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

VERIFIED CLAIMS OF VICTIM-CLAIMANTS IDENTIFIED IN SCHEDULE A

Pursuant to Rule G(5) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, the Claimants listed in Schedule A submit their Verified Claims to assert their interests in the assets seized by the United States and held in seven OKX wallets ("Defendant Property"), as described in the Verified Complaint ("Complaint") filed on June 18, 2025.[1]

In support, Claimants allege as follows:

1. Each Claimant and the corresponding amount of Defendant Property claimed are identified by pseudonym in Schedule A, attached hereto.[2]

2. Each Claimant asserts a lawful ownership or beneficiary interest in a portion of the Defendant Property. At the time of the theft, each Claimant held a valid ownership interest in the Defendant Property, which has never been voluntarily assigned or abandoned. Claimants remain the lawful owners of their respective interests.

[1] By agreement, Claimants were permitted an extension up until today to file their Verified Claims.
[2] Claimants have filed a motion to proceed under pseudonyms and to seal each Claimant's verifications, including full names. If the Court does not grant this motion, Claimants reserve the right to submit amended Claims.

3. The Claimants are victims of the same criminal offenses underlying the forfeiture. They were deceived into using fraudulent investment applications, believing they were engaging with legitimate cryptocurrency trading platforms. In reality, these applications were controlled by perpetrators who misrepresented balances and transactions, ultimately stealing the Claimants' funds by directing deposits into wallets under the criminal enterprise's control.

4. Blockchain tracing has confirmed that each Claimant's stolen cryptocurrency was laundered through a network of wallets associated with the Defendant Property owners or their co-conspirators. Database comparison was performed identifying that the same wallets used to steal Claimants' assets were also implicated in the United States civil forfeiture action.

5. While the United States' initial tracing provided comprehensive information and forms the overwhelming support for the vast majority of these claims, there were a small number of Claimants who undertook additional blockchain analysis, including reverse blockchain tracing, to identify additional wallets used by the perpetrators in the government's action that Claimants' were able to confirm were also used to funnel their stolen assets.

6. This analysis of each Claimant's claim establishes that a distinct and identifiable portion of the Defendant Property represents the proceeds of the Claimants' stolen assets.

7. The Claimants did not voluntarily transfer ownership of their assets, nor were they involved in any unlawful conduct. As innocent owners under 18 U.S.C. § 983(d), Claimants possess superior ownership rights to the property derived from their stolen cryptocurrency.

8. This filing constitutes a Verified Claim asserting direct ownership, not a discretionary petition for remission. However, should any claim be denied in whole, or in part, Claimants request that this Verified Claim be converted into a Verified Petition for Remission.

Respectfully Submitted,

Date: December 19, 2025

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CERTIFICATE OF SERVICE

I, Marlene Jaye 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.

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Attorney for Claimants

SCHEDULE A

Claimant No.	Claimant Initials	Claim Form Losses
1	A.A.	$1,400,000.00
2	R.M.A.	$435,721.00
3	W.B.A.	$112,750.24
4	F.B.	$298,746.00
5	C.M.B.	$460,000.00
6	W.T.B.	$470,443.71
7	R.M.B.	$215,093.84
8	R.B.	$171,344.98
9	R.S.B.	$107,802.80
10	L.B.	$854,975.00
11	M.E.B.	$436,027.00
12	K.V.B.	$447,816.32
13	R.B.	$1,800,000.00
14	K.A.B.	$734,800.00
15	V.A.B.	$197,893.13
16	R.C.	$130,000.00
17	C.N.C.	$221,585.00
18	A.C.	$1,167,578.34
19	J.C.	$590,000.00

20	D.J.C.	$1,400,000.00
21	A.C.	$121,038.00
22	M.C.	$341,199.71
23	C.K.C.	$130,000.00
24	B.E.C.	$735,071.67
25	M.D.	$577,099.95
26	S.D.D.	$614,692.00
27	B.D.	$361,905.00
28	S.D.	$591,808.23
29	S.J.D.	$192,093.34
30	A.M.D.	$239,759.35
31	K.D.D.	$210,000.00
32	S.N.E.	$531,000.00
33	L.M.E.	$294,215.00
34	D.F.	$252,578.48
35	D.F.	$782,890.28
36	M.G.	$240,000.00
37	A.Y.G.	$519,320.00
38	F.G.	$601,103.42
39	R.S.G.	$650,000.00
40	H.G.	$1,069,414.49

