

DECLARATION OF [REDACTED]

Pursuant to 28 U.S.C. § 1746, I declare as follows:

1. I am a Dominican Republic citizen over eighteen years of age.
2. I currently reside in Boston, Massachusetts and make this statement while present in Boston.
3. If called upon, I could testify competently about the facts set forth in this declaration. This declaration does not contain every detail I remember about the events and activities described. If asked additional questions, I could provide more information.
4. At the time of this declaration, I cannot afford to retain a lawyer. I am exploring whether to seek appointed counsel, but do not have a lawyer yet. I make this statement freely and voluntarily without a lawyer present.
5. I first came to the United States in 2005 and went back and forth to the Dominican Republic. Since approximately 2012, I have lived in the United States. I have had multiple jobs in the United States, including painting houses and working as an Uber driver.
6. In approximately 2023, I met Emmanuel Clase in Boston through a mutual acquaintance. I was aware at the time that Emmanuel was a pitcher for the Cleveland Guardians baseball team. In addition to both being from the Dominican Republic, we share several interests and became friends.
7. Around that time, I was dating a person in Cleveland and often saw Emmanuel while I was in town. On occasion, I stayed at Emmanuel's house when I was in Cleveland.
8. Emmanuel has several young children and is on the road frequently for his job. I provided basic assistance to his family, including running errands and other similar tasks. I also acquired authentic Dominican food in New York and arranged for it to be delivered to Emmanuel and his family in Cleveland. The Dominican population in the Cleveland area is very small and it

is otherwise very difficult to obtain authentic Dominican food in Ohio. When I got food for Emmanuel or ran other errands for him, he paid me. One time, I asked Emmanuel for money and he gave me approximately \$2,000 or \$2,500.

9. I am a big sports fan and enjoy placing recreational bets on sporting events through legal gambling apps, including Draft Kings and Fan Duel. I primarily bet on football, horse racing, basketball, and baseball.
10. DraftKings and FanDuel both offer live prop bets on specific plays within games. These bets are only open for a short time, generally seconds or minutes before the event. For example, DraftKings offers prop bets in baseball on whether a pitch will be over or under a specific velocity or whether a pitch will be a ball or a strike. I often placed wagers on these prop bets during Major League Baseball games, including games when Emmanuel pitched.
11. I liked the bets on pitches because I was a baseball player myself and had a better knowledge on what pitches may be thrown in a given situation. At times, I used ChatGPT to provide an analysis of a specific batter. I then used that information to help my place bets.
12. Sometimes these strategies were successful. Sometimes they were not successful. For example, I once lost thousands of dollars betting on Paul Skenes because I couldn't predict what pitches he would throw.
13. Emmanuel never provided me with any form of information on the pitches he intended to throw in a game to allow me to win a bet. Emmanuel also never gave me any form of information regarding pitches that any of his teammates intended to throw. Emmanuel never gave me any information regarding any component of a Major League Baseball game that related to gambling or would assist me in winning a bet.

14. I did not discuss baseball gambling with Emmanuel in any way. Emmanuel never asked me to place a bet on baseball for his benefit and we otherwise never entered into any form of agreement for him to benefit from gambling on baseball in any capacity, whether the bets were placed by me or any other person.

15. I was more confident betting on Emmanuel than any other player because I knew him well and was able to recognize some of his tendencies and pick up on how he was performing in a given game. Emmanuel essentially only throws two pitches, a cut fastball and a slider. This made betting on him more simple and I thought I had a better chance of predicting what would happen. For example, my recollection is that DraftKings often set the over under on the speed of Emmanuel's pitches at 98.5 miles per hour. While watching a game live or in person, if I believed that Emmanuel would be tight to start a relief outing, I sought to place a bet that his velocity would be under 98.5. I used this same betting strategy on other pitchers as well.

16. At times, I coordinated my bets with a friend named [REDACTED]. We did this so we could pool our money to try to make more on bets together than we could on our own.

17. On one occasion, I also talked to my brother, [REDACTED], about a bet for a pitch thrown by Luis Ortiz.

18. I did not receive any information from Emmanuel or any other Major League Baseball player about any bets I discussed with [REDACTED], whether the bets were on Emmanuel, Ortiz, or any other Major League player. To my knowledge, Emmanuel does not know either [REDACTED].

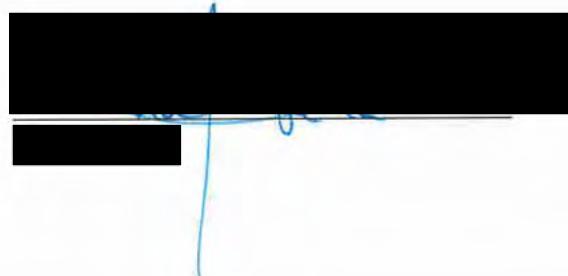
19. At times, Emmanuel left me tickets to attend Guardians games in person. I sometimes placed bets during those games. When I placed those bets, I did not receive any information or signals from Emmanuel to know what pitch he intended to throw.

20. While I never discussed baseball gambling with Emmanuel in any way, I did discuss betting on rooster fighting with him. In the Dominican Republic, gambling on roosters is completely legal and Emmanuel has a rooster fighting operation.

21. At times, I watched these legal rooster fights on Facebook and placed bets on which rooster would win. At times, I paid money to people associated with Emmanuel in the Dominican Republic who run his rooster operation, either to cover bets or expenses related to the roosters. This money was only related to rooster fighting and had nothing to do with gambling on baseball.

22. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 6th day of August 2025.

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