**IN THE UNITED STATES DISTRICT COURT**
**FOR THE DISTRICT OF COLUMBIA**

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| UNITED STATES OF AMERICA,<br><br>Plaintiff,<br><br>*v.*<br><br>APPROXIMATELY 225,364,961 USDT,<br><br>Defendant in rem. | Case No. 1:25-cv-1907 |

**DECLARATION OF RAFAEL YAKOBI**

I, Rafael Yakobi, declare under penalty of perjury:

1. I am an attorney licensed to practice law in the State of California and admitted pro hac vice in this matter. I am the owner of The Crypto Lawyers PLLC and counsel of record for the Victim Claimants identified in Schedule A to the Verified Claims filed in this action ("Victim Claimants"). I make this declaration in support of the Victim Claimants' motion to transfer venue to the United States District Court for the Northern District of California. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. California is home to 22 Victim Claimants. This accounts for approximately 20.58% of the Victim Claimants. The 22 California Victim Claimants claim approximately $14.4 million in stolen USDT. Multiple of the California Victim Claimants reside in the Northern District of California.

3. Including the neighboring states around California (Arizona, Colorado, Nevada, Oregon, and Washington), there are 31 total Victim Claimants with aggregate losses of approximately $17.1 million in California and these neighboring states.

4. There is one Victim Claimant residing in the District of Columbia, claiming $171,000 in USDT.

5. In jurisdictions within 100 miles of D.C. (Delaware, Maryland, Pennsylvania, New Jersey, and Virginia) there are 16 Victim Claimants account for approximately $7.1 million in losses. The number of Victim Claimants within 100 miles of D.C., not including New Jersey, constitutes 10 claimants with losses totaling approximately $3 million.

6. During our meet and confer with the government prior to filing this motion, my colleagues and I asked the government if the res at issue is physically in the District of Columbia, if it was held in a centralized digital asset exchange, or if its private keys were held on a hardware wallet. We have not received a response.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 7, 2025, in Las Vegas, Nevada..

Dated: November 7, 2025

Respectfully submitted,

By: */s/ Rafael Yakobi*

**THE CRYPTO LAWYERS PLLC**
Rafael Yakobi (CA Bar No. 312421)
(Admitted *pro hac vice*)
848 Brickell Avenue, Penthouse 5
Miami, Florida 33131
Telephone: 619.317.0722
rafael@thecryptolawyers.com

*Attorney for Claimants Identified in Schedule A*