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. 1:25-cv-01907-AHA
CLAIMANTS IDENTIFIED IN SCHEDULE A, Claimants.	

SCHEDULE A CLAIMANTS' ANSWER TO
VERIFIED COMPLAINT FOR FORFEITURE IN REM

COMES NOW the Claimants Identified in Schedule A ("Claimants") by and through their undersigned counsel and hereby answer to the Verified Complaint for Forfeiture filed by Plaintiff United States of America as follows:

I. PRELIMINARY STATEMENT

Claimants have previously filed timely Verified Claims in accordance with Supplemental Rule G(5)(a), asserting their interests in the defendant asset *in rem* here (the "Defendant Property," as defined in the United States' Verified Complaint for Forfeiture filed with this Court on June 18, 2025), as follows:

a. 225,364,961 USDT.

Pursuant to Supplemental Rule G(5)(b), Claimants now submit this Answer to the Complaint for Forfeiture and state as follows:

II. RESPONSES TO ALLEGATIONS OF THE COMPLAINT

STATEMENT OF THE CASE

1. Admit that Claimants' funds were "stole[n]," but otherwise this paragraph states a legal conclusion to which no response is required. To the extent a further response is required, Claimants deny the allegations in this paragraph.

2. Admit that Claimants are victims of the criminal activity as generally described in the Complaint, but otherwise this paragraph states a legal conclusion to which no response is required. To the extent a further response is required, Claimants deny the allegations in this paragraph.

JURISDICTION AND VENUE

3. This paragraph states a legal conclusion to which no response is required. To the extent a further response is required, Claimants deny the allegations in this paragraph.

4. This paragraph states a legal conclusion to which no response is required. To the extent a further response is required, Claimants deny the allegations in this paragraph.

5. This paragraph states a legal conclusion to which no response is required. To the extent a further response is required, Claimants deny the allegations in this paragraph.

NATURE OF THE ACTION AND STATUTORY BASIS FOR FORFEITURE

6. This paragraph states a legal conclusion to which no response is required. To the extent a further response is required, Claimants deny the allegations in this paragraph.

7. This paragraph states a legal conclusion to which no response is required. To the extent a further response is required, Claimants deny the allegations in this paragraph.

8. This paragraph states a legal conclusion to which no response is required. To the extent a further response is required, Claimants deny the allegations in this paragraph.

9. This paragraph states a legal conclusion to which no response is required. To the extent a further response is required, Claimants deny the allegations in this paragraph.

10. This paragraph states a legal conclusion to which no response is required. To the extent a further response is required, Claimants deny the allegations in this paragraph.

11. This paragraph states a legal conclusion to which no response is required. To the extent a further response is required, Claimants deny the allegations in this paragraph.

12. This paragraph states a legal conclusion to which no response is required. To the extent a further response is required, Claimants deny the allegations in this paragraph.

13. This paragraph states a legal conclusion to which no response is required. To the extent a further response is required, Claimants deny the allegations in this paragraph.

14. This paragraph states a legal conclusion to which no response is required. To the extent a further response is required, Claimants deny the allegations in this paragraph.

PROPERTY INFORMATION

15. Claimants are without information or knowledge sufficient to form a belief as to the truth of the allegations contained in this paragraph of the Complaint and, therefore, deny the allegations in this paragraph.

16. Claimants are without information or knowledge sufficient to form a belief as to the truth of the allegations contained in this paragraph of the Complaint and, therefore, deny the allegations in this paragraph.

BACKGROUND ON VIRTUAL CURRENCY

17. Admit.

18. Admit.

19. Claimants admit that blockchain transactions can be traced to determine which virtual currency are sending and receiving particular virtual currency and that such processes

may be reliable, but deny that such processes are specific or limited to law enforcement. Claimants otherwise are without information or knowledge sufficient to form a belief as to the truth of the allegations contained in this paragraph of the Complaint and, therefore, deny the allegations in this paragraph.

