept. 23. 2024).

25. Delaguardia is a former Panamanian Ambassador to the United States and close friend of Abramoff. On September 15, 2017, when Carlos Delaguardia was with Andrade in Panama to discuss the possibility of the Panama Canal using AML Bitcoin, Andrade wanted to do a photo op at the Panama Canal, but Delaguardia determined it was not necessary. Reporting this to Abramoff, Delaguardia sent Abramoff a photo of Grima[ce], the grinning purple blob from McDonald Land who was an evil character, known for being stupid and for stealing milkshakes. This nickname was used repeatedly by Delaguardia to describe Mr. Andrade. Dent Decl., Exh. 4. Delaguardia, in connection with his efforts to get AML Bitcoin into Panama, created a new Panamanian company called Zentrum, and Delaguardia served as President. Abramoff tried to persuade Mr. Andrade to use the bank account of Delaguardia's new company as an escrow account to hold the money purchasers used to buy AML tokens. Mr. Andrade never accepted that offer. In addition, Abramoff appointed Delaguardia to serve as VP of Latin American affairs for Mr. Andrade's company, a role through which Delaguardia handled the AML Bitcoin communications with the Panama Canal and even authored the Panama press releases relating to AML Bitcoin. *See* Exh. 6.

26. Abramoff and his son Alex ran a company called Ghost Management. Defense counsel is still learning about the company. It appears to be part of a plan to conceal lobbying efforts. The company sent several payments to Landfair Capital Consulting, the "money connection" described above.

1 27. The government's discovery record is 1-15. On April 7, 2023, Judge Beeler
2 granted all five of the requests before her. (Dkt. # 120). The five requests focused on
3 Abramoff's international crime spree with others. On March 17, 2024, Judge Beeler ruled in Mr.
4 Andrade's favor on ten of the eleven requests in his motion to compel filed on January 25, 2024.
5 Dkt. #275. The one issue that went in favor of the government in the most recent motion to
6 compel was that it was not required to provide its 404(b) notice yet, a ruling that did not involve
7 relevance. The government has since realized that, as the defense suggested in its motion, the
8 defense would need considerable time to prepare for its proposed 404(b) material, and it
9 provided notice on September 13, 2024.
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11
12 I declare under penalty of perjury that the foregoing is true and correct, and that this
13 declaration was executed on October 3, 2024 in McLean, Virginia.
14

15 /s/ Kerrie C. Dent

16 KERRIE C. DENT
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