1 2 3 4	Angela M. Machala (SBN: 224496) AMachala@winston.com WINSTON & STRAWN LLP 333 S. Grand Avenue, 38th Fl. Los Angeles, CA 90071 Telephone: (213) 615-1700 Facsimile: (213) 615-1750	
5 6 7 8	AbbeLowellPublicOutreach@winston.com Christopher D. Man CMan@winston.com WINSTON & STRAWN LLP 1901 L Street NW	
9	Facsimile: (202) 282-5100	
10	Attorneys for Robert Hunter Biden	
11		
12	UNITED STATES DISTRICT COURT	
13	CENTRAL DISTRICT OF CALIFORNIA	
14		
15	UNITED STATES OF AMERICA,	Case No. 2:23-cr-00599-MCS-1
16	Plaintiff,	Hon. Mark C. Scarsi
17	VS.	DECLARATION OF ANGELA M. MACHALA IN SUPPORT OF DEFENDANT'S MOTION TO DISMISS THE INDICTMENT FOR DUE PROCESS VIOLATIONS BASED ON OUTRAGEOUS GOVERNMENT
18	ROBERT HUNTER BIDEN,	
19	Defendant.	
20		CONDUCT
21		Hearing Date: March 27, 2024 Time: 1:00 PM
22		Place: Courtroom 7C
23		
24		
25		
26		
27		
28		

1 ||

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 A** is a true and correct copy of a May 18, 2023 email from Joseph A. Ziegler to Douglas O'Donnell, Daniel Werfel, James Lee, Guy Ficco, Michael Batdorf, Kareem Carter, and Lola Watson re "Sportsman Investigation-Removal of Case Agent," publicly released by the House Committee on Ways and Means on September 27, 2023.
- 4. Attached as **Exhibit B** is a true and correct copy of a May 19, 2023 email from Lola Watson re "Reminder-Chain of Command," released along with the interview transcript of Joseph Ziegler before the House Committee on Ways and Means, dated June 1, 2023.

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