41	D.K.H.	$379,301.06
42	A.H.	$165,000.00
43	J.F.H.	$1,700,000.00
44	M.S.H.	$761,098.41
45	J.T.H.	$758,704.00
46	C.C.H.	$450,014.00
47	J.H.	$771,803.00
48	Z.J.H.	$187,000.00
49	A.I.	$681,000.00
50	K.N.I.	$307,730.00
51	H.J.	$182,278.00
52	D.L.J.	$2,214,685.00
53	J.O.J.	$689,000.00
54	P.J.	$259,956.00
55	T.K.	$380,000.00
56	N.L.	$471,400.74
57	L.J.L.	$549,185.53
58	A.D.L.	$287,985.59
59	M.A.L.	$261,245.55
60	L.O.T.L.	$1,422,310.03
61	D.L.	$564,000.00

62	G.J.L.	$1,374,436.52
63	R.K.L.	$260,218.53
64	K.L.	$1,389,307.44
65	V.L.	$491,722.00
66	L.L.	$281,534.71
67	Y.L.	$5,187,475.16
68	C.H.L.	$197,980.00
69	J.L.	$294,759.47
70	X.L.	$362,120.48
71	T.G.M.	$545,811.00
72	J.E.M.	$168,670.00
73	J.A.M.	$344,368.71
74	G.M.	$1,206,988.10
75	R.G.M.	$247,970.35
76	D.M.	$439,757.52
77	Z.M.	$828,098.19
78	C.M.	$1,339,432.00
79	G.C.M.	$436,580.00
80	D.M.	$298,000.00
81	D.M.	$186,000.00
82	R.S.N.	$782,890.28

83	D.N.	$182,026.00
84	C.H.N.	$698,287.00
85	J.P.N.	$418,786.73
86	D.N.	$391,985.00
87	V.D.N.	$183,861.45
88	J.A.N.	$300,000.00
89	M.A.O.	$862,318.73
90	C.O.	$262,748.26
91	M.P.	$304,079.55
92	M.A.P.	$250,858.59
93	K.P.	$334,543.09
94	K.P.	$291,669.00
95	M.P.	$319,682.00
96	C.S.P.	$226,213.00
97	I.P.	$894,000.00
98	K.R.P.	$172,000.00
99	J.J.P.	$1,400,000.00
100	E.R.	$2,300,000.00
101	H.R.	$1,282,168.87
102	J.J.R.	$287,933.00
103	D.R.	$453,471.17

104	R.J.R.	$5,000,000.00
105	S.M.S.	$320,000.00
106	A.S.	$133,972.01
107	N.D.S.	$221,998.00
108	K.S.	$1,101,106.00
109	S.A.S.	$309,015.13
110	T.S.S.	$1,795,237.59
111	R.S.	$127,000.00
112	C.S.	$62,409.70
113	M.A.S.	$210,407.00
114	D.E.S.	$156,678.00
115	W.S.	$675,000.00
116	S.S.	$344,500.00
117	E.J.S.	$229,896.00
118	J.S.	$10,000,000.00
119	J.O.T.	$968,186.00
120	A.F.T.	$1,059,950.00
121	J.T.T.	$505,381.00
122	L.T.	$2,000,000.00
123	R.T.	$400,000.00
124	K.U.	$185,722.08

125	L.S.V.	$325,000.00
126	R.S.V.	$253,848.98
127	D.M.V.	$422,922.04
128	K.V.	$242,249.85
129	C.V.	$347,537.71
130	R.A.W.	$201,574.00
131	M.L.W.	$650,000.00
132	L.T.W.	$1,159,889.56
133	D.L.W.	$192,780.74
134	J.P.E.W.	$117,551.85
135	H.W.	$178,687.53
136	C.Y.	$159,461.72
137	S.Y.	$1,197,811.09
138	V.Y.	$399,398.68
139	A.L.Y.	$890,937.66
140	J.Z.Y.	$294,215.00
141	S.Y.Y.	$197,609.01
142	J.Z.	$495,000.00
143	Z.Z.	$1,500,000.00
144	M.D.Z.	$707,028.63
145	P.R.N.	$297,438.31

146	L.Z.B.	$78,336.73
147	K.B.X.	$360,000.00