

<p>JAMES CURTIN,</p> <p>Plaintiff,</p> <p>v.</p> <p>CYBERLUX CORPORATION et al.,</p> <p>Defendants.</p>	<p>IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF NORTH CAROLINA GREENSBORO DIVISION</p> <p>Civil Action No. 1:26-cv-00472</p>
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**DECLARATION OF JAMES CURTIN IN SUPPORT OF FIRST AMENDED
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, residing at 12 Tobey Court, Pittsford, New York 14534. I am the founder and principal of Carotank Road Holdings, Inc., a defence industry advisory firm, and I publish investigative reporting under the pen name Jackson Holt. Carotank Road Holdings, Inc. is not a plaintiff in this action. 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 First Amended Complaint filed simultaneously herewith to authenticate the exhibits attached to the First Amended Complaint, to confirm the evidentiary basis for the factual allegations therein, to state my status as a confirmed federal witness in connection with the investigation described below, and to provide sworn support for the damages figures set forth in the First

Amended Complaint. No attorney has prepared or assisted in the preparation of the First Amended Complaint or this Declaration.

3. The First Amended 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.

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 First Amended Complaint as Exhibit A.

WB GROUP PROFESSIONAL RELATIONSHIP AND DUE DILIGENCE

5. I serve as President of WB Group America, the North American operating entity of WB Group of Poland, a Warsaw-based defence and technology company. In that

capacity, I conducted due diligence on behalf of WB Group on a proposed merger or acquisition transaction involving Cyberlux Corporation. That due diligence occurred prior to the @RacketeerX campaign of May 27, 2025. My findings — which identified the financial irregularities, undisclosed arrangements, and structural problems documented in the First Amended Complaint — resulted in the termination of the proposed transaction. WB Group's decision not to proceed was informed by and consistent with my findings. The @RacketeerX campaign and associated coordinated conduct described in the First Amended Complaint followed the publication of reporting consistent with those findings. I declare that the @RacketeerX campaign's narrative that I had personally sought to acquire Datron World Communications and had conducted an espionage operation out of personal grievance is false. WB Group had separately evaluated Datron World Communications as a potential acquisition target and concluded it was essentially worthless as a business. That evaluation predated any connection to Cyberlux.

PROFESSIONAL HARM AND INTELLECTUAL PROPERTY VALUATION

6. As a direct result of the coordinated campaign described in the First Amended Complaint, the following professional relationships were terminated or materially diminished: my engagement with WB Group of Poland, which distanced itself from me following Defendant Maadarani's direct private contact with WB Group leadership on or around June 9, 2025; my engagement with OTTO; my engagement with Aurelian Industries; and my preliminary discussions with SOCOM PEO TIS regarding a wide-area

surveillance requirement. Each of these relationships was active and commercially viable immediately prior to the campaign. Each was materially disrupted within days of the campaign's predicate wire communications.

7. I personally own and have developed the following intellectual property platforms: COEUS, PROTEUS, Cerameta, Anchor 5.0, and Equilibrium Drift 4.0. The coordinated campaign and false espionage accusations did not destroy the underlying technical concepts. They destroyed my personal ability to commercialize those assets in the defence and national-security advisory market by publicly associating me with espionage, foreign-agent activity, and securities manipulation — accusations that are operationally disqualifying in a market governed by counterintelligence trust and security clearance considerations. The consolidated mid-case portfolio valuation for these assets is \$73,000,000. This figure reflects the commercially reasonable valuation of the identified acquisition windows and development stage assessments as of the date of this Declaration, based on my knowledge of the market and the specific opportunities that were lost or foreclosed as a result of the campaign.

AUTHENTICATION OF EXHIBITS

8. 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.

9. 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.

10. 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.

11. 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.

12. 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.

13. 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 identifying eight members of my family including two deceased family members, the photograph of my residential building, the “Selector Attribution” table, posts deploying drag imagery and the false female-persona espionage narrative, and posts tagging @SECGov and @TheJusticeDept; (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; (d) the June 5, 2025 communications from @USAfirstandonly, in which that account stated that it possessed my home address, phone number, and email address and stated “I am thinking of paying you a visit”; and (e) 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.

14. 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.

15. Exhibit H is a true and correct copy of the email I transmitted to all counsel of record on May 21, 2026, transmitting the First Amended Complaint and all accompanying exhibits via FedEx overnight delivery, tracking number 872089735190.

16. Exhibit I consists of true and correct copies of: (a) the Cyberlux Corporation @CyberluxC X/Twitter post of May 26, 2026, announcing the dismissal of Case No. 1:25-cv-00782-TDS-JGM without disclosing the existence of this action, Case No. 1:26-cv-00472; and (b) subsequent posts by identified prior campaign participants responding to or amplifying the @CyberluxC post. Each screenshot is a true and accurate depiction of the content as I observed it.

17. Exhibit J is my Independent Citation Verification Record, prepared under 28 U.S.C. § 1746, documenting the results of my independent verification of the legal authorities

cited in the First Amended Complaint against primary sources to the best of my knowledge and belief.

18. Exhibit K consists of true and correct copies of WhatsApp communications between Defendant Bilal Maadarani and Piotr Krystek of WB Group, on or around June 9, 2025, and the related communications Piotr Krystek transmitted to me contemporaneously.

These materials were provided to me by Piotr Krystek and are accurate depictions of the content as I received them. A message was deleted from the Maadarani-Krystek exchange at 22:47 local time. The deletion is documented in the exhibit materials.

PRIOR DECLARATION AND RESERVATION

19. 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 First Amended 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.

20. 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 to the best of my knowledge and belief.

Executed this 17 day of May, 2026, in Pittsford, New York.



James Curtin

Plaintiff, Pro Se

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