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-1907-AHA
CLAIMANTS IDENTIFIED IN SCHEDULE A, Claimants.	

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

COMES NOW the Claimants identified in Schedule A ("Claimants") of Verified Claim (Dkt. 34), by and through their undersigned counsel, and hereby answer the Verified Complaint for Forfeiture filed by the Plaintiff, United States of America, as follows:

I. PRELIMINARY STATEMENT

Claimants have previously, timely filed Verified Claims in accordance with Supplemental Rule G(5)(a), asserting their interest in the Defendant asset *in rem* ("Defendant Property)" which is described in the Verified Complaint for Forfeiture as follows:

a. Approximately 225,364,961 USDT

Claimants answer the Verified Complaint for Forfeiture as follows:

II. RESPONSES TO ALLEGATIONS OF THE COMPLAINT

STATEMENT OF CASE

1. Based on Blockchain analysis conducted by Claimants, the Claimants admit that criminals stole funds from many victims, including from the Claimants, and laundered the stolen assets through a convoluted web of cryptocurrency accounts and addresses to evade detection. Claimants are without information or knowledge sufficient to form a belief as to the truth of the remaining allegations contained within this paragraph of the Complaint; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

2. Claimants decline to admit or deny this paragraph, including the information contained in the footnote, as it makes a legal assertion, and the law speaks for itself.

JURISDICTION AND VENUE

3. Claimants decline to admit or deny this paragraph as it makes a legal assertion, and the law speaks for itself.

4. Claimants decline to admit or deny this paragraph as it makes a legal assertion, and the law speaks for itself.

5. Claimants decline to admit or deny this paragraph as it makes a legal assertion, and the law speaks for itself.

NATURE OF THE ACTION AND STATUTORY BASIS FOR FORFEITURE

6. Claimants decline to admit or deny this paragraph as it makes a legal assertion, and the law speaks for itself.

7. Claimants decline to admit or deny this paragraph as it makes a legal assertion, and the law speaks for itself.

8. Claimants decline to admit or deny this paragraph as it makes a legal assertion, and the law speaks for itself.

9. Claimants decline to admit or deny this paragraph as it makes a legal assertion, and the law speaks for itself.

10. Claimants decline to admit or deny this paragraph as it makes a legal assertion, and the law speaks for itself.

11. Claimants decline to admit or deny this paragraph as it makes a legal assertion, and the law speaks for itself.

12. Claimants decline to admit or deny this paragraph as it makes a legal assertion, and the law speaks for itself.

13. Claimants decline to admit or deny this paragraph as it makes a legal assertion, and the law speaks for itself.

14. Claimants decline to admit or deny this paragraph as it makes a legal assertion, and the law speaks for itself.

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; however, to the extent a further response is required, Claimants 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

BACKGROUND ON VIRTUAL CURRENCY

17. Admit.

18. Admit.

19. Claimants admit that tracing can be reliably done on blockchain transactions to

determine which virtual currency addresses are sending and receiving particular virtual currency. Claimants 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; however, to the extent a further response is required, Claimants 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.

Background of Cryptocurrency Confidence Scams

31. Admit.

32. Admit.

33. Admit.

34. Admit.

35. Admit.

36. Admit.

37. Admit.

38. Admit.

39. Admit.

40. Admit.

41. Admit.

42. Admit.

43. Admit.

44. Admit.

STATEMENT OF FACTS

Summary

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; however, to the extent a further response is required, Claimants 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

47. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

48. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

49. Admit.

Origin of the Investigation

50. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

51. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

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OKX Accounts

53. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

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Victim Identification

67. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

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Cryptocurrency Confidence Scam Victim Reports

82. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

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97. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

Intermediary Addresses Used to Launder Funds

98. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

99. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

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OKX ACCOUNT USER ID 374833979540566465

102. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

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OKX ACCOUNT USER ID 389805680867066989

105. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

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OKX ACCOUNT USER ID 384075896514085732

108. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

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OKX ACCOUNT USER ID 373018233093155878

111. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

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OKX ACCOUNT USER ID 373019855340878937

114. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

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OKX ACCOUNT USER ID 389766564775375505

117. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

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OKX ACCOUNT USER ID 384292188047193948

120. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

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OKX ACCOUNT USER ID 373020133213522927

123. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

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OKX ACCOUNT USER ID 390147158499794973

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OKX ACCOUNT USER ID 383950945169627569

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OKX ACCOUNT USER ID 386106564001588904

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OKX ACCOUNT USER ID 384294632080738123

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OKX ACCOUNT USER ID 382867630484239151

138. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

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OKX ACCOUNT USER ID 482530396479873392

