

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

HII MISSION TEHNOLOGIES CORP.,

Interpleader Plaintiff,

v.

Case Number: 3:25cv483

ATLANTIC WAVE HOLDINGS, LLC, et al.,

Interpleader Defendants/Claimants.

**SECOND DECLARATION OF WILLIAM WELTER ON BEHALF OF ATLANTIC  
WAVE HOLDINGS, LLC and SECURE COMMUNITY, LLC**

1. My name is William Welter and I am over the age of 21 years and competent.
2. I am the Managing Director of Atlantic Wave Holdings, LLC (“AWH”) and Secure Community, LLC (“SC”).
3. I am familiar with Cyberlux Corporation (“CYBL”) having been in litigation with CYBL since 2022.
4. I lead the enforcement of AWH’s and SC’s rights against Cyberlux in Texas, California and Virginia. In Texas and California, Atlantic Wave defended three attempted unsuccessful removal actions by Cyberlux which were all remanded back to State Court, one Writ of Mandamus, one Appeal and several Motions filed in the Court of Appeals, which were all defeated, as well as numerous unsuccessful Motions filed by CYBL in the trial court.
5. In total, AW sought and was granted more than four sanctions against Cyberlux by the various courts.
6. I am personally familiar with all of the factual representations asserted in the Memorandum in Support of the Motion for Summary Judgment which are accurate insofar as I either participated in their production or reviewed them as part of my litigation efforts. This would include, but not be limited to, the acquisition of Catalyst Machineworks, LLC by CYBL, the OTC quarterly filings, the Agreements, the UCC-1 filings, the Court Orders, the locations of

manufacturing, assemblage, headquarters, origination and all other documents referred to in the Memorandum.

7. The government issued a stop work order on the HII P000043846 Subcontract with CYBL on December 22, 2023.

8. HII terminated Subcontract P000043836 with CYBL on May 17, 2024.

9. I have reviewed all corporate Over the Counter Markets (OTC) filings for CYBL between 2022 and the current date.

10. OTC filings are required quarterly and are made under oath by an authorized corporate officer.

11. Fairwinds, ARG and the WeShield parties are not designated as debt holders of CYBL for any quarter(s) prior to the present Interpleader action.

12. The same corporate filings do not reflect commissions owed or contracts entered with any of the Fairwinds entity, or the ARG entity. The WeShield parties were mentioned only after the Inter-Pleader action commenced.

I declare the foregoing is true and accurate to the best of my knowledge under penalty of perjury.

Executed on April 22, 2026

BY: William Welter  
William Welter