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12 **UNITED STATES DISTRICT COURT**  
13 **CENTRAL DISTRICT OF CALIFORNIA**  
14

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 vs.

18 ROBERT HUNTER BIDEN,

19 Defendant.

**Case No. 2:23-cr-00599-MCS-1**

*Hon. Mark C. Scarsi*

**DECLARATION OF ANGELA M.  
MACHALA IN SUPPORT OF  
DEFENDANT’S MOTION TO DISMISS  
THE INDICTMENT BASED ON  
IMMUNITY CONFERRED BY HIS  
DIVERSION AGREEMENT**

Hearing Date: March 27, 2024

Time: 1:00 PM

Place: Courtroom 7C

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**DECLARATION OF ANGELA M. MACHALA**

I, Angela Machala, declare as follows:

1. I am an attorney at law licensed to practice before all courts in the State of California and am the attorney of record for Mr. Robert Hunter Biden. I have personal knowledge of the matters contained in this declaration and, if called as a witness to testify, I could and would competently testify to them.

2. I am a partner at Winston & Strawn LLP, located at 333 South Grand Avenue, Los Angeles CA 90071.

3. Attached as **Exhibit 1** is a true and correct copy of the July 26, 2023 Hearing Transcript in *United States v. Biden*, No. 1:23-mj-274-MN and No. 1:23-cr-00061-MN, before the Hon. Maryellen Noreika of the United States District Court for the District of Delaware.

4. Attached as **Exhibit 2** is a true and correct copy of the Executed Diversion Agreement filed in *United States v. Biden*, No. 1:23-cr-00061-MN (DE 69-1).

5. Attached as **Exhibit 3** is a true and correct copy of the Memorandum of Plea Agreement filed in *United States v. Biden*, No. 1:23-mj-00274-MN (DE 28).

6. Attached as **Exhibit 4** is a true and correct copy of the Declaration of Christopher J. Clark, dated December 10, 2023, filed in *United States v. Biden*, No. 1:23-cr-00061-MN (DE 60-2) and accompanying Exhibits A through T (DE 60-3 – 60-22).

7. Attached as **Exhibit 5** is a redacted copy of the July 19, 2023 Pretrial Diversion Report, signed by Margaret Bray (Chief U.S. Probation Office, District of Delaware), filed in *United States v. Biden*, No. 1:23-cr-00061-MN (DE 60-23).

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 20th day of February, 2024 in Los Angeles, California.

/s/ Angela M. Machala  
ANGELA M. MACHALA