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 13 USA PERFORMANCE TECHNOLOGY, INC.

14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA
 16 SAN FRANCISCO DIVISION

17 UNITED STATES OF AMERICA,

18 Plaintiff,

19 v.

20 WALTER LIEW, CHRISTINA LIEW, USA
 21 PERFORMANCE TECHNOLOGY, INC.,
 22 and ROBERT MAEGERLE,

23 Defendants.

Case No. CR 11-0573-JSW (NC)

**REPLY DECLARATION OF CHRISTINA
 M. BLAIS IN SUPPORT OF MOTION TO
 SEVER COUNTS 15-22 OF THE SECOND
 SUPERSEDING INDICTMENT**

Date: August 8, 2013
 Time: 2:00 p.m.
 Place: Courtroom 11, 19th Floor
 Dept.: Hon. Jeffrey S. White

1 I, CHRISTINA M. BLAIS, declare and state that:

2 1. I am an attorney licensed to practice law in the State of California and am an
3 attorney with the law firm of Keker & Van Nest LLP, located at 633 Battery Street, San
4 Francisco, California 94111, counsel for defendants Walter Liew and USA Performance
5 Technology, Inc. in the above-captioned action. I am not admitted to practice law before this
6 Court. Except where expressly stated, I have knowledge of the facts set forth herein, and if called
7 to testify as a witness thereto, could do so competently under oath.

8 2. I am informed and believe that, on May 31, 2013, United States Attorney Melinda
9 Haag and Assistant U.S. Attorneys John H. Hemann and Peter Axelrod sent my colleagues
10 Simona A. Agnolucci and Stuart L. Gasner a letter regarding the government's identification of
11 items that it intends to use in its case-in-chief at trial, pursuant to Fed. R. Crim P. 16(a)(1)(E)(ii).
12 Exhibit B to the June 27, 2013 Declaration of Joshua D. Maremont in Support of Motion to Sever
13 Counts 15-22 of the Second Superseding Indictment (Dkt. 360-2) is a true and correct copy of the
14 May 31, 2013 correspondence without the attachments.

15 3. I have reviewed Attachment C to the May 31, 2013 letter. Attachment C lists 65
16 bank accounts. Additionally, Attachment C lists Mega International Commercial Bank and wire
17 transfers from the Bank of China, but does not list specific transactions or accounts for Mega
18 International Commercial Bank or the Bank of China wire transfers.

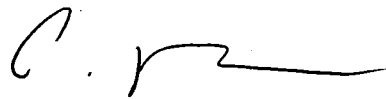
19 4. Staff working under my direction has tallied 5,077 documents that the government
20 has produced related to subpoenas to financial institutions.

21 5. I have reviewed the IRS's May 16, 2013 production labeled C2-001956 through
22 C2-003517. This production contains tax-related records and documents, and the production has
23 a total of 1562 pages.

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1 6. I have reviewed the FBI FD-302 transcriptions ("302s" hereafter) within the Bates
2 range C2-000267 and C2-001569, produced on or about April 10, 2013. Based on my review at
3 least 23 of those 302s relate to banks, bank accounts, bank statements, or banking transactions.
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5 I declare under penalty of perjury under the laws of the United States that the foregoing is
6 true and correct to the best of my knowledge, and that this declaration was executed on July 19,
7 2013 at San Francisco, California.
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12 CHRISTINA M. BLAIS
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