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. 25-cv-1907-AHA
NIVEDITA KAUL, Claimant.	

CLAIMANT NIVEDITA KAUL'S ANSWER TO
VERIFIED COMPLAINT FOR FORFEITURE IN REM

Claimant Nivedita Kaul of Verified Claim (Dkt. 53), by and through undersigned counsel, hereby answers the Verified Complaint for Forfeiture (Dkt. 1) filed by the Plaintiff, United States of America (Dkt .1), as follows:

I. PRELIMINARY STATEMENT

Claimant has previously, timely filed her Verified Claim in accordance with Supplemental Rule G(5)(a), asserting her interest in the Defendant asset *in rem* ("Defendant Property") which is descried in the Verified Complaint for Forfeiture as follows:

a. Approximately 225,364,961 USDT

Claimant answers the Verified Complaint for Forfeiture as follows:

II. RESPONSES TO ALLEGATIONS OF THE COMPLAINT

STATEMENT OF CASE

1. Based on Blockchain analysis conducted by Claimant, the Claimant admits that criminals stole funds from many victims, including the Claimant, and laundered the stolen assets

through a convoluted web of cryptocurrency accounts and addresses to evade detection. Claimant is 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, Claimant denies the allegations in this paragraph.

2. Claimant declines to admit or deny this paragraph, including the information contained in the footnote, as it makes a legal assertion.

JURISDICTION AND VENUE

3. Claimant declines to admit or deny this paragraph as it makes a legal assertion.

4. Claimant declines to admit or deny this paragraph as it makes a legal assertion.

5. Claimant declines to admit or deny this paragraph as it makes a legal assertion.

NATURE OF THE ACTION AND STATUTORY BASIS FOR FORFEITURE

6. Claimant declines to admit or deny this paragraph as it makes a legal assertion.

7. Claimant declines to admit or deny this paragraph as it makes a legal assertion.

8. Claimant declines to admit or deny this paragraph as it makes a legal assertion.

9. Claimant declines to admit or deny this paragraph as it makes a legal assertion.

10. Claimant declines to admit or deny this paragraph as it makes a legal assertion.

11. Claimant declines to admit or deny this paragraph as it makes a legal assertion.

12. Claimant declines to admit or deny this paragraph as it makes a legal assertion.

13. Claimant declines to admit or deny this paragraph as it makes a legal assertion.

14. Claimant declines to admit or deny this paragraph as it makes a legal assertion.

PROPERTY INFORMATION

15. Claimant is 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, Claimant denies the allegation in this paragraph.

16. Claimant is 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, Claimant denies the allegations in this paragraph.

BACKGROUND ON VIRTUAL CURRENCY

17. Admit.

18. Admit.

19. Claimant admits that tracing can be reliably done on blockchain transactions to determine which virtual currency addresses are sending and receiving particular virtual currency. Claimant is otherwise without information or knowledge sufficient to form a belief as to the truth of the allegations contained within this paragraph of the Complaint; however, to the extent a further response is required, Claimant denies the allegation 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 On Cryptocurrency Confidence Scams

31. Admit.

32. Admit.

33. Admit.

34. Claimant is 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, Claimant denies the allegations in this paragraph.

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. Claimant is 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, Claimant denies the allegations in this paragraph.

46. Claimant is 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, Claimant denies the allegations in this paragraph.

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49. Admit.

Origin of the Investigation

50. Claimant is 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, Claimant denies the allegations in this paragraph.

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OKX Accounts

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Victim Identification

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Cryptocurrency Confidence Scam Victim Reports

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Intermediary Addresses Used to Launder Funds

98. Claimant is 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, Claimant denies the allegations in this paragraph.

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OKX ACCOUNT USSER ID 374833979540566465

102. Claimant is 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, Claimant denies the allegations in this paragraph.

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OKX ACCOUNT USER ID 389805680867066989

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OKX ACCOUNT USER ID 384075896514085732

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OKX ACCOUNT USER ID 373018233093155878

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OKX ACCOUNT USER ID 373019855340878937

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OKX ACCOUNT USER ID 389766564775375505

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OKX ACCOUNT USER ID 384292188047193948

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OKX ACCOUNT USER ID 373020133213522927

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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

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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. Claimant is 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, Claimant denies the allegations in this paragraph.

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177. Claimant is 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, Claimant denies the allegations in this paragraph.

OKX UID: 382863414143418999

178. Claimant is 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, Claimant denies the allegations in this paragraph.

179. Claimant is 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, Claimant denies the allegations in this paragraph.

OKX UID: 382867630484239151

180. Claimant is 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, Claimant denies the allegations in this paragraph.

181. Claimant is 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, Claimant denies the allegations in this paragraph.

OKX UID: 382898616072852403

182. Claimant is 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, Claimant denies the allegations in this paragraph.

