UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, Plaintiff, v. APPROXIMATELY 225,364,961 USDT, Defendant *in rem*,	Case No. 25-cv-1907 **VERIFIED CLAIMS OF VICTIM-CLAIMANTS IDENTIFIED IN SCHEDULE A**

Claimants identified in Schedule A ("Claimants"), hereby submit these Verified Claims pursuant to Federal Rules of Civil Procedure, Rule G(5) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, and assert their interests in approximately 225,364,961 Tether ("USDT") seized from seven virtual currency addresses, ending -3246, -fe16, -aad0, -d5a8, -f26b, -f6ce, and d7fb (collectively, the "Defendant Property") as defined in the United States' Verified Complaint for Forfeiture filed with this Court on June 18, 2025 (the "Complaint"), and allege as follows:

1. Claimants, and the amount of the Defendant Property each asserts an interest in, are each identified pseudonymously in Schedule A.[1]

2. Claimants each have an interest in a portion of the Defendant Property.

3. Claimants' interests are as lawful owners and/or beneficiaries of a constructive trust.

4. Claimants each have such an interest in the Defendant Property. Each Claimant held a lawful ownership interest in the Defendant Property at the time it was stolen from them. No

[1] Concurrent with this claim, Claimants have submitted a motion to proceed under pseudonyms and to seal Claimants' verifications, which include Claimants' full names. Claimants reserve the right to file amended claims should the Court not grant this motion.

Claimant has ever voluntarily transferred, assigned, or abandoned their lawful ownership interest in the Defendant Property, and each Claimant continues to hold their lawful ownership interest in the Defendant Property.

5. Each Claimant was a victim of the criminal offenses underlying the forfeiture of the Defendant Property. Specifically, each Claimant fell victim to the scheme the Complaint describes.[2] This sort of scheme is unfortunately common and, on information and belief, results in the theft of hundreds of millions of dollars in virtual currency annually. Perpetrators convinced Claimants to download and use what appeared to be legitimate mobile banking or investment applications meant for cryptocurrency trading. These apps, in reality, were not connected to any legitimate developer, financial institution, or other organization. Malicious perpetrators created and controlled the apps and presented a façade of fake balances and transactions that appeared real. Claimants each deposited their virtual currency at the perpetrators' direction under the belief that they were sending funds to a legitimate exchange platform. Claimants believed, based on the perpetrators' misrepresentations, that they would maintain custody and control of their virtual currency funds. (*See, e.g.*, ECF No. 1, at 40, ¶¶ 46.) Instead, however, the perpetrators stole Claimants' funds.

[2] While Claimants recognize the scheme described in the Complaint and have evidence to show that they are the proper owners of funds included in Defendant Property, Claimants reserve their right to contest certain of the Complaint's allegations and do not admit them.

Dated: October 3, 2025

Respectfully submitted,

By: */s/ Rafael Yakobi*

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Attorneys for Claimants Identified in Schedule A

SCHEDULE A

Claimant No.	Claimant	Amount Claimed
1	A.A.	$223,390
2	A.G.	$647,545
3	A.W.	$97,270
4	A.T.	$302,780
5	A.G.	$80,458
6	A.W.	$652,960
7	A.K.	$42,089
8	A.K.	$366,926
9	A.A.	$480,378
10	A.T.	$582,194
11	B.B.	$1,564,790
12	B.E.	$893,758
13	B.M.	$273,151
14	B.B.	$321,610
15	C.S.	$1,087,959
16	C.H.	$234,624
17	C.B.	$723,583
18	C.A.	$282,684
19	D.F.	$71,750
20	D.L.	$227,618
21	D.T.	$230,202
22	D.S.	$5,685,886
23	D.T.	$550,168
24	D.C.	$401,676
25	D.N.	$190,740
26	E.H.	$302,300
27	E.S.	$236,870
28	E.L.	$79,593
29	F.T.	$226,170
30	F.S.	$1,500,663
31	G.S.	$5,316,194
32	G.V.	$271,937

Claimant No.	Claimant	Amount Claimed
33	G.G.	$1,782,306
34	G.K.	$90,934
35	H.V.	$430,249
36	J.S.	$522,162
37	J.A.	$4,787,499
38	J.M.	$96,159
39	J.A.	$196,325
40	J.M.	$216,586
41	J.N.	$95,398
42	J.L.	$240,600
43	J.B.	$342,500
44	J.E.	$1,135,176
45	J.M.	$907,160
46	J.B.	$915,753
47	J.B.	$152,150
48	J.L.	$172,254
49	J.G.	$287,244
50	J.B.	$250,300
51	K.W.	$4,464,393
52	K.S.	$1,024,098
53	K.M.	$171,100
54	K.F.	$628,287
55	K.C.	$345,220
56	K.O.	$174,200
57	L.M.	$182,307
58	L.S.	$185,128
59	L.R.	$81,419
60	M.A.	$33,253
61	M.M.	$82,620
62	M.L.	$55,040
63	M.M.	$592,460
64	M.N.	$846,775
65	M.S.	$102,455

Claimant No.	Claimant	Amount Claimed
66	M.B.	$246,522
67	M.C.	$176,031
68	M.M.	$45,735
69	M.S.	$119,680
70	M.S.	$148,088
71	M.T.	$435,700
72	N.K.	$761,043
73	N.S.	$211,800
74	N.L.	$269,900
75	P.P.	$723,635
76	P.S.	$48,250
77	P.L.	$510,677
78	P.A.	$687,618
79	Q.H.	$407,869
80	R.M.	$728,239
81	R.K.	$881,275
82	R.Y.	$461,943
83	R.P.	$685,275
84	R.S.	$208,800
85	R.T.	$305,470
86	R.B.	$628,300
87	R.F.	$86,364
88	R.F.	$212,404
89	R.B.	$593,708
90	R.S.	$658,203
91	R.G.	$350,824
92	S.T.	$113,700
93	S.T.	$357,058
94	S.S.	$514,072
95	S.G.	$491,786
96	S.V.	$448,579
97	S.L.	$627,850
98	S.T.	$297,903

Claimant No.	Claimant	Amount Claimed
99	S.Y.	$100,982
100	S.S.	$2,945,056
101	S.L.	$832,193
102	S.R.	$83,083
103	S.K.	$1,457,281
104	S.R.	$90,990
105	T.S.	$213,438
106	T.T.	$97,200
107	T.G.	$268,372
108	T.B.	$2,241,528
109	T.R.	$493,992
110	T.L.	$53,371
111	W.C.	$222,812
112	W.B.	$253,984
113	W.R.	$267,709
114	W.P.	$698,353
115	X.Y.	$99,337
116	X.C.	$211,801
117	Y.S.	$233,562
118	Y.C.	$122,230

SCHEDULE B

This Schedule contains verified claimant signatures. A complete version is being submitted under seal contemporaneously with a motion to seal pursuant to LCvR 5.1(h). The public version contains only this notation.