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OKX ACCOUNT USER ID 382898616072852403

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OKX ACCOUNT USER ID 373015529134418962

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OKX ACCOUNT USER ID 384001262326313296

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OKX ACCOUNT USER ID 436380439096268783

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OKX ACCOUNT USER ID 389726439408283934

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OKX ACCOUNT USER ID 382863414143418999

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OKX ACCOUNT USER ID 383132133998381393

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OKX ACCOUNT USER ID 373874806833197907

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Call Center Raid and USDT Freeze

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ANALYSIS OF INTERMEDIARY ADDRESSES CONSOLIDATING VICTIM FUNDS

173. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

174. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

175. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

176. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

177. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

OKX UID: 382863414143418999

178. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

179. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

OKX UID: 382867630484239151

180. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

181. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

OKX UID: 382898616072852403

182. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

183. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

OKX UID: 389726439408283934

184. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

185. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

OKX UID: 436380439096268783

186. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

187. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

189. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

190. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

191. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

USDT Token Group B, E, and F

192. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

USDT Token Group C

193. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

USDT Token Group G

194. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

195. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

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

196. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

197. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

198. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

199. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

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204. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

The SUBJECT VIRTUAL CURRENCY ADDRESSES

205. 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; however, to the

extent a further response is required, Claimants deny the allegations in this paragraph.

206. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

USDT Token Group A

207. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

208. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

209. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

USDT Token Group B

210. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

211. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

212. 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; however, to the

extent a further response is required, Claimants deny the allegations in this paragraph.

213. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

USDT Token Group C

214. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

215. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

216. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

USDT Token Group D

217. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

218. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

219. 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; however, to the

extent a further response is required, Claimants deny the allegations in this paragraph.

220. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

USDT Token Group E

221. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

222. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

223. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

224. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

USDT Token Group F

225. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

226. 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; however, to the

extent a further response is required, Claimants deny the allegations in this paragraph.

227. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

USDT Token Group G

228. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

229. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

230. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

Summary of the SUBJECT VIRTUAL CURRENCY ADDRESSES

231. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

232. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

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extent a further response is required, Claimants deny the allegations in this paragraph.

234. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

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237. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

238. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

Outreach From Potential Claimants

239. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

240. 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; however, to the extent a further response is required, Claimants deny the allegations in this paragraph.

COUNT ONE – FORFEITURE OF DEFENDANT PROPERTY
(18 U.S.C. § 981(a)(1)(C))

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

242. Claimants decline to admit or deny this paragraph as it makes a legal assertion, and the law speaks for itself.

243. Claimants decline to admit or deny this paragraph as it makes a legal assertion, and the law speaks for itself.

COUNT TWO – FORFEITURE OF DEFENDANT PROPERTY
18 U.S.C. § 981(a)(1)(A))

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

245. Claimants decline to admit or deny this paragraph as it makes a legal assertion, and the law speaks for itself.

246. Claimants decline to admit or deny this paragraph as it makes a legal assertion, and the law speaks for itself.

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: January 8, 2026

Respectfully Submitted,

By: /s/ Christopher Klotz
Christopher Klotz
DC Bar No. 439409
AYLSTOCK, WITKIN,
KREIS & OVERHOLTZ, PLLC
Email: cklotz@awkolaw.com
17 East Main Street, Suite 200
Pensacola, FL 32502
Phone: (850) 202-1010
Facsimile: (850) 916-7449

-and-

Marlene J. Goldenberg (Bar ID No. 1660420)
Nigh Goldenberg Raso & Vaughn, PLLC
14 Ridge Square NW, Third Floor
Washington, DC 20016
(202) 978-2228
mgoldenberg@nighgoldenberg.com

-and-

Daniel J. Thornburgh
FL Bar No. 0042661
AYLSTOCK, WITKIN,
KREIS & OVERHOLTZ, PLLC
Email: dthornburgh@awkolaw.com
17 East Main Street, Suite 200
Pensacola, FL 32502
Phone: (850) 202-1010
Facsimile: (850) 916-7449
(Pro Hac Vice Motion Forthcoming)

Attorneys for Claimants Identified in Schedule A

CERTIFICATE OF SERVICE

I, Nicholas Miranda, 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 January 8, 2026.

By: /s/ Christopher Klotz
Christopher Klotz
DC Bar No. 439409
AYLSTOCK, WITKIN,
KREIS & OVERHOLTZ, PLLC
Email: cklotz@awkolaw.com
17 East Main Street, Suite 200
Pensacola, FL 32502
Phone: (850) 202-1010
Facsimile: (850) 916-7449

Attorney for Claimants Identified in Schedule A