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-01907-AHA

DECLARATION OF NIVEDITA KAUL AS TO EXHIBITS A TO E

I, Nivedita Kaul, declare:

1. Exhibit A is a true and accurate copy of the transcript published on the web page for the Financial Times video report titled "Premier League betting sponsors: closed doors and companies within companies," dated September 8, 2023, at https://www.ft.com/video/4bf67319-ce1e-4d13-a49d-120e12cc7d3d, together with the page's title, date and URL. I accessed and copied it on October 5, 2026. I have made no change to its text other than omitting the video player's caption notice.

2. Exhibit B consists of a true and accurate screenshot of a LinkedIn post by Erin West, at https://lnkd.in/p/gEEtgxfH, and of comments on it.

(a) I captured them myself, while logged in to my own LinkedIn account.

(b) I took the capture on September 23, 2023 at 6 PM (Eastern Time).

(c) The comments were displayed in LinkedIn's "Most relevant" view.

(d) I cropped the screenshot to show only Ms. West's post, Mr. Welte's comment and the reply to it from the Operation Shamrock account. The crop removes my own profile panel (my own small profile picture beside the reaction counts remains), an advertisement, the

comment box, a row of other users' profile pictures, the comment-sort label, a reply by another user that appeared between Mr. Welte's comment and the Operation Shamrock reply (its place is marked on the page), and the other comments on the post. Dividing lines and the words "reply by another user omitted" were added. No other alteration was made.

3. Exhibit C is a true and accurate copy of an email sent by Roger Welte on September 13, 2026 to a usdoj.gov address, on which I was blind-copied. Mr. Welte's declaration identifies the recipient at the United States Attorney's Office, District of Columbia. I printed it from my DDG email account on October 2, 2026.

4. Exhibit D is a true and accurate copy of the article "They Lost Their Money to Scammers—and Now Battle the U.S. Government to Recover It," by Dylan Tokar, published by The Wall Street Journal on September 9, 2026 at https://www.wsj.com/finance/currencies/crypto-investment-scam-victims-big-tuna-a489ece6. I captured it as a PDF with FireShot Pro.

5. I am the founder of Digital Defenders Group ("DDG"). Roger Welte serves DDG as an unpaid volunteer, Senior Policy Advocate and Director of Government Engagement. He has consented to the filing of his email and LinkedIn material (Exhibits C and B).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on October 5, 2026, at Palm Springs, CA.

Dated: October 5, 2026

Respectfully submitted,

/s/ Nivedita Kaul
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