MICHAEL J. SHEPARD (SBN 91281)
mshepard@kslaw.com
KING & SPALDING LLP
50 California Street, Suite 3300
San Francisco, CA 94111
Telephone: +1 415 318 1200

KERRIE C. DENT (Admitted *pro hac vice*)
kdent@kslaw.com
1700 Pennsylvania Avenue, NW, Suite 900
Washington, DC 20006-4707
Telephone: +1 202 626 2394

CINDY A. DIAMOND (SBN 124995)
cindy@cadiamond.com
58 West Portal Ave #350
San Francisco, CA 94127
408.981.6307

Attorneys for Defendant
ROWLAND MARCUS ANDRADE

IN THE UNITED STATES DISTRICT COURT

IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

THE UNITED STATES OF AMERICA, Plaintiff, vs. ROWLAND MARCUS ANDRADE, Defendant.	**DECLARATION OF KERRIE C. DENT IN SUPPORT OF ANDRADE'S MOTION FOR RECONSIDERATION OF MOTION FOR AN EVIDENTIARY HEARING TO ADDRESS GOVERNMENT MISCONDUCT AND TO SEEK SANCTIONS, INCLUDING POTENTIAL DISMISSAL OF THE INDICTMENT** No. 3:20-cr-00249-RS Judge: Hon. Richard Seeborg

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 file this declaration in support of Mr. Andrade's Motion for Reconsideration of the Court's Denial of His Motion for an Evidentiary Hearing to Address Government Misconduct and to Seek Sanctions, Including Potential Dismissal of the Indictment.

2. I have personal knowledge of the evidence in this case. In addition, over the past several months, I have spoken and emailed with our proffered witnesses and/or individuals with direct knowledge of their personal situations and the information they are willing to share on the witness stand. If called as a witness in this matter, I could competently testify about these matters.

3. I am filing a motion for reconsideration of the Court's February 5, 2025 denial of Mr. Andrade's motion for an evidentiary hearing and to address the government's misconduct based on new evidence that I learned of yesterday. Specifically, I learned yesterday, in a phone call, that Agent Buma would be willing to provide more detailed evidence than he had previously indicated.

4. One of my confidential sources, who speaks directly with Agent Buma on a regular basis, informed me yesterday that Agent Buma could testify that notes taken by Jack Abramoff around May 31, 2018, while in a meeting with Ukrainian businessman Alexander Levin and Ukrainian billionaire Igor Kolomoisky, relate to two right-wing political campaigns Abramoff was running. Abramoff's two campaigns were the "Anti-Corruption" campaign (aimed at tying Joe Biden, Trump's chief political rival at the time, to corruption in Ukraine); and the "V/V" campaign (a pro-Russia, pro-Putin campaign). A key element to both campaigns was the use of media to spread the desired narrative. I was told that Agent Buma also could testify that his interpretation of Abramoff's notes is that the funding for these campaigns came, in part, from the promotion and sale of AML Bitcoin. My confidential source told me that Agent Buma has said that he would appear to provide testimony unless his employer, the FBI, intervened to prevent him from doing so.

5. I also want to clarify for the Court that the testimony of Mr. Andrade's other proffered witness, May Edwards, about "[t]he systematic suppression of information … [she] witnessed at Treasury in 2016 through 2018 included information about potential international money laundering by Jack Abramoff," also relates to this case. Her statement that Abramoff suppressed money laundering, "often us[ing] a shell company called Landfair Capital Consulting, LLC to hide the transactions," ties her testimony to this case because the Landfair Capital account, dubbed the "money connection" by the case agents when they were investigating Abramoff, was used for purchases of AML Bitcoin made by Abramoff and his fellow miscreants and for certain AML Bitcoin expenditures, and was also used to camouflage Abramoff's wrongdoing while he was working with AML Bitcoin.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on February 6, 2025, in San Francisco, California.

/s/ *Kerrie C. Dent*
Kerrie C. Dent