EXHIBIT A

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

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

PLAINTIFF UNITED STATES OF AMERICA'S FIRST SET OF SPECIAL INTERROGATORIES TO CLAIMANT INFINIWEB

Plaintiff, United States of America, pursuant to Rule G(6)(a) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions hereby propounds the following special interrogatories to be answered under an oath within twenty-one (21) days of service hereof.

DEFINITIONS

The property subject to forfeiture, namely "Approximately 225,364,961 USDT," is hereinafter referred to as "Defendant Property."

"Scammer" and "perpetrator" refers to the wrongdoers behind the cryptocurrency confidence scheme.

SPECIAL INTERROGATORY NO. 1:

State current and all prior names of any and all board member(s), owner(s), director(s), and/or executive officers, employed by Infiniweb in the last five years, including aliases or nicknames, dates and places of birth, Social Security or foreign equivalent numbers, visa or green card numbers, current address, and all addresses for the last five (5) years. For each address, please list the inclusive months and years you or your spouse lived at each address.

SPECIAL INTERROGATORY NO. 2:

If any and all board member(s), owner(s), director(s), and/or executive officers, employed with Infiniweb over the last five years, has ever been arrested or convicted of a crime in any country, please state the date of the arrest or conviction, the charges, the name and address of the court in which they were convicted, the offense they were charged with or were convicted of, and the sentence or other outcome. If probation was imposed, list the time during which you were under probation and the name, address, and telephone number of their probation officer. If they were incarcerated, list the institution where you were incarcerated and the period of time during which they were incarcerated. If they were paroled, list the date of your parole and the name, address, and telephone number of their parole officer. If they have been charged in a criminal case which is currently pending before any court, please state the date of arrest, the charges(s), the name and address of the court in which you were charged, and provide the current status of the court case, including whether a guilty plea has been entered.

SPECIAL INTERROGATORY NO. 3:

Identify the states, provinces, and foreign countries in which any and all board member(s), owner(s), director(s), and/or executive officers, within the last five years, have obtained a driver's license, driving permit, passport, or state identification, including, where applicable, the license, permit, or identification number, and state whether the license, permit, or identification is currently valid.

SPECIAL INTERROGATORY NO. 4:

In your claim filed on October 3, 2025, you state under penalty of perjury that you assert a "lawful ownership interest in the Defendant Property." The term "owner" is defined for purposes of this action in 18 U.S.C. § 983(d)(6). With reference to that definition, please state the nature of your ownership interest.

SPECIAL INTERROGATORY NO. 5:

State in detail the circumstances in which you acquired your ownership interest in the Defendant Property, including but not limited to, the following: 1) the date, time and place in which you acquired the currency, 2) which wallet, platform, service, or application you used to purchase the Defendant Property, 3) the manner in which the currency was delivered to your possession, 4) any usernames, IDs, emails, and/or phone numbers you used that are associated with any wallet, platform, or application; and 5) identify each transaction hash traceable to the Defendant Property.

SPECIAL INTERROGATORY NO. 6:

If you have any records, documents, or tangible items that document or relate in any way to your response to Interrogatory No. 5, or are otherwise relevant to your interest in the Defendant Currency or your claim to the Defendant Currency, identify each piece of evidence with specificity, including the name, address, and telephone number of its custodian. In lieu thereof, you may produce copies of the records, documents, or tangible items.

SPECIAL INTERROGATORY NO. 7:

In your verified claim, you state that "the company operates multiple online gaming platforms, including both websites and mobile applications primarily servicing Chinese-language speakers in Asia." Please identify every gaming platform, website, and mobile application Infiniweb Operates. If this is a website, please provide the website link. For mobile applications, please identify the location where a person may download the application.

SPECIAL INTERROGATORY NO. 8:

Please state the names and current addresses and telephone numbers of all persons known or believed by you to have knowledge of or information pertaining to your ownership of the Defendant Currency, including persons employed by Infiniweb and third parties.

SPECIAL INTERROGATORY NO. 9:

Please provide any licenses Infiniweb obtained to operate the online gaming platforms within the last five years.

SPECIAL INTERROGATORY NO. 10:

If you are claiming that any portion of the Defendant Property belongs to a third party, state the name of such third party and the amount that belongs to them.

SPECIAL INTERROGATORY NO. 11:

If any portion of the Defendant Property belongs to a third party, state the reason you were in possession of such portion of the Defendant Property and the date you took possession of such portion of the Defendant Property.

SPECIAL INTERROGATORY NO. 12:

Please identify all cryptocurrency wallets owned or controlled, directly or indirectly, by Infiniweb within the last five years and identify the date Infiniweb acquired that control or ownership.

SPECIAL INTERROGATORY NO. 13:

Please state which employees at Infiniweb have access, control, and/or authority to manage, send, or receive funds, including cryptocurrency, in wallets identified in Special Interrogatory 12, within the last five years.

SPECIAL INTERROGATORY NO. 14:

Please identify any third party that Infiniweb delegates access, control, or authority to manage, send, or receive funds, including cryptocurrency, in wallets identified in Special Interrogatory 12.

SPECIAL INTERROGATORY NO. 15:

Please state whether you have ever had currency seized from you by law enforcement, government, or military authority on any other occasion. If so, state the date and place of such seizure, the circumstances of the seizure, the amount of currency seized, the title of any judicial proceeding that resulted from the seizure and the court where such proceeding was filed, and the disposition of the seizure (i.e., whether you recovered the currency, defaulted or did not contest the seizure, or litigated but failed to recover the currency).

SPECIAL INTERROGATORY NO. 16:

State the names and addresses of all persons who assisted you in preparing answers to these interrogatories (except clerical personnel) and specify the interrogatory numbers each person assisted you with.

Sign the attached declarations and forward along with your responses. (Signature of counsel is not acceptable.)

This 5th day of December, 2025.

Respectfully submitted,

JEANINE FERRIS PIRRO
UNITED STATES ATTORNEY

/s/ Rick Blaylock, Jr.
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DECLARATION

I, _____, do hereby declare, certify and verify, under penalty of perjury as provided by federal law, that I have read the foregoing Answers to Interrogatories and that every answer is true and correct.

Executed on: _____ _____

CLAIMANT