

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

v.

HO WAN KWOK, *et al.*

Defendants.

23-cr-00118 (AT)

**DECLARATION OF BRADFORD  
L. GEYER IN SUPPORT OF  
MOTION FOR ADMISSION PRO  
HAC VICE**

ECF CASE

I, BRADFORD L. GEYER, hereby declare as follows:

1. I am a partner with the firm of FormerFedsGroup.Com LLC, a law firm in the State of New Jersey;
2. I submit this declaration in support of my Motion for Admission Pro Hac Vice in the above-captioned matter;
3. As shown in the Certificate of Good Standing attached hereto, I am a member in good standing of the bar of the state of New Jersey.
4. I have never been convicted of a felony, never been censured, suspended, disbarred or denied admission or readmission by any court, and there are no pending disciplinary proceedings presently against me in any court.
5. I respectfully request to be permitted to appear as counsel *pro hac vice* in this case for to represent the interests of 3,345 customers of the Himalaya Exchange whose funds have been seized.

I declare under penalty of perjury that the foregoing statements are true and correct based on my personal knowledge.

Executed this 5<sup>th</sup> day of December, 2023.

*/s/ Brad Geyer*

BRADFORD L. GEYER