John M. Pierce (Bar No. 250443)
jpierce@johnpiercelaw.com
JOHN PIERCE LAW P.C.
21550 Oxnard Street, 3rd Floor
Woodland Hills, CA 91367
Tel. (321) 961-1848
Attorney for Defendant
Rowland Marcus Andrade

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROWLAND MARCUS ANDRADE,

Defendant.

Case No. 3:20-cr-00249-RS

OPPOSITION TO APPLICATION OF THE UNITED STATES FOR ORDER ISSUING FORFEITURE MONEY JUDGMENT

Judge: Hon. Richard Seeborg, Chief Judge

As his Opposition to the Application of the United States for Order Issuing Forfeiture Money Judgment (ECF 762), On October 3, 2025, Defendant requested an extension due to the fact that he still has not obtained the requested documents from the government. (ECF 773) That motion has not been ruled on.

Therefore, Defendant Rowland Marcus Andrade hereby incorporates by reference the arguments made in Section II.E. of his Corrected Defendant's Reply Regarding Bond Pending Appeal and Related Relief (ECF 777). This argument is found at ECF pages 25-27 of ECF 777 (which correspond to pages 20-22 of the document as paginated in the lower right corner)

It should be further noted that the government's financial expert was not provided with essential information necessary to produce a complete and accurate analysis. Notably, they lacked access to a list of fiat and digital currency refunds, as well as a list of individuals who sold their digital currency on exchanges — something prior counsel has already put on the record. This includes individuals such as David Mata (on behalf of Block Bits Capital), Ben Boyer, and Daniel Ahranoff.

Just as a reminder, Mata was earning between 1 to 3 bitcoins per day by selling AML Tokens — generating over $20,000 daily at the time.

Additionally, the expert was not given critical data on the sophisticated network of Abramoff-controlled proxy companies — including Pangea, Landfair Capital, and Sugar Mountain Holding — that purchased AML Tokens during the ICO. Abramoff-controlled entities and individuals contributed well over half of the funds raised during the ICO.

For example, Sugar Mountain Holding, which previous counsel already placed evidence on the record that Abramoff controlled. That account was seeded in 2015 with approximately **$225,000 in cash**, which then remained inactive for some time. (**See Ex-1**)

This timing aligns with other criminal activity Abramoff was involved in — and notably, it occurred while **Andrade's prior currency was already on Abramoff's radar** (see **Ex-2**).

Then, as confirmed by **IRS-GJ-0028710**, Sugar Mountain Holding then starts sending a lot of money to Block Bits Capital, Andrade for Aml Tokens, CCJ Strategies, Pangea and

Landfair Capital. As it relates to Landfair, See Ex.3.

There are additional transactions, but for the sake of brevity, only this subset is included as an example. If the government authorized Abramoff's conduct and his flow of money into Andrade's company, how can it be right for the government to make Andrade and maybe even his joint asset holders liable for conduct and funds that they intentionally placed in Andrade's company? This is one of the many reasons that Abramoff's informant file should be produced in order to determine what conduct Abramoff was authorized to engage in.

Lastly, it should be noted that this also serves as a **formal objection by Andrade**, on behalf of those who hold **joint assets** with him, as the government's financial miscalculations may **directly impact** those individuals as well.

DATED: October 7, 2025

Respectfully Submitted,



JOHN M PIERCE,
Attorneys for Defendant
ROWLAND MARCUS ANDRADE