

**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 ACCOMPANYING  
DEFENDANT'S MOTION TO  
COMPEL DISCOVERY**

I, MATTHEW S. BARKAN, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner at the law firm Pryor Cashman LLP and counsel for Defendant Ho Wan Kwok in the above-captioned matter. I submit this declaration upon my personal knowledge in support of Defendant's Motion to Compel Discovery.

2. A true and correct copy of excerpts from the transcript of an August 29, 2023 hearing in the adversary proceeding captioned *Despins v. Taurus Fund LLC et al.*, Adv. Proc. No. 24-05017(JAM) (Bank. R. Conn.) is attached hereto as **Exhibit 1**.

3. A true and correct copy of excerpts of the Second Interim Fee Application filed by Luc A. Despins, Esq. as trustee of the chapter 11 bankruptcy cases captioned *In re Ho Wan Kwok, et al.*, Case No. 22-50073(JAM) (Bankr. D. Conn.) (Jointly Administered), is attached hereto as **Exhibit 2**.

4. A true and correct copy of an Affidavit in Support of Application for Search Warrant dated September 10, 2021 produced by the government at USAO\_00000001 is attached hereto as **Exhibit 3**.

5. A true and correct copy of an Affidavit in Support of Application for Search Warrant dated August 23, 2022 produced by the government at USAO\_\_00000379 is attached hereto as **Exhibit 4**.

6. A true and correct copy of an Affidavit in Support of Application for Search Warrant dated January 17, 2023 produced by the government at USAO\_00000784 is attached hereto as **Exhibit 5**.

7. A true and correct copy of an Affidavit in Support of Application for Search Warrant dated September 10, 2021 produced by the government at USAO\_00106972 is attached hereto as **Exhibit 6**.

8. A true and correct copy of an Affidavit in Support of Application for Search Warrant dated January 11, 2023 produced by the government at USAO\_0000746 is attached hereto as **Exhibit 7**.

9. A true and correct copy of an Affidavit in Support of Application for Search Warrant dated March 14, 2023 produced by the government at USAO\_00001633 is attached hereto as **Exhibit 8**.

10. A true and correct copy of an Affidavit in Support of Application for Search Warrant dated March 14, 2023 produced by the government at USAO\_00110481 is attached hereto as **Exhibit 9**.

11. A true and correct copy of an Affidavit in Support of Application for Search Warrant dated March 10, 2023 produced by the government at USAO\_00001007 is attached hereto as **Exhibit 10**.

12. A true and correct copy of an Affidavit in Support of Application for Search Warrant dated March 6, 2023 produced by the government at USAO\_00110181 is attached hereto as **Exhibit 11**.

13. A true and correct copy of an Affidavit in Support of Application for Search Warrant dated October 16, 2022 produced by the government at USAO\_00108612 is attached hereto as **Exhibit 12**.

14. A true and correct copy of an Affidavit in Support of Application for Search Warrant dated September 18, 2022 produced by the government at USAO\_00107227 is attached hereto as **Exhibit 13**.

15. A true and correct copy of an Affidavit in Support of Application for Search Warrant dated October 16, 2022 produced by the government at USAO\_00108677 is attached hereto as **Exhibit 14**.

16. A true and correct copy of an email chain between counsel for Mr. Kwok and counsel for the government ending on August 28, 2023 is attached hereto as **Exhibit 15**.

17. A true and correct copy of a letter from the government to former counsel for Mr. Kwok dated June 26, 2023 is attached hereto as **Exhibit 16**.

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

Executed on September 20, 2023.



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Matthew S. Barkan  
*Counsel for Defendant  
Ho Wan Kwok*