

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

v.

MILES GUO,

Defendant.

FILED PARTIALLY UNDER SEAL

Case No. 1:23-CR-118-1 (AT)

**DECLARATION OF DANIEL J.
POHLMAN ACCOMPANYING
DEFENDANT'S OPPOSITION
TO THE GOVERNMENT'S
RENEWED MOTION *IN LIMINE* TO
EXCLUDE EXPERT TESTIMONY**

I, DANIEL J. POHLMAN, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an attorney at the law firm Pryor Cashman LLP and am counsel for Defendant Ho Wan Kwok in the above-captioned matter.

2. I submit this declaration in opposition to the government's Renewed Motion *In Limine* To Exclude the Testimony of Defendant's Expert Witnesses (Dkt. Nos. 272, 322) and to transmit to the Court true and correct copies of the following documents.

3. A true and correct copy of the expert disclosure of Raymond J. Dragon, dated April 1, 2024, is attached hereto as **Exhibit A**.

4. A true and correct copy of valuation analysis report prepared by Alvarez & Marsal Valuation Service, LLC, dated December 15, 2020, and bearing the beginning Bates No. GTV-SEC-00149527 is attached hereto as **Exhibit B**.

5. A true and correct copy of the expert disclosure of Maggie Sklar, dated April 1, 2024, is attached hereto as **Exhibit C**.

6. A true and correct copy of the expert disclosure of Dr. Amin Shams, dated April 1, 2024, is attached hereto as **Exhibit D**.

7. A true and correct copy of Exhibit A to the supplemental expert disclosure of Thomas Bishop, dated April 29, 2024, is attached hereto as **Exhibit E**.

8. A true and correct copy of the expert disclosure of Thomas Bishop, dated April 1, 2024 is attached hereto as **Exhibit F**.

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

Executed on May 6, 2024.



Daniel J. Pohlman
*Counsel for Defendant
Ho Wan Kwok*