

<p>JAMES CURTIN,</p> <p style="padding-left: 40px;">Plaintiff,</p> <p>v.</p> <p>CYBERLUX CORPORATION et al.,</p> <p style="padding-left: 40px;">Defendants.</p>	<p>IN THE UNITED STATES DISTRICT COURT</p> <p>FOR THE MIDDLE DISTRICT OF NORTH CAROLINA</p> <p>GREENSBORO DIVISION</p> <p>Civil Action No. <u>1:26cv472</u></p>
---	---



**DECLARATION OF JAMES CURTIN IN SUPPORT OF COMPLAINT**

I, James Curtin, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am the Plaintiff in this action. I am an individual domiciled in the State of New York. I am the founder and principal of Carotank Road Holdings, Inc., a defence industry advisory, and I publish investigative reporting under the pen name Jackson Holt. I have personal knowledge of the facts set forth in this Declaration and could testify to them if called as a witness.
  
2. I make this Declaration in support of the Complaint filed simultaneously herewith to authenticate the exhibits attached to the Complaint, to confirm the evidentiary basis for the factual allegations therein, and to state my status as a confirmed federal witness in connection with the investigation described below.
  
3. The Complaint and all factual allegations therein are based on my personal knowledge, my review and analysis of publicly available court filings, government records, corporate disclosures, and documentary evidence, and my direct participation in the events described. No attorney has prepared or assisted in the preparation of the Complaint or this Declaration.

## **FEDERAL INVESTIGATIVE STATUS**

4. On March 12, 2026, I was interviewed for approximately five hours at the headquarters of the General Services Administration, F Street NW, Washington, D.C., by Special Investigators from the OIG of the General Services Administration and the OIG of the Department of Defense. The interview covered, among other matters, the wire transfer of \$213,000 from Cyberlux Corporation's account to Fletcher Jones Motorcars, Newport Beach, California on September 11, 2023, and the wire transfer of \$994,460 to G2G Global Ltd. on October 16, 2023, both drawn from the \$38,700,600 Foreign Military Financing advance payment Cyberlux received on September 8, 2023. I received follow-up contacts from OIG investigators on March 16 and March 23, 2026. I am a confirmed federal witness as of March 12, 2026. The OIG Notice to all counsel of record dated April 20, 2026 is attached to the Complaint as Exhibit A.

## **AUTHENTICATION OF EXHIBITS**

5. Exhibit A is a true and correct copy of the notice I transmitted to all counsel of record on April 20, 2026, advising of my status as a cooperating witness in the federal OIG investigation.

6. Exhibit B is a true and correct copy of the notification I transmitted to Linde plc on March 11, 2026, attaching the City of Greensboro FOIA-produced messages submitted to Defendant Watts through the official City of Greensboro government website contact form on June 26, 2025, and a screenshot of the associated X/Twitter account @BruceMcDou67575. The FOIA-produced messages were provided to me by the City of Greensboro in response to a public records request.

Within approximately forty-eight hours of my transmitting this notification to Linde plc, the @BruceMcDou67575 account was permanently closed.

7. Exhibit C is a true and correct copy of correspondence I transmitted to Gin and Ignorance Limited, trading as The Racketeer, 105 King's Cross Road, London WC1X 9LR, dated April 23, 2026, May 1, 2026, and May 5, 2026, regarding the unauthorized use of The Racketeer's bespoke mark as the profile image of the @RacketeerX account during the May 27, 2025 doxxing campaign. As of the date of this Declaration, Gin and Ignorance Limited has not responded to any of these communications.

8. Exhibit D is a true and correct copy of Google Analytics 4 session data from jacksonholt.com and cyberluxfiles.com through May 2026, exported from my Google Analytics account. All timestamps in this dataset have been normalized to Eastern Daylight Time in accordance with the methodology I previously described in my Supplemental Declaration filed in the prior related proceeding, Curtin v. Watts et al., Case No. 1:25-cv-00782-TDS-JGM (M.D.N.C.), ECF No. 65. I collected and maintained this data in the ordinary course of administering those publications.

9. Exhibit E is a true and correct copy of the formal cease and desist notice I transmitted on May 13, 2026, to Carson John Tucker as Director of G2G Global Ltd., 86-90 Paul Street, London EC2A 4NE, demanding cessation of all surveillance and intelligence collection directed at me, my family, my professional entities, and my clients; removal of all doxxing material published or distributed in connection with the @RacketeerX campaign; full disclosure of all information collected about me; and data preservation. As of the date of this Declaration, the deadline has expired without compliance or response.

10. Exhibit F consists of true and correct copies or screenshots of the following materials, each of which I personally captured or received: (a) the May 10, 2025 WhatsApp message received at 2:34 PM EDT from Bilal Maadarani on my personal WhatsApp channel, containing the surveillance riddle identifying me by pen name (JH — Jackson Holt) and legal name (JC — James Curtin); (b) screenshots of the @RacketeerX campaign of May 27, 2025, including the opening post, the personal dossier materials, the “Selector Attribution” table, and posts deploying personal humiliation content directed at me by name; (c) the May 27, 2025 WhatsApp message received at 4:32 PM EDT from Bilal Maadarani on the same personal channel during the active @RacketeerX campaign; and (d) the threatening communications posted by the account identified as ORCA (@NBBLegend) on June 14, 2025. Each screenshot or message capture in Exhibit F is a true and accurate depiction of the content as I received or observed it.

11. Exhibit G is a true and correct timeline of investigative articles I published under the pen name Jackson Holt at jacksonholt.com and cyberluxfiles.com from November 2024 through May 2026. I prepared this timeline personally based on my publication records. Each entry reflects the article title, publication date, platform, and a summary of its content. Articles marked with italicized notation require verification of exact publication date against my publication archives; all other entries reflect confirmed dates from my Supplemental Declaration, Google Analytics 4 session data, and publication records.

#### **PRIOR DECLARATION AND RESERVATION**

12. My Supplemental Declaration, filed in Curtin v. Watts et al., Case No. 1:25-cv-00782-TDS-JGM (M.D.N.C.), ECF No. 65, contains detailed factual statements regarding the events described in this Complaint, including the surveillance and doxxing campaign, the GA4 geographic traffic analysis, and my prior professional engagement with Defendants Schmidt and Maadarani. I incorporate that Declaration by reference and confirm that its factual statements remain accurate to the best of my knowledge as of the date of this Declaration.

13. I reserve the right to supplement this Declaration as discovery proceeds and as additional information becomes available through litigation, public records requests, or other lawful means.

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

Executed this 21 day of May, 2026, in Pittsford, New York.



---

**James Curtin**  
Plaintiff, Pro Se  
12 Tobey Court  
Pittsford, New York 14534  
jim@carotankroad.com