

**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  
MOTION TO DISMISS THE  
SUPERSEDING INDICTMENT**

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's Motion to Dismiss the Superseding Indictment.

2. A true and correct copy of the GTV Confidential Information Memorandum dated April 20, 2020, which was produced in this proceeding by the government, is attached hereto as **Exhibit A**.

3. A true and correct copy of a June 26, 2023 letter from the government to prior counsel for Mr. Kwok disclosing information pursuant to its obligations under *Brady v. Maryland*, 373 U.S. 83 (1963), is attached hereto as **Exhibit B**.

4. A true and correct copy of a G|CLUBS Membership Agreement, which was produced in this proceeding by the government, is attached hereto as **Exhibit C**.

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

Executed on February 7, 2024.



---

Sidhardha Kamaraju  
*Counsel for Defendant  
Ho Wan Kwok*