UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, Plaintiff, v. APPROXIMATELY 225,364,961 USDT Defendant *in rem.*	Civil Action No. 25-cv-1907-AHA

NOTICE OF ADOPTION

The Claimants identified in Schedule A of their Verified Claims hereby file this Notice of Adoption, joining in with the 118 other Victim-Claimants who are seeking to proceed in this matter using pseudonyms and sealing their identities from the public record. See Dk. 15.

Exposing Claimants' identities could cause a significant risk of revictimization by the same or similar bad actors who have already caused these Claimants to suffer extreme financial and emotion harm. As argued by other Victim-Claimants in this matter, a significant number of the Claimants are elderly and are already at risk of being targeted by nefarious actors. Permitting Claimants to proceed under pseudonyms protects Claimants in this vulnerable age group. Moreover, there is no prejudice to the United States as the Claimants will file under seal their full verifications with their full names.

I. Conclusion

For the reasons stated above, Claimants respectfully request that the Court permit Claimants to proceed under pseudonyms in this action, permitting Claimants to file the verifications of their Claims under seal within seven days of any order by this Court authorizing such sealed filing.

Date: December 19, 2025,

Respectfully submitted,

By: */s/ Marlene J. Goldenberg*
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Attorneys for Claimants

CERTIFICATE OF SERVICE

I, Marlene J. Goldenberg, hereby certify that the foregoing document, filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on December 19, 2025.

/s/ Marlene J. Goldenberg

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