

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

Attorneys for Defendant
ROWLAND MARCUS ANDRADE

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,
Plaintiff,

v.

ROWLAND MARCUS ANDRADE,
Defendant.

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

**DECLARATION OF MICHEL PARADIS IN SUPPORT OF
DEFENDANT'S MOTION FOR RECONSIDERATION**

I, Michel Paradis, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am an attorney admitted to practice in New York and the District of Columbia. I am a partner at Steptoe LLP and a Lecturer at Columbia Law School, where I have taught national security law for the past twelve years. Previously, I was an adjunct professor at Georgetown Law School, where I taught national security law courses and served as

counsel in the Department of Defense for over a decade. I hold an active Top Secret/SCI security clearance with multiple read-ons.

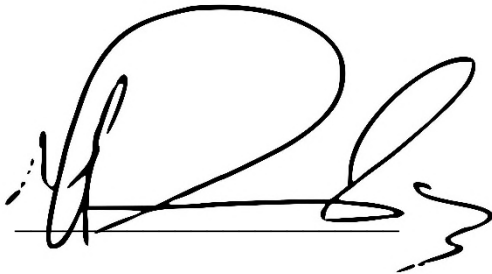
2. My appellate experience includes serving as counsel in *Al Bahlul v. United States*, 767 F.3d 1 (D.C. Cir. 2014) (en banc); *In re Al-Nashiri*, 921 F.3d 224 (D.C. Cir. 2019); and *In re United States*, 143 F.4th 411 (D.C. Cir. 2025). In these and similar cases, I have regularly handled matters requiring Top Secret/SCI security clearances and have litigated complex issues concerning the handling, disclosure, and use of classified information at trial and on appeal.
3. I have been asked by counsel for Defendant Rowland Marcus Andrade to represent him on his pending appeal before the United States Court of Appeals for the Ninth Circuit, Case No. 25-5095. I have reviewed relevant portions of the record, including the Court's orders regarding classified information (Dkt. 367), and the Ninth Circuit's order staying briefing to permit Mr. Andrade to retain specialized appellate counsel with national-security expertise (App. Dkts. 28–30).
4. Based on my review, Mr. Andrade's appeal raises significant issues under the Classified Information Procedures Act ("CIPA"), 18 U.S.C. Appendix III, and related constitutional disclosure obligations that require counsel with Top Secret/SCI security clearances and substantial experience in national-security litigation. I am willing and able to provide that representation.
5. Before I can enter an appearance and undertake representation, my firm requires payment of a retainer and reasonable assurance that sufficient funds are available to cover anticipated appellate fees and expenses.

6. Given the size and complexity of this matter, I have requested a \$500,000 retainer, based upon my estimate that litigation expenses—covering briefing, any necessary motions, potential oral argument, review of classified materials in secure facilities, and related expenses—could easily exceed \$800,000. Neither I, nor my firm is in a position to undertake the representation on a contingent or deferred-fee basis given the specialized nature and expected duration of the work.
7. I have not entered an appearance for Mr. Andrade because I have not been paid the required retainer and have not received adequate assurance that sufficient funds are available to support the representation.
8. On or about March 18, 2026, following the Court’s March 11, 2026, Order (Dkt. 828), I had a brief telephone call with Assistant United States Attorney Christiaan H. Highsmith regarding the disposition of any proceeds from Black Gold Coin, Inc. (“BGC”) that might be distributed to Mr. Andrade.
9. In that communication, the government took the position that all proceeds distributable to Mr. Andrade from BGC must first be applied in full toward satisfaction of the approximately \$2.2 million in restitution and \$8.37 million in forfeiture obligations before any portion could be directed to appellate counsel fees or any other purpose. Mr. Highsmith indicated that the government would likely oppose any effort to direct a portion of funds released to Mr. Andrade to his legal defense until such amount was set aside for the payment of his restitution and forfeiture obligations.
10. I have set forth above the substance of the government’s stated position to the best of my recollection. No written memorialization was provided by the government.

11. Prior to the Court's March 11, 2026, Order, I understand that the government had taken no position on Mr. Andrade's ability to sell untainted assets to retain appellate counsel. Before the Ninth Circuit, the government stated that it "does not seek to restrict fundraising efforts by Andrade provided such efforts are legitimate, legal, and do not impermissibly dissipate assets to which Andrade's victims are entitled." App. Dkt. 34 at 2–3. The government's post-Order demand is a material change from that prior position.
12. Based on the government's stated position, and unless the Court authorizes some portion of the proceeds from the proposed BGC transaction to be allocated to appellate counsel and litigation expenses, I will not be able to undertake representation of Mr. Andrade in the appeal.

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

Executed on April 6, 2026, at New York, NY.

A handwritten signature in black ink, appearing to read 'Michel Paradis', written over a horizontal line. The signature is stylized with a large loop and a trailing flourish.

Michel Paradis