183. Claimant is 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, Claimant denies the allegations in this paragraph.

OKX UID: 389726439408283934

184. Claimant is 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, Claimant denies the allegations in this paragraph.

185. Claimant is 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, Claimant denies the allegations in this paragraph.

OKX UID: 436380439096268783

186. Claimant is 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, Claimant denies the allegations in this paragraph.

187. Claimant is 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, Claimant denies the allegations in this paragraph.

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

188. Claimant is 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, Claimant denies the allegations in this paragraph.

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USDT Token Group B, E, and F

192. Claimant is 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, Claimant denies the allegations in this paragraph.

USDT Token Group C

193. Claimant is 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, Claimant denies the allegations in this paragraph.

USDT Token Group G

194. Claimant is 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, Claimant denies the allegations in this paragraph.

195. Claimant is 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, Claimant denies the allegations in this paragraph.

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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USDT Token Group A

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USDT Token Group B

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USDT Token Group C

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USDT Token Group D

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USDT Token Group E

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USDT Token Group F

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USDT Token Group G

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Summary of the SUBJECT VIRTUAL CURRENCY ADDRESSES

231. Claimant is 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, Claimant denies the allegations in this paragraph.

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Outreach From Potential Claimants

239. Claimant is 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, Claimant denies the allegations in this paragraph.

240. Claimant is 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, Claimant denies the allegations in this paragraph.

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

241. Claimant re-alleges and incorporates her answers to the preceding paragraphs as though fully set forth herein.

242. Claimant declines to admit or deny this paragraph as it makes a legal assertion.

243. Claimant declines to admit or deny this paragraph as it makes a legal assertion.

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

244. Claimant re-alleges and incorporates her answers to the preceding paragraphs as though fully set forth herein.

245. Claimant declines to admit or deny this paragraph as it makes a legal assertion.

246. Claimant declines to admit or deny this paragraph as it makes a legal assertion.

III. AFFIRMATIVE DEFENSES

1. Claimant is an innocent owner pursuant to 18 U.S.C. § 983(d).

2. This Court must abstain from jurisdiction over Tether Wallet 0x82e1d4ddd636857ebcf6a0e74b9b0929c158d7fb ("Wallet 0x82e") and the assets that were held therein as of August 11, 2023. At the time of the Plaintiff's alleged seizure, Wallet 0x82e was already frozen pursuant to the criminal judicial seizure order (Decision 2023/5986) issued by a Turkish criminal court on August 11, 2023, in support of an ongoing prosecution against several dozen individuals in an organized crime network involving Wallet 0x82e and others. Principles of international comity and the prior-jurisdiction doctrine bar Plaintiff from exercising jurisdiction over assets already subject to Turkish judicial custody.

3. Plaintiff's Complaint is barred in whole or in part by the doctrine of forum non conveniens because Turkish criminal courts established prior judicial custody over the assets subject to this forfeiture on August 11, 2023 - more than 21 months before Plaintiff obtained its warrant in May 2025. Turkish courts have been actively adjudicating the criminal enterprise responsible for those assets for more than three years, resulting in multiple arrests and ongoing criminal proceedings concerning Wallet 0x82e and the network of wallets associated with the organized criminal enterprise that utilized them. The assets subject to Plaintiff's forfeiture constitute proceeds of the same criminal enterprise and remain evidence in those active Turkish proceedings.

4. Plaintiff's Complaint is barred in whole or in part by Claimant's right to due process under the Fifth Amendment and notice under Rule G(4)(b) because Plaintiff failed to provide requisite notice to Claimant, who reasonably appeared to be a potential claimant on the facts known to the government before the time for filing under F.R.C.P. Supp. R. G(5)(a)(ii)(B) expired.

5. Claimant reserves 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.

RULE 44.1 NOTICE

Pursuant to Federal Rule of Civil Procedure 44.1, Claimant hereby gives notice that she intends to raise issues concerning the law of Turkey, specifically Criminal Procedure Code Art. 128 and 131, and Turkish Criminal Code Art. 55, regarding her rights in the assets that had been held in Wallet 0x82e at the time of the Turkish court's seizure order.

Dated: April 7, 2026

Respectfully submitted,

SEQUOR LAW, P.A.
s/ Tara J. Plochocki
Tara J. Plochocki (D.C. Bar No. 989404)
Sequor Law, P.A.
1200 G Street, N.W.
Suite 340
Washington, D.C. 20005
tplochocki@sequorlaw.com
Tel. (202) 900-8740

Counsel for Claimant Nivedita Kaul

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of April, 2026, I caused a copy of the foregoing Answer to Verified Complaint for Forfeiture In Rem to be filed via the Court's CM/ECF system, which will send notice to all counsel of record.

s/ Tara J. Plochocki
Tara J. Plochocki