20. Admit.

21. Admit.

22. Admit.

23. Admit.

24. Admit.

25. Admit.

26. Admit.

27. Admit.

28. Admit.

29. Admit.

30. Admit.

31. Claimants admit that victims of the fraud schemes alleged typically believe the fraudulent investment platforms to be legitimate, but otherwise are without information or knowledge sufficient to form a belief as to the truth of the allegations contained in this paragraph of the Complaint and, therefore, denydeny the allegations in this paragraph.

32. Admit.

33. Admit.

34. Claimants are without information or knowledge sufficient to form a belief as to the truth of the allegations contained in this paragraph of the Complaint and, therefore, denydeny the allegations in this paragraph.

35. Claimants are without information or knowledge sufficient to form a belief as to the truth of the allegations contained in this paragraph of the Complaint and, therefore, deny the allegations in this paragraph.

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37. Admit.

38. Admit.

39. Admit.

40. Admit.

41. Admit.

42. Admit.

43. Admit.

44. Admit.

STATEMENT OF FACTS

45. Claimants are without information or knowledge sufficient to form a belief as to the truth of the allegations contained in this paragraph of the Complaint and, therefore, deny the allegations in this paragraph.

46. Claimants are without information or knowledge sufficient to form a belief as to the truth of the allegations contained in this paragraph of the Complaint and, therefore, deny the allegations in this paragraph.

47. Claimants admit that the 144 OKX Accounts are believed by plaintiff to be controlled by a group of cryptocurrency confidence scam actors and/or their money laundering co-conspirators, but are otherwise without information or knowledge sufficient to form a belief as to the truth of the allegations contained in this paragraph of the Complaint and, therefore, deny the allegations in this paragraph.

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ANALYSIS OF INTERMEDIARY ADDRESSES CONSOLIDATING VICTIM FUNDS

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GAS FEE ANALYSIS & CONNECTIONS,
INCLUDING TO SUBJECT VIRTUAL CURRENCY ADDRESSES

188. Claimants are without information or knowledge sufficient to form a belief as to the truth of the allegations contained in this paragraph of the Complaint and, therefore, deny the allegations in this paragraph.

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LAUNDERING AND TRACING EXAMPLE FROM AN INITIAL VICTIM DEPOSIT ADDRESS TO A SUBJECT VIRTUAL CURRENCY ADDRESS

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THE SUBJECT VIRTUAL CURRENCY ADDRESSES

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COUNT ONE – FORFEITURE OF DEFENDANT PROPERTY

241. Claimants re-allege and incorporate their answers to the preceding paragraphs as though fully set forth herein.

242. This paragraph states a legal conclusion to which no response is required. To the extent a further response is required, Claimants deny the allegations in this paragraph.

243. This paragraph states a legal conclusion to which no response is required. To the extent a further response is required, Claimants deny the allegations in this paragraph.

COUNT TWO – FORFEITURE OF DEFENDANT PROPERTY

244. Claimants re-allege and incorporate their answers to the preceding paragraphs as though fully set forth herein.

245. This paragraph states a legal conclusion to which no response is required. To the extent a further response is required, Claimants deny the allegations in this paragraph.

246. This paragraph states a legal conclusion to which no response is required. To the extent a further response is required, Claimants deny the allegations in this paragraph.

AFFIRMATIVE DEFENSES

1. Claimants are innocent owners pursuant to 18 U.S.C. §983(d).
2. The forfeiture of Claimants' property would violate the Excessive Fines clause of the Eighth Amendment.
3. Claimants reserve the right to plead additional defenses which may become known or available during the course of discovery, as well as to dismiss any defenses which, as a result of discovery, are determined to be unsupported by good-faith reliance upon either the Complaint or the law, or a nonfrivolous argument for the extension, modification, or reversal of existing law or the establishment of new law

Dated: November 7, 2025

Respectfully submitted,

By: */s/ Michael Burshteyn*

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*Admitted *Pro Hac Vice*

Counsel for
Claimants Identified in Schedule A

CERTIFICATE OF SERVICE

I certify that on November 7, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notice of such filing to all counsel of record.

/s/ Michael Burshteyn
Michael Burshteyn