

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

HO WAN KWOK,

Defendant.

FILED PARTIALLY UNDER SEAL

Case No. 1:23-CR-118-1 (AT)

**DECLARATION OF
SIDHARDHA KAMARAJU, ESQ.
ACCOMPANYING DEFENDANT'S
MOTIONS IN LIMINE**

I, SIDHARDHA KAMARAJU, ESQ., hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner at the law firm Pryor Cashman LLP, counsel for Defendant Ho Wan Kwok in the above-captioned matter. I submit this declaration upon my personal knowledge in support of Defendant Ho Wan Kwok's Motions *in Limine*.

2. A true and correct copy of excerpts of a March 22, 2022 hearing in the Bankruptcy Cases is attached hereto as **Exhibit A**.

3. A true and correct copy of a Federal Bureau of Investigation report dated November 19, 2020 is attached hereto as **Exhibit B**.

4. A true and correct copy of a December 11, 2023 letter from the government to counsel for Mr. Kwok disclosing information pursuant to its obligations under *Brady v. Maryland*, 373 U.S. 83 (1963), is attached hereto as **Exhibit C**.

5. A true and correct copy of the Expert Disclosure of Professor Amin Shams dated April 1, 2024 is attached hereto as **Exhibit D**.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 9, 2024.



Sidhardha Kamaraju
Counsel for Defendant
Ho Wan